



Date: 8/21/25

To: Bridger-Teton Forest Plan Revision Team
340 N. Cache Street
Jackson, WY 83001

Dear Bridger-Teton Forest Planning Staff,

This written comment is in response to the published draft assessment and is submitted by Advocates for Multi-use of Public Lands (AMPL). We would like to first acknowledge the extensive amount of work your team has put into producing this important document, and thank you for your commitment to managing 3.4 million acres of some of our Nation's most valued public lands. We cannot emphasize enough the importance of this multi-year planning process. As lawmakers continue to propose laws enabling the sale of our public lands, it is more important now than ever that land managers sign resource management plans that successfully balance all of the components under multiple use.

Introduction to AMPL

Before commenting on specific elements of the Draft Assessment, we feel it is important to introduce our organization and the people who we represent. AMPL is a Jackson, WY based non-profit whose primary mission is bringing our region's diverse recreation groups together in a unified voice to advocate for recreational access to our public lands. We believe that diverse user groups on our landscape lead to a broader coalition of public land stewards. Our supporters include those who mountain bike, horseback ride, dirt bike, hunt, fly fish, hike, snowmobile, ski, snowboard, snowshoe and more. While we primarily work with land managers on the Bridger-Teton, we also work closely with neighboring districts on the Caribou-Targhee.

Our work goes beyond advocacy and includes campaigns targeted to educate our community about proper etiquette, respect for other users, and following regulations surrounding recreation access. Since the summer of 2019, we have employed a trail crew tasked with maintaining motorized and non-motorized trails on the Jackson District. For the summer of 2026, we will also employ a separate crew tasked with maintaining motorized trails on the Greys River District.

We feel strongly that our programming must complement our robust advocacy work. When we advocate for expanded access for a particular user group, we are committed to stepping up and working with land managers to ensure trail work is getting done, educational campaigns are ready to accompany new/changed use, and we are willing to support the Forest in these times of reduced staffing.

In 2017, AMPL's roots took hold during Teton County's participation in the Wyoming Public Lands Initiative. The threat of losing access to Shoal Creek and Palisades Wilderness Study Areas (WSAs) rallied thousands of multi-use recreation enthusiasts to stand up for sustainable, diverse recreation. This group of recreationists believes in protecting these valued landscapes while managing them to allow for multi-use recreation. While AMPL represents all user groups, we find ourselves consistently having to stand up for motorized recreation. Historically this group has seen the largest reduction of access to public lands over the last several decades, and in some cases, little to no access exists for some user groups today. In a lot of ways, AMPL represents a minority group in Teton County. Motorized recreationists are often labeled in negative ways and made out to be villains who don't care about the wild places we recreate. In reality, that is far from the truth. We are conservationists, we care about the environment, and we choose to recreate in a way that allows us to access rugged, wild, scenic landscapes. This is how we develop a deep appreciation for these places.

The release of the Draft Assessment demonstrated how complex and challenging it is for the BTNF to manage over 3.4 million acres of public lands. Balancing social, biological, geological, historical, and ecological impacts when making any Forest decision is an extremely delicate process. AMPL's comment is intended to provide feedback on how the last 35 years of Forest management has impacted our constituents, highlighting successes and challenges. It is our intent to be a constructive, honest voice that can contribute to building an accurate, thorough final Assessment document during the Forest Plan Revision process. Thank you for taking the time to consider our viewpoints pertaining to multi-use recreation.

Draft Assessment and Supplemental Assessment Information Comments:

Our team has extensively reviewed both the 70 page Draft Assessment (DA) and the 566 page Supplemental Assessment Information (SAI) and have compiled a list of notes pertaining to specific points laid out in both documents.

1. *Format/communication.* First AMPL would like to thank the BTNF Forest Planning team for hearing our comments at the partner's workshop in Pinedale on 5/7/25. At that meeting we expressed our concern about the format and diction the Forest Service typically uses in documents requiring public input and how hard it can be for the general public to discern the information communicated. Between the release of the 70 page summary and supplemental information documents, our team was impressed by how the Draft Assessment was presented. We hope that the BTNF Forest Planning team can continue to format their work in such a way that people can easily read and understand future documents. This is crucial to receiving vital input from the public.
2. *ROS.* Page 41 discusses the Recreation Opportunity Spectrum (ROS). AMPL feels it is important to consider lands adjacent to the BTNF when making future decisions. Both the DA and SAI discuss how lands surrounding the BTNF have significant impacts to things like wildlife, infrastructure, and our ecosystems in general, but neither document factors adjacent lands when discussing the ROS. On the Jackson District specifically, it

is imperative that the BTNF acknowledges that the neighboring Grand Teton National Park offers many opportunities for both primitive and semi-primitive non-motorized recreation, similar to those found on the BTNF.

