



**Wyoming Wilderness Association**

P.O. Box 6588 (Mailing)  
44 S. Main (Physical)  
Sheridan, WY 82801  
(307) 672-2751

---

October 30, 2023

Todd Stiles, District Ranger  
Bridger-Teton National Forest – Jackson Ranger District  
P.O. Box 1689  
Jackson, WY 83001

Submitted online at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64890>  
cc: [timothy.farris@usda.gov](mailto:timothy.farris@usda.gov), [todd.stiles@usda.gov](mailto:todd.stiles@usda.gov)

Re: E-bike designation on select Jackson trails

Dear Mr. Stiles:

Thank you for the opportunity to comment on the Jackson Ranger District's scoping document for *E-Bike Use Designation on Select Jackson Area Trails*. Please accept this letter on behalf of the Wyoming Wilderness Association (WWA), a statewide nonprofit organization with a mission to protect Wyoming's Wilderness and public wildlands through advocacy, education, and stewardship. Our organization represents the interests of nearly 3,000 conservation, recreation, and outdoor enthusiasts from across Wyoming and the United States, who value the wild places and experiences found in places like the Bridger-Teton National Forest (BTNF).

First, we would like to thank the project managers on the BTNF for the public outreach on this project, the intention to analyze additional e-bike designations through an Environmental Analysis (EA), and this opportunity to submit scoping comments to inform subsequent drafts. We agree with the Purpose and Need of the project as described in the scoping document, and largely support the project approach of starting small with an emphasis on monitoring and implementation to inform future land management decisions. We are especially appreciative and supportive of the proposed permit system with related educational opportunities to promote responsible users and aid in enforcement realities.

Our primary issue with the current proposal concerns potential impacts to the Palisades Wilderness Study Area (WSA) and the United States Forest Service (USFS) obligation to protect its wilderness character under the Wyoming Wilderness Act of 1984.<sup>1</sup> After recently reviewing the information provided in the scoping documents, it appears that several of the proposed e-bike route designations would directly connect to trails entering or continuing into the Palisades WSA, and that a high concentration of the newly proposed e-bike designations border the length of the WSA. Given the likelihood of increased motorized incursions in the Palisades WSA that could directly result from this proposal, we were surprised and disappointed that the scoping document fails to mention any potential impacts to this specially designated area. The scoping document states that no 'Wilderness Study Areas are being proposed' but fails to highlight those proposed e-bike trail designations directly connected to system trails

---

<sup>1</sup> Public Law 98-550, Sec. 301. (c)(4)

in the Palisades Wilderness Study Area, mention the proximity of most of the proposed designations to the boundary of the entire WSA, or include an enforcement or education plan to prohibit motorized trespass into the Palisades WSA. Future public planning documents should clearly disclose proposed trail designations that have the most direct, obvious impact or enforcement concerns for the Palisades WSA; for example, Table 1 should include a column noting which trails directly connect or lead into trails within the Palisades WSA. These trails present the greatest direct potential impact to the Palisades WSA by inviting or increasing illegal, unenforced motorized vehicle incursions - a management action that could be in direct violation of congressional directives. It is concerning that the scoping document fails to mention any plan for enforcing these proposals and prohibiting e-bike use on trails that connect or continue onto system trails within the Palisades WSA. We look forward to that important information and analysis in the EA.

In addition to thoroughly analyzing and disclosing the direct impacts of increased illegal motorized vehicle incursions into the Palisades WSA, we would encourage the BTNF to consider potential indirect impacts on the wilderness character of the Palisades WSA and include a broader discussion on those impacts within the EA. These include but are not limited to: associated impacts of increased motorized vehicle access along and into the WSA; decreased opportunities for solitude; possible increased mountain bike use within the WSA resulting from increased e-bike use on the adjacent proposed frontcountry trails; and even the long-term implications of possibly entrenching or increasing public demand for an additional non-wilderness-compatible use in the Palisades area, and how that might further complicate the BTNF's ability to protect the Palisades WSA as Congress intended.

The Palisades WSA was established by Congress with specific management directives in the Wyoming Wilderness Act of 1984. Since that time, the BTNF has a history of management action and inaction that appear to have prioritized recreational demand over these unique congressional directives - mandates that were meant to protect the 1984 character of the area to preserve its potential inclusion in the National Wilderness Preservation System. From exceptions adopted in the 1990 Forest Plan, sanctioning of the illegal user-created Lithium mountain bike trail in the early 2000s, and failing to address drastically increasing motorized and mechanical vehicular use in more than one instance, the BTNF has (likely unintentionally) fostered incompatible wilderness uses that have increasingly challenged the agency's ability to meet congressional mandates and intent. We hope that the BTNF takes seriously its responsibility to protect one of Wyoming's most eligible wildlands for future Wilderness designation, and that that responsibility is reflected in the analysis and consideration of the potential long-term impacts of system trail designations accessing the Palisades WSA.

More broadly, WWA shares others' conservation-minded concerns regarding impacts to wildlife and a potential "slippery slope" for additional e-bike designations on the BTNF. The Jackson District of the BTNF has demonstrated a commitment to understanding and acknowledging wildlife-recreation impacts in recent years, and we hope that this project is used to better understand those impacts and continue to inform future decisions. A brief review of current scientific literature on the impacts of bicycles or increased non-motorized recreation on local wildlife would be welcomed in the EA, and could help lay the foundation for future management actions. We don't doubt the BTNF will carefully consider comments from Wyoming Game and Fish and local experts on anticipated impacts in potentially sensitive areas, as well as monitoring, enforcement or seasonal restrictions that may reduce those impacts. We agree that the project proposal presents important opportunities for studying these many unknown impacts that could be helpful to land managers on the BTNF and elsewhere in the future. We support any additional partnership resources the BTNF can utilize to meet this goal during implementation. Given the many "unknowns" identified in the BTNF's own scoping document, we also suggest the BTNF consider an adaptive management approach to allow for flexibility in management actions if a final decision results in unacceptable impacts.

In sum, we hope these brief scoping comments inform a draft EA that includes the following:

- A thorough analysis of direct and indirect impacts to the Palisades WSA.
- Proposed enforcement, implementation and monitoring efforts in the Teton Pass area, including anticipated limitations. For example, assuming that the referenced trail counters are unable to differentiate motorized e-bikes from mechanized bicycles, how will the BTNF monitor or address increased motor vehicle incursions resulting in the Palisades WSA?
- At least one action alternative that does not permit e-bikes on trails that directly connect or continue to system trails within the Palisades WSA.
- A description of the current condition of the Palisades WSA and the USFS's obligations to protect its wilderness character in accordance with the enabling legislation.

As always, please consider WWA a willing partner to increase education and awareness around the special designation for the Palisades WSA, especially as we approach the 40th anniversary of the Wyoming Wilderness Act. We appreciate your consideration of our scoping comments and look forward to engaging with the project as it progresses.

Respectfully,



Sarah Walker, Policy Director  
[Wyoming Wilderness Association](http://WyomingWildernessAssociation.org)  
swalker@wildwyo.org ,  
(307) 699 2379



Carlie Ideker  
Bridger-Teton Community Organizer  
Wyoming Wilderness Association  
carlie@wildwyo.org  
(307) 672-2751