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February 21, 2025

**Via Email**

Bridger-Teton National Forest

Jackson District

POB 1689

340 N. Cache St.

Jackson WY 83001

Attn: Todd Stiles, District Ranger

RE: Draft EA comments E-Bike Designations on Jackson Area Trails

Dear Mr. Stiles,

Back Country Horsemen of America (BCHA) of Teton County appreciates the opportunity to provide comments regarding the Draft Environmental Assessment E-Bike Use Designation on Select Jackson Area Trails.

Back Country Horsemen of America is a national 501(C) 3 non-profit organization dedicated to the following mission.

* **To** perpetuate the commonsense use and enjoyment of horses in America’s back country and wilderness.
* **To** work to ensure that public land remains open to recreational stock use.
* **To** assist the various government and private agencies in their maintenance and management of said resources.
* **To** educate, encourage and solicit active participation in the wise use of the back country resource by horsemen and the general public commensurate with our heritage.
* **To** foster and encourage the formation of new state Back Country Horsemen’s organizations.

Our grassroots members help carry forward our organization’s mission and values throughout the United States and Canada working closely with trail partners and local land management agencies to clear and maintain trails.

BCHA members volunteer their time and stock and travel over 1.1 million miles to locations to do volunteer work.

On behalf of our members and supporters, please accept the following comments on E-Bike Use Designation on Select Jackson Area Trails Draft Environmental Assessment.

* **General**

We acknowledge the growing popularity of e-bikes need to provide access and opportunities for diverse user groups to experience the Bridger-Teton National Forest (BTNF), not only for local users but for the millions of visitors. However, the desire to provide more opportunities for e-bike users needs to be addressed while maintaining ecological integrity and management of BTNF’s unique natural resources.

BCHA has no preference between the Proposed Action and Alternate 1. Both approaches have pros and cons. Thus, our comments are directed at issues of concern regardless of which proposal promotes them.

* **Safety**

Equestrian users generally are most concerned with access and the probability for conflicts on the trail. The Proposed would add e-bike usages to numerous trails. Included are several trails that currently allow mountain bikes, hikers and horses. Adding e-bikes to this mix will increase traffic and with their increased speed capability the risk of conflicts. As the risk of conflict increases, equestrians will often make decisions to abandon using these trails which equate to loss of access for this category of users. Specific trails of concern are Snotel, Phillips Ridge, Old Pass Road and Phillips Canyon.

* **Enforcement**

Although acknowledged in the draft document, we remain concerned regarding the ability of the Forest to enforce the access restrictions, usage and rules needed with the proposed changes. We are particularly concerned about illegal access into the Palisades Wilderness Study Area (WSA) and maintaining e-bike class restriction on designated trails. Forest staffing and funding issues, trail proximity to the WSA and difficulty in identifying e-bike classes all contribute to this issue. Removing access to trails in the WSA and a well-designed monitoring program would help mitigate this concern.

* **Wildlife**

Wildlife issues are generally an area that is outside the core mission and advocacy of BCHA. However, as backcountry equestrian users the opportunity to observe wildlife contributes to a positive recreation experience for our members. Thus, we are concerned with the extension of the access season for the Horsetail Creek Trial and the seasonal changes for the lower Munger Mountain trail system. These areas are critical for migrations, parturition and security of numerous wildlife species. The BTNF should ensure consistency with 2022 USFS guidance, Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions, that states, “Consider the impacts of Agency actions on ecological connectivity and wildlife corridors during broad-scale planning associated with the land management planning process and implementation of land management plans through localized project planning and decision-making.” Additionally, the BTNF should account for the available peer-reviewed migration research by recognizing known migrations and associated habitats in this project and in the forthcoming Forest Plan Revision. Specifically, the BTNF should analyze migration data provided by USGS Reports: Ungulate Migrations of the Western United States Volumes 1-5.

We urge you to consider our comments and include them in the FEIS and move to signing a record of decision that supports recreation, protects conservation values and protects wildlife

If you have any questions regarding our comments, please do not hesitate to reach out to us.

Sincerely,

Dan Smitherman

Teton Chapter, BCHA

Public Lands Liaison