While AMPL recognizes the BTNF has no control in managing recreation in the National Park, we feel strongly that the BTNF considers the different recreation opportunities available on all lands adjacent to population centers. For instance, if a nordic skier is looking for new trail systems to enjoy after extensively recreating in Cache Creek, they have the option to try one of the private nordic trail systems in Teton County, or take a short drive to Grand Teton National Park where nordic skiing is allowed. A snowmobiler, on the other hand, is limited to solely accessing the National Forest because it is the only place where winter, motorized recreation is allowed to occur. In the summer, the same holds true for mountain bikers and e-mountain bikers (e-MTB).

3. *Trail use specificity.* On page 48 under the discussion of the BTNF's trail system, AMPL feels it is important to be more specific about the types of trails outlined in table 9. While we understand the desire to display trail mileage simply, the reality is that trails are much more nuanced than what is described in the table. AMPL recommends the planning team task each district with categorizing and totaling their trail mileage in a more appropriate way. For instance, a "motorized trail" can range from single-track trails where dirt bikes and e-MTBs are allowed to much wider trails that allow for the use of off-road capable, full size vehicles. While legally, dirt bikes and e-MTBs are allowed on those wider trails, they simply don't provide users with the experience they are seeking, and therefore shouldn't be considered as a "benefit" to them.

While we acknowledge that this level of specificity is most important during travel management, it cannot be overlooked during the current Forest Plan Revision process, as it has direct impacts to the Forest's ROS. To elaborate on our above example, the BTNF often groups all summer, motorized recreation (i.e. dirt biking, e-mountain biking, four wheeling, side by side riding) into one user group, when in fact that term is far too generalized. There are plenty of individuals using the BTNF who are passionate about one of those forms of recreation, but not the others. For instance, land managers must acknowledge that when they claim the Gros Ventre/Teton Zone has 80 miles of motorized trails, the reality is individuals who ride dirt bikes have access to about 45 miles of single-track and those who ride four wheelers have access to about 35 miles of 50" trails. The mileages in this example were sourced from page 48 of the DA, table 9.

AMPL feels it is imperative to critically evaluate the discrepancy between motorized and non-motorized access displayed on page 48 in table 9. When we break down the percentage of summer trails available to motorized vs. non-motorized users, the discrepancies in ROS are alarming: Gros Ventre/Teton- 7% motorized, Wyoming/Salt River- 16%, and Wind River- 3%. Seeing these numbers broken down in the DA confirms the frustrations that we have heard from our constituents of having inadequate access opportunities to public lands. Again, while AMPL recognizes this is a Travel

Management issue, the ground work for expanded access needs to start at a Forest Planning level.

4. *Travel management.* AMPL asks that the BTNF perform a review of the Travel Management decisions made on the Jackson District in 2009. We have extensively researched to understand why summer, motorized recreation was closed in the Palisades Wilderness Study Area (WSA) after the Wyoming Wilderness Act of 1984, which allowed for pre-existing uses to continue. While snowmobile and heli ski outfitting is clearly permitted to continue due to its congressional protection, the summer motorized closures present confusion.

In conversations with BTNF recreation staff, we have been told trails were closed because there was no historic use, or they dead end at the WSA boundary. For 3 reasons, we find it hard to believe there was no historic use of dirt bikes in the WSA. First, the Indian Creek trail lies within the WSA and is currently on the Motor Vehicle Use Map (MVUM). This, we have been told, was due to the fact that there was documented historic use prior to 1984. Second, while clearing non-motorized trails in the Palisades on foot, our trail crews have documented a carsonite post showing the Divide Trail at Mud Pass as open to dirt bikes, despite it not being listed on the MVUM (see attached photo). This confirms that dirt bikes once used trails on the north end of the WSA. Third, we find it hard to believe there was no documented, historical use of dirt bikes in the WSA if there was clear use at both the south and north ends of the mountain range. A review of Forest Service documents, including the Jackson District's 2009 Travel Management Plan, does little to clarify these questions.

AMPL would also like clarification on the 2009 Travel Management Plan process given its timing in relation to the submission of an official map of the Palisades WSA. Our research shows that per the 1984 Wyoming Wilderness Act, the Forest Service was mandated to submit an official, certified map of the Palisades WSA boundary by 1987. We have not been able to find a record of a map submission to Congress prior to June of 2014, 5 years after the 2009 Travel Management Plan was signed.

Per these facts, we find it imperative for the BTNF planning team to review the decision making processes surrounding the 2009 Travel Management Plan and evaluate whether or not it was appropriate to be closing trails without having a certified, legal map of the WSA. While most of the staff who worked on these projects are likely retired and no longer employed by the BTNF, AMPL feels this would still be relevant information for the Forest Plan Revision Assessment phase and could help guide current land managers in making future decisions.

5. *Sustainable Recreation.* Under this segment of the SAI document on page 303, planning staff quote a core concept within the 2012 Planning Rule: "Nationally, sustainable recreation is defined as the set of recreation settings and opportunities on the National Forest that are ecologically, economically, and socially sustainable for present and future

generations". We feel the BTNF has successfully managed recreation to be sustainable based on two of the three criteria, ecological and economical, but is struggling to manage for social sustainability on certain parts of the Forest. As described on page 43 of the DA under "The Challenge Ahead", "social conflict will be more challenging to address than ecological effects". It goes on to say "to avoid conflict, there will be increasing pressure for managers to separate conflicting uses, either spatially or temporally, or modify visitor expectations to accept more shared use".

AMPL agrees that social conflict on trail systems will only continue to get worse as our region experiences population growth, unless the BTNF changes their management strategy in a way that helps develop a culture that accepts shared use. We feel an important step could be taken to help achieve this goal. All users deserve adequate recreation opportunities, including motorized users. In the above quote, the words "separate conflicting uses" makes us nervous, because historically that means removing motorized users from the landscape without adding any new areas. This continued loss of access leaves motorized users feeling undervalued by the Forest Service, despite the countless hours and dollars they have contributed to trail work, signage, and infrastructure projects such as trailhead renovations.

On the Jackson district, as described above, under point number 2 surrounding the Forest's ROS evaluation, the inadequate access comes from a massive discrepancy between motorized and non-motorized trails. On the Greys District, this discrepancy is less, and we know from conversations with recreationists in Star Valley, there is demand for non-motorized trail systems closer to population centers. AMPL would support working with user groups in Star Valley and the Greys River District to strategically add new, non-motorized recreation opportunities, as long as it does not result in a net loss of motorized access.

On other Forests, such as the Caribou-Targhee and the Salmon-Challis, AMPL's team has seen what successful, shared-use trail systems can look like. The key to those areas is that all user groups have options to access high quality recreation opportunities in both a motorized and non-motorized setting. Because there is adequate opportunity for all user groups, when people are on a shared use trail, they know and expect to see uses different than their own. Non-motorized users are also grateful for the trail clearing and tread work that the motorized community performs each season. This shared use mentality takes buy-in from all users, but it starts with a Forest that provides varying user groups the opportunity to work together, rather than continually segregating users.

Setting visitor expectations to be more accepting of shared use is of the utmost importance, and this goal should always be a priority of any Forest's recreation department. After all, an often recited motto of the Forest Service is "the land of many uses". At AMPL, it is one of our most prioritized topics for public education. We strive to build a culture of acceptance and recognition that one form of recreation is not more valuable than another. We feel the Forest should be sharing that same messaging, but

until the BTNF takes meaningful measures to provide adequate access for recreation groups that have been minimized, this will not be possible.

A useful tool that can be used in messaging is educating users about specific funding sources used for both trail work and recreation infrastructure projects. For example, the general public is often ignorant to the fact that the vast majority of winter grooming and trailhead plowing performed on the BTNF comes from funds generated by the sale of snowmobile stickers and distributed by Wyoming State Trails. Explaining the financial burden it takes to maintain trails and access points can be a great starting point to developing a culture of shared use public lands.

6. *Recreation opportunities close to population centers.* As shown by the trail counter data displayed in table 51 on page 319 of the SAI, there is a lot of value in having access to public lands close to population centers, as these trail systems receive the most use. Cache Creek, and its proximity to the town of Jackson, is invaluable for giving residents an easy escape from day to day life by offering people options to bike, hike, nordic ski, fat bike, or snowshoe. This is an amazing resource for recreationists that needs to be managed to allow continued access and high quality recreation experiences.

The value of having adequate recreation opportunities close to population centers is acknowledged in the DA, and is prioritized by the Forest for non-motorized users, but the Forest does not prioritize this for motorized users. While there may be a sufficient amount of motorized opportunity on neighboring districts and on neighboring Forests, such as on the Greys District and Caribou-Targhee, they require a significant (hour or more) drive for people who live elsewhere. On the Jackson District, the 3 motorized single track trail systems each have about 12-14 miles of rideable trail. If all three systems could be linked together via motorized trail, the total mileage would be sufficient for most people to ride a full day without riding the same trail twice. Instead, each system is separated by a 30-60 minute drive on paved roads. For users looking to ride more than an hour or two, they are forced to ride the same trails multiple times, or drive to another district or Forest where there are adequate riding opportunities.

This is another example of how motorized users have been pushed off the Jackson District and forced to travel in order to enjoy other public lands, while non-motorized users have numerous opportunities 5-30 minutes from town. This management style for motorized recreation is now negatively impacting those who want to access public lands on e-MTBs, as they are regulated as a motorized vehicle and therefore also have very little access. AMPL asks that throughout this Forest Plan Revision, the BTNF works to find new, high value opportunities for motorized users on the Jackson District.

7. *Recreation impacts to wildlife.* AMPL's constituents also value the health and wellbeing of our region's wildlife. Many of our supporters are not only passionate recreationists, but sportsmen and women as well. We fully acknowledge and understand that all forms of recreation come with an associated impact to our environment and the wildlife that rely

on a healthy ecosystem to thrive. Maintaining migration corridors and high quality summer/winter habitat are key to sustaining the wildlife that the majority of public land enthusiasts value greatly.

Our request of the BTNF forest planning team is to look critically at the impacts recreation has on wildlife and be extremely targeted in minimizing those impacts. It is important to ensure management strategies are treating issues that have population level effects and not just individual effects. For instance, per page 146 of the SAI, grizzly bear populations are successfully recovering and populations are rising. Further recreation restrictions should not be considered if current restrictions are working. Per page 184 of the SAI, 2021 population surveys of the state's elk herds indicate their numbers are 30% over objective. Further restrictions to recreation should not be implemented to further bolster elk populations. When the BTNF deems it necessary to reduce human conflict in summer/winter habitat or migration corridors, we ask that the planning team make calculated, precise decisions to achieve those goals with minimal impact to recreational users.

8. *Evolution of recreation types.* AMPL appreciates that the BTNF planning team acknowledges the significant change in how users access the Forest. It is no surprise that in the last 35 years, the ways in which people recreate has evolved and we will likely see even greater changes over the next 35 years. We ask that the BTNF update their Forest Plan to reflect these new recreation trends and ensure there is better direction for how to provide adequate opportunities for all users while balancing ecological concerns. The Forest needs to adapt a management strategy that provides more flexibility so that when new technologies arrive, users are not left waiting 35 years for the next plan revision.

The advent of electric bike technology is one of the best examples of a new use not conforming to the 1990 Forest Plan. This became particularly apparent in January 2025 with the release of the E-Bike Use Designation on Select Jackson Area Trails Draft Environmental Assessment. Within the draft EA, it was acknowledged that the bottom of the Phillips Canyon trail lies within Desired Future Condition (DFC) 2A, which emphasizes a management of non-motorized use. By the BTNF staff's own admission, electric mountain bikes were not even in existence when this DFC was established. While clearly this management strategy was intended to keep dirt bikes and ATVs off the trails in this area, it has created problems for even considering the allowance of e-MTBs to access Phillips Canyon. This is a perfect example outlining why the BTNF Forest Plan needs revision.

9. *Winter recreation.* AMPL would like to commend the BTNF for maintaining equitable, balanced access for both motorized and non-motorized winter users. In areas where intact winter range is of top concern, the BTNF has appropriately created restrictions that keep users on designated trails. These areas are often in lower elevation terrain where snow depths are adequate to snowmobile or ski only on trails, but would be hazardous

off trail. In areas that have deeper snowpacks, cross-country or backcountry snowmobiling and skiing is largely open on the Forest. These restrictions are adequate, serve a specific purpose, and are largely followed by users.

On page 297 in the SAI, the planning team writes: “winter recreation planning to address non-motorized, motorized, and wildlife values will be particularly challenging”. While this statement is very generalized, AMPL assumes this will largely be due to social conflict, as there are already many protections put in place for wildlife. This is a situation where the Forest has an opportunity to educate all users to be more accepting of shared use. All of the areas where winter motorized recreation occurs are in places with significant historical use. Where legally permitted, snowmobilers have been enjoying these backcountry settings for many decades, sharing public land with all users.

Nearly half of the BTNF is already closed to winter motorized recreation, giving individuals who want to avoid being around motorized use a plethora of options to do so. What isn’t discussed in depth in either the DA or the SAI is winter use on Teton Pass. While the pass is split between the BTNF and CTNF, AMPL once again feels it is crucial when evaluating the ROS to consider neighboring public land agencies. On Teton Pass, there are eight popular access points for recreationists (Trail Creek, Phillips Bench, top of the pass overflow, top of the pass, Coal Creek, the weigh station, and the state line). All of these access points are important for backcountry skiing and snowboarding and are highly valuable to our community. Of those eight access points, only one allows for motorized use, Phillips Bench.

While technically, popular ski terrain south of the pass is open to motorized use in the winter, the terrain is difficult and remote to access from a designated motorized trailhead and therefore receives little to no use by the motorized community. We are not advocating to change any designations to restrict motorized access off Teton Pass, but we hope to bring to light how current management and use patterns are currently working to avoid conflict. There is also a motorized closure to the south of Teton Pass prohibiting snowmobiles from riding south from Phillips, therefore providing non-motorized users with opportunities to recreate away from any motorized use.

The one area where conflict does occasionally arise is at the one trailhead where motorized use is allowed, Phillips Bench. AMPL documented an incident where an individual used a saw to cut over 10 live trees, leaving them across the traditional route snowmobilers take to access the terrain from Phillips Bench (see attached photos). Other reports we have received include skiers aggressively accusing snowmobilers of riding closed terrain, when in fact they are well within legal boundaries. This is another example of where the BTNF could further educate visitors in an attempt to create a culture that is more accepting of shared use. Phillips Bench is an extremely high value motorized area for snowmobilers who might only have a half-day to recreate and for those who use snowmobiles to access slopes for skiing and snowboarding, and we feel strongly that it should remain open to motorized use.

AMPL is grateful for the BTNF's management of winter recreation on the Forest. Throughout the 3.4 million acres, there are many options for people of all ability levels and varying use types to get outside and recreate. There is a balance between motorized and non-motorized recreation opportunities, and there are many opportunities to recreate close to population centers. We ask that throughout this Forest Planning process, the planning team strives to maintain this balance while continuing to manage secure winter range habitat for wildlife.

Conclusion

AMPL recognizes that recreation makes up one component of a complex Resource Management Plan on an expansive 3.4 million acre landscape. There are many considerations which will be challenging but necessary to account for while revising the Forest Plan. We are grateful the forest planning staff recognizes the importance of recreation from the stance of human health, economic growth, and how it provides people with a sense of connection to the forest. We greatly appreciate these values and outdoor recreation brings all three to our communities in such a meaningful way.

As the forest planning team moves forward in this process, we ask you to consider two of our core values in our mission. First, the Forest belongs to all Americans and should be managed to be inclusive to everyone, providing high quality recreation opportunities for all users. Second, diverse user groups on our public lands leads to more public land advocates and stewards. As stated in the beginning of our comment, our country needs public land advocates now more than ever. Excluding people from accessing the National Forest is not how we build a constructive coalition of people willing to steward our lands for the next generation. We thank the BTNF for the opportunity to provide input throughout this Forest Plan Revision process.

Will Mook
Executive Director
Advocates for Multi-use of Public Lands



Photograph taken on 8/16/22 on the Divide Trail near Mud Pass in the Palisades Wilderness Study Area.



Photograph submitted to AMPL on 4/1/23 depicting trees intentionally felled onto the main snowmobile route on Phillips Bench.



Photograph submitted to AMPL on 4/1/23 depicting trees intentionally felled onto the main snowmobile route on Phillips Bench.