



January 24, 2025

Mr. Tim Farris  
Bridger-Teton National Forest  
Jackson Ranger District  
340 N. Cache St.  
Jackson, WY 83001

Dear Mr. Farris:

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Draft Environmental Assessment (EA) analyzing Class 1 e-bikes on select Jackson Area Trails on the Bridger-Teton National Forest

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA appreciates the opportunity to review the Draft EA for Class 1 e-bikes in the Jackson Ranger District. While WDA did not provide scoping comments on the project, we do offer the following brief comments pertaining to the Draft EA and analyzed issues.

WDA's review of the Draft EA identifies only a single mention of "grazing" found on page 18 through a waiver on Munger Mountain allotment under the No Action Alternative. The mention pertains to cumulative effects considered from e-bike use. However, the Draft EA neglects to include any inclusion of livestock grazing under the "Issues Analyzed in Detail" or "Issues Considered but Not Analyzed in Detail."

WDA recommends at the very least, providing the public the necessary information such as allotment boundaries added to the map found on page 13, to definitively exclude overlap of increased recreation by e-bike users with active grazing allotments. WDA understands the Munger Mountain allotment is currently vacant with no active livestock grazing use, but we do not have any additional information for the remaining trails proposed under the Draft EA.

Recreation and livestock grazing often conflict where recreation users enter active livestock grazing allotments, leave gates open, cut fences, harass livestock, damage range improvements, conflict with working or guardian animals, etc. These effects are direct impacts to livestock grazing permittees, not simply a "cumulative effect" and should be analyzed accordingly.

WDA respectfully requests the project divulges any overlap with active livestock grazing use or include livestock grazing in the "Issues Considered but Not Analyzed in Detail" section, followed up with a brief narrative explaining why the proposed project does not negatively impact the livestock grazing permittees and industry.

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If the project does in fact overlap with any active livestock grazing allotments, we urge the BTNF incorporate educational kiosks to inform recreation users where active livestock grazing occurs with the additional trails proposed.

Finally, while Munger Mountain allotment may not have active livestock grazing, WDA supports interested livestock grazing permittees to apply for active use in the future. As a potential result of this use, it is imperative to not reduce Animal Unit Months or exclude the active use for the purposes or benefits of increased recreation and e-bike use, given livestock grazing on the allotment pre-dates this project.

We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto  
Director

DM/jw

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts  
Wyoming Game and Fish Department  
Wyoming County Commissioners Association  
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