

February 24, 2025

Todd Stiles

todd.stiles@usda.gov

Jackson Ranger District

Bridger-Teton National Forest

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

Dear Mr. Stiles,

The five undersigned conservation organizations appreciate the opportunity to provide input regarding the Draft Environmental Assessment (EA) E-Bike Use Designation on Select Jackson Area Trails. We appreciated the opportunity to provide scoping comments back in October 2023 and thank you for incorporating our input into the Draft EA.

The Wilderness Society (TWS) is a national non-profit organization that works to unite people to protect America's wild places. Founded in 1935, TWS is headquartered in Washington, D.C., with offices throughout the country, including in Dubois and Lander, Wyoming. TWS has over one million members and supporters nationwide, including approximately 300 active members in Wyoming. TWS aims to transform federal land management to prioritize climate resilience and biodiversity protection and help develop and advance policies for just and equitable public lands conservation on behalf of all people.

The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, Montana. Its five field offices, strategically located in Idaho, Wyoming, and the Wind River Indian Reservation, create opportunities to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem (GYE) for now and future generations. For more than 40 years, our more than 100,000 supporters from across the country have advocated for a science-driven, collaboration focused, and forward-thinking approach to keeping lands wild, rivers free-flowing, and iconic wildlife moving throughout a connected and vibrant landscape. Many of GYC's supporters enjoy the trail systems on the Jackson Ranger District, where secure habitat provides opportunities for wildlife viewing, hunting, and other types of recreation.

Founded in 1967, the Wyoming Outdoor Council (WOC) is the state's oldest and largest independent conservation organization. Our mission is to protect Wyoming's environment and quality of life now and for future generations. Our experts in ecology, wildlife, climate policy, Indigenous Traditional Ecological Knowledge, and air and water quality work to keep our air and drinking water clean, safeguard the state's millions of acres of incredible public lands and wildlife habitat, and build greater climate resilience in Wyoming. In addition to our broad goals of protecting Wyoming's air, water, lands, and wildlife, we work to empower individuals and communities to improve the policies that impact their lives.

Established in 1979, the mission of the Jackson Hole Conservation Alliance (JHCA) is "Advocating for wildlife, wild places, and responsible planning in Jackson Hole." The Alliance is Jackson Hole's oldest conservation organization and one of the only organizations that works on both public and private lands.

Wyoming Wilderness Association (WWA) is a statewide nonprofit organization with a mission to protect Wyoming's public wildlands through advocacy, education, and stewardship. Our organization represents the interests of nearly 5,000 conservation, recreation, and outdoor enthusiasts from across Wyoming and the United States who value Wyoming's wild landscapes.

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

Introduction

We recognize the growing popularity of e-bikes across the country and acknowledge the importance of providing access and opportunities for diverse user groups to experience the magnificent qualities of the Bridger-Teton National Forest (BTNF). Forest users travel from local, regional, national, and global locations to recreate within the boundaries of the Forest. The desire to provide more opportunities for e-bike users, however, must be considered alongside the utmost importance of maintaining ecological integrity and management of the BTNF's unique natural resources.

The BTNF contains wildlife values that are unique within the contiguous United States. Ungulate species such as elk, mule deer, moose, and pronghorn undertake significant seasonal migrations from high elevation summer range within the BTNF to lower elevation winter range on the Forest and adjacent BLM, State, Tribal, and private lands. These seasonal movements still occur because intact migration routes retain their functionality as a result of limited human development. The BTNF also supports a robust and growing population of grizzly bears. This iconic species utilizes the exceptional habitat within the Jackson Ranger District to complete annual life cycles. A defining characteristic of secure grizzly bear habitat is a lack of roads and human infrastructure, which is present throughout much of the Jackson Ranger District and adjacent Blackrock Ranger District to the north.

Horsetail Creek Trail

We agree with the findings of the Environmental Assessment that the Proposed Action to extend the open season dates for e-Bikes to Dec 1 (currently open July 1 to Sept 9) would be inconsistent with the existing Forest Plan's wildlife protections. The Path of the Pronghorn was recognized by the BTNF in a 2008 Forest Plan Amendment, stating, "All projects, activities, and infrastructure authorized in the designated Pronghorn Migration Corridor will be designed, timed and/or located to allow continued successful migration of the pronghorn that summer in Jackson Hole and winter in the Green River basin." Additionally, the trail overlaps with the State-Identified Upper Wind River mule deer migration corridor, which should be acknowledged in the EA. We support Alternative 1 in allowing for e-Bikes to use the existing trail during the current open season dates of July 1-September 9.

