



WYOMING GAME AND FISH DEPARTMENT

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October 30, 2023

WER 15143.00
Forest Service
Jackson Area Trails
E-Bike Use Designation
Teton County

Timothy Farris
25 Rosencrans Lane
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Jackson, WY 83001
Timothy.farris@usda.gov

Dear Mr. Farris,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed Jackson Area Trails E-Bike Use Designation in Teton County. The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The Department commends the Bridger-Teton National Forest (BTNF) for addressing the increased use of e-bikes within the Jackson Ranger District. Department personnel have noticed a marked increase of e-bike use in recent years with much use occurring in locations not currently authorized. On Wyoming Game and Fish Commission lands, e-bikes are classified as motorized vehicles and their use is limited as such. The Department's past recommendations to the U.S.D.A. Forest Service (Forest Service) regarding e-bike use on National Forest lands have been to recognize and analyze e-bikes as a unique form of transportation and restrict their use to existing, motorized trails. The current Proposed Action on the Jackson Ranger District would expand use to non-motorized trails, which deviates from permissible uses on our managed lands and from our past recommendations to the Forest Service.

E-bikes are a relatively novel form of disturbance and, as such, thorough assessments regarding impacts to wildlife are few. The one available study that addresses impacts of e-bikes specifically on wildlife suggest a long list of potential negative impacts including an immediate avoidance response, changes in habitat use, diurnal activity patterns, and reduced reproductive success (Kuwaczka et al. 2023). Ample scientific literature exists linking impacts of motorized and non-motorized use more broadly to various big game species. Notably, Wisdom et al. (2018) studied impacts of recreational all-terrain vehicle (ATV) use, mountain biking, hiking, and horseback riding on elk avoidance behavior in Oregon. They found all disturbance types alter elk behavior

with ATV use eliciting the most intense avoidance response followed by mountain biking. Based on available literature for e-bikes and other forms of similar recreation, negative impacts to wildlife from increased e-bike use is certain although the degree of impacts is unknown.

The Department acknowledges the expanded interest and use of e-bikes and agrees that facilitating e-bike use in less sensitive wildlife habitats may be done with minimal harm to wildlife, hunter opportunity, and wildlife viewing. The Department is concerned, though, that allowing expanded use of e-bikes in more sensitive wildlife habitats may be detrimental given the known impacts of motorized and non-motorized recreation on wildlife. As such, we offer the following considerations:

Teton Pass – The Teton Pass area is a popular outdoor recreation destination and the trails targeted for expanded e-bike use are already heavily used by mountain bikers and do not overlap crucial wildlife habitats. The Department has no concerns with expanding allowable uses to include e-bikes on the trails as proposed.

Horsetail Creek Trail – The Horsetail Creek Trail is currently used lightly by mountain bikers and lightly by e-bike users. The area is popular with hunters and the trail system overlaps crucial winter range for elk, big horn sheep, and moose. However, the Department supports the expanded period of allowable use for e-bikes on the Horsetail Creek Trail as proposed. The negative impacts to wildlife of extending the use period to e-bikes are expected to be minimal and the increased access opportunity may be beneficial for hunters that may not have been able to access the area in other ways.

Munger Mountain - The trail system on Munger Mountain proposed for expanded e-bike use includes both moose and elk crucial winter yearlong range, is important for elk parturition, and is a popular hunting destination. Munger Mountain is also surrounded by private land that elk can and do sometimes seek refuge on during the hunting season, which limits public land hunting opportunity and the Department's ability to maintain herd objectives.

The current seasonal closure period on Munger Mountain was established to protect elk during the parturition season and to minimize elk avoidance of public land during the hunting season. Given the well-established relationship between recreational use and big game avoidance behavior, and importance of Munger Mountain for wildlife and public hunting, the Department recommends maintaining motorized use and non-motorized use as currently allowed. Expanding e-biking opportunities on Teton Pass and the Horsetail Creek Trail will likely result in minimal negative impacts to wildlife and hunting opportunity while providing e-bike users additional opportunities on the BTNF.

Expanded Use Paired with Monitoring – The Department supports the approach of incremental increases in e-bike use as proposed. We further support monitoring of user numbers as a result of any increased allowable e-bike use. The Department recommends the Jackson Ranger District also

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consider impacts to wildlife in addition to changes in trail conditions and trail user experience. Department personnel welcome the opportunity to further discuss options to assess those impacts.

Enforcement – The Department supports the requirement to have e-bike users purchase a decal as proposed. The decal requirement may assist with enforcement, although it is unlikely to curb illegal use. We are concerned expanding legal access may also facilitate and expand illegal use. As previously stated, Department personnel have noticed a substantial increase in e-bike use across the BTNF. Much of the use has been off of designated motorized routes. The ease at which e-bike users can access previously difficult to reach locations, and the relative low overall noise associated with e-bikes, has created noncompliance and enforcement issues. We recommend the Jackson Ranger District formally consider enforcement issues and provide a clear path to address enforcement, beyond decal requirements, prior to approving the Proposed Action.

The Scoping Letter states the Proposed Action was developed in coordination with the Jackson Ranger District and the Teton E-Mountain Bike Coalition. If further expansion of allowable e-bike use is to occur, the Department welcomes the opportunity to provide input early during the process of identifying site locations to ensure impacts to wildlife and wildlife habitat are minimized.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Ross Crandall, Habitat