

February 24, 2025

Tim Farris, Trails and Wilderness Program Manager
Jackson Ranger District
Bridger-Teton National Forest

Project Tracking Number: 64890

Dear Mr. Farris,

Our collective sportsmen groups appreciate the opportunity to provide comments in response to the Environmental Assessment (EA) regarding E-Bike Use Designation on Select Jackson Area Trails. The Jackson area has seen a considerable increase in e-bike use and we are encouraged that the Jackson Ranger District is being proactive in addressing this issue. We are concerned that portions of the proposed action may negatively impact habitat viability for various wildlife species, including big game. Thank you for considering our comments.

Maintain Current Motorized Closure Dates

Motorized use, including e-bikes, can go further, and can do so in less time, than standard mountain bikes and therefore have more potential to spook wildlife and disrupt their seasonal movements. Seasonal closures were implemented to reduce stress on migrating and wintering big game. We support maintaining e-bike trail use from 7/01-9/09 and request that the current seasonal closures remain in place. Further, seasonal closures may be ignored or unnoticed by the public, and we ask that the BTNF work with local organizations to educate the public and effectively enforce them.

Sublette Antelope Migration

The Sublette Antelope herd utilizes the Gros Ventre River Valley to complete their migration between Grand Teton National Park and the Green River Basin in the spring and fall. Currently, this corridor is in the process of being officially designated by the state of Wyoming under Executive Order 2020-1. This designation will afford the corridor special conservation measures on public land. In 2008, this corridor was recognized by the Bridger-Teton National Forest and the forest plan was amended to include a new standard to ensure this migration continued unimpeded. The forest plan amendment states the following,

“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.”

Antelope in this herd generally migrate out of Grand Teton National Park and through the Horsetail Creek trail area during October or November. The current motorized access period of 7/01-9/09 will expand access for e-bikes and other motorized users while limiting additional impacts during sensitive periods in the spring, fall, and winter. Extending the open season dates for motorized uses from 9/09 - 12/01 would negatively impact migration and is in conflict with the management direction described in the forest plan.

Mule Deer Migration

The Sublette Mule Deer herd migrates roughly 150 miles during the spring and fall between the Bridger-Teton NF and the Red Desert area near Rock Springs, WY. This corridor was officially designated by the state of Wyoming in 2020 when Governor Gordon signed Executive Order 2020-1, Wyoming Mule Deer and Antelope Migration Corridor Protection. The Munger Mountain area is at the northernmost terminus of this migration and encompasses important summer range habitat for mule deer. These deer arrive on summer range around June and start their fall migration generally during October depending on weather conditions, and, the Big Munger Trail directly bisects this migration route. Allowing year round e-bike use on the lower Munger trails and extending open season to December 1 for the Big Munger trail would likely impact deer as they migrate. This could result in deer using less optimal habitat, altering migration habits and increased vigilance, which all increase stress.

The Upper Wind River mule deer migration corridor, which was recently identified by the Wyoming Game and Fish Commission, traverses the Horsetail Creek area. Deer that use this corridor migrate from summer range in the Grand Teton National Park area and the Gros Ventre range to winter range near Dubois. Extending open season dates for motorized uses to December 1 in these areas would likely negatively impact fall migration movements. Because of this, we request that the September 9 closure remain intact to facilitate mule deer migration.

Munger Mountain State Trust Land

The Munger Mountain area in particular contains crucial range and parturition habitat for moose, mule deer, and elk. Current motorized use timing restrictions aid in mitigating impacts to wildlife in this area which now includes a recreation lease on the Munger Mountain parcel of state trust land. This lease was designed to expand recreational opportunities while conserving habitat and was supported by many of the sportspeople’s organizations included in this letter. The current motorized access period of 7/01-9/09 will allow access for e-bikes and other motorized users

while limiting additional impacts during sensitive periods in the spring, fall, and winter. We ask that you respect the intention of that lease by retaining the existing motorized closures for e-bikes on National Forest trails.

Consistency with Current Policy and Regulations

When considering new and emerging uses of public lands, it is imperative that the Forest Service adhere to current policy to ensure compliance. We request that the USFS amend the proposed action to accommodate the following policies and regulations.

1) *Habitat Effectiveness Standard*

The proposed action will very likely have negative impacts to wildlife species in migration, parturition and crucial winter range. Much of these impacts are related to extending open seasons into crucial times of the year for big game. We request that the USFS adhere to this standard and retain the current wildlife closures.

2) *Desired Future Condition 2A*

Per the 1990 Bridger-Teton Forest Plan, motorized use, including e-bikes, is incompatible with portions of the area that are proposed for e-bike use. Not adhering to this DFC sets a dangerous precedent that motorized uses may be allowed in non-motorized areas. At a minimum, we request that the proposed plan be amended to not allow e-bike use in the lower portion of the Phillips Canyon trail. Further, this highlights the need for an updated forest plan that addresses new uses of BTNF lands, including e-bikes.

3) *Secretary's Memorandum 1077-013: Conserving and Restoring Terrestrial Wildlife Habitat Connectivity and Corridors in the United States*

In 2024, the USDA announced an effort to emphasize habitat connectivity on National Forest lands. Specifically, this memo aims to consider wildlife habitat connectivity and migration corridors during planning processes. We ask that the Agency incorporate this memo and adjust the proposed plan accordingly to ensure the longevity of connected habitats and wildlife health.

4) *Pronghorn Migration Corridor Forest Plan Amendment*

As mentioned above, in 2008, the Bridger-Teton Forest Plan was amended to include management direction for this vital migration corridor. The extended open dates for the Horsetail Creek area are at odds with this new standard. We ask that the BTNF review this standard and incorporate its guidance into the proposed plan to ensure migration habitat is conserved.

Recent Scientific Research

Elk have evolved to avoid predators and respond to disturbance by fleeing from perceived threats. When not planned, sited, or managed properly, human development and activities have been shown to cause this flight response and result in the behavioral avoidance by elk of otherwise suitable habitats.¹

Decades of wildlife research has documented the impacts of roads and trails on elk behavior and habitat use.² A 2018 study on elk response to trail-based recreation found that elk avoided hikers and mountain bike riders by staying about 1,795 and 2,172 feet away (547m and 662m, respectively) and avoided ATVs by about 2,884 feet (879m).³ This avoidance likely reduces the acreage of viable habitat available to elk herds.

In order to survive, elk must be able to move freely between seasonal habitats to access high quality forage and other essential resources throughout the course of the year. Disturbance to elk in production areas and summer concentration areas can disproportionately impact elk from May through July when they use these habitats for birthing and rearing young. Wildlife researchers have documented that trail-based recreation in these habitats during early summer can negatively impact elk calf survival and elk herd stability.⁴

Organizations Consulted

We appreciate that Bridger-Teton National Forest staff has consulted with a number of organizations that have a vested interest in the outcome of this proposal. The organizations consulted, however, lack the sportsmen and sportswomen voice that represents thousands of people who use the BTNF regularly. Our organizations represent a unique perspective that can help forest service staff in shaping public land policy. Please do not hesitate to reach out to our organizations on future planning efforts.

¹ Wisdom, M. J., H. K. Preisler, N. J. Cimon, B. K. Johnson. 2004. Effects of Off-Road Recreation on Mule Deer and Elk. Transactions of the North American Wildlife and Natural Resource Conference 69:67-80. https://www.researchgate.net/publication/228447373_Effects_of_Off-Road_Recreation_on_Mule_Deer_and_Elk

² Washington Department of Fish & Wildlife. 2013. A Brief review of the scientific literature on elk, roads, & traffic. 26 pp. <https://wdfw.wa.gov/sites/default/files/publications/01491/wdfw01491.pdf>

³ Wisdom, M. J., H. K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk response to trail based recreation on public forests. Forest Ecology and Management 411 (2018) 223-233. <https://doi.org/10.1016/j.foreco.2018.01.032>

⁴ Phillips, G.E and Alldredge, A.W. 2000. Reproductive success of elk following disturbance by humans during calving season. Journal of Wildlife Management. 64(2):520-530

Conclusion

Public National Forest Lands in Teton County provide crucial habitat for a myriad of wildlife species and support some of the longest ungulate migrations in the continental United States. We encourage the BTNF to prioritize the continued viability of migration corridors and crucial wildlife habitat by maintaining current seasonal closures and focusing recreational use on areas that do not conflict with seasonal wildlife habitats.

We appreciate the opportunity to comment on this matter. Please do not hesitate to contact us with any questions.

Sincerely,

Nat Paterson
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Wyoming Wildlife Federation

Josh Metten
Wyoming field manager
Theodore Roosevelt Conservation Partnership

Buzz Hettick
Wyoming Chapter Co-Chair
Backcountry Hunters and Anglers