Munger Mountain Trails

We support Alternative 1 for the Big Munger Trail to keep the season dates consistent with motorcycle use (July 1 to Sept 9). The Big Munger trail overlaps with crucial winter range for elk and moose and migrating mule deer. We encourage additional signage at the trailhead and trail junctions to ensure compliance with the seasonal closures.

In August 2024, the State Board of Land Commissioners approved a 35-year recreational [lease](#) to Teton County in partnership with Jackson Hole Land Trust and Friends of Pathways for the 640-acre Munger Mountain State

parcel. The partners intend to revitalize and build onto the existing trail network that will link with the Forest Service trails. The BTNF needs to account for this increased use and potential conflicts with existing users and wildlife as it considers allowing for e-bikes on the lower trail network. Additionally, if nearby state run elk feedgrounds (South Park, Horse Creek, Dog Creek) close, the available and suitable winter range within the Munger Mountain region will become even more important to sustain ungulate populations. For these reasons, plus the enforcement challenge of keeping e-bikes off the Big Munger trail past Sept 9th, we recommend that the lower trails also keep the same season dates (July 1 to Sept 9) for e-bikes.

Shadow Mountain Area Trails

We support a modification of Alternative 1 for the Shadow Mountain Area. We support the removal of the Middle Fork Ditch Creek Trail (6.34 miles), which will reduce the recreational presence in critical wildlife habitat to the east of the Shadow Mountain Area. This area contains quality habitat for grizzly bears, elk, moose, and many other terrestrial and aquatic species. To reduce incursion of e-bikes in other adjacent areas of critical wildlife habitat, we recommend only class 1 e-bikes are allowed on the trails in this area. Additionally, we recommend the dates for e-bikes allowed on trails be July 1-September 9. These dates coincide with other areas of the Jackson Ranger District that contain critical wildlife habitat, such as the Horsetail Creek Area and Big Munger Mountain.

Mosquito Creek Area Trails

It is important to highlight illegal incursions of e-bikes into the Palisades Wilderness Study Area (WSA) from the Mosquito Creek drainage. Current illegal use will continue if measures are not taken to mitigate incursions into the WSA. New technology has allowed e-bike users to cover significant distances and navigate complex mountainous terrain with ease. Enforcement and education will be critical to prevent nonconforming uses in adjacent lands. We encourage additional signage in areas where the trail network borders the WSA. We support Alternative 1 in the Mosquito Creek Area.

Swinging Bridge Area Trails

We support seasonal restrictions on the proposed Swinging Bridge Area Trails. The hillsides adjacent to this area provide crucial winter range for mule deer and elk. Additionally, if the South Park and Horse Creek Feedgrounds cease supplemental elk feeding programs in the future, intact transition habitat and winter range south of the town of Jackson will be critical for wintering wildlife.

We support a modification to Alternative 1, with e-bikes allowed from July 1-September 9. This would comply with other proposed seasons and would offer consistency across the Jackson Ranger District. Enforcement and education of seasonal restrictions will be critical to encourage responsible recreation near areas of crucial winter range and sensitive wildlife habitat.

Conclusion

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.

The BTNF comprises a large part of the Greater Yellowstone Ecosystem, the largest intact ecosystem in the lower 48 states. It is blessed with abundant wildlife populations, thanks in large part to intact ungulate migration corridors. Research suggests that migratory herds show greater population abundance over non-migratory herds and provide an important role in our cultural, hunting, and conservation heritage. We encourage the BTNF to prioritize decisions that will ensure the continued functionality of our wildlife habitat including migrations and prioritize areas for increased recreational use that do not conflict with sensitive wildlife habitats.

Finally, we recognize these are tumultuous times for agency staff – we want to thank you for your tireless work stewarding our invaluable federal lands. We stand ready to offer our support to our federal partners.

Sincerely,

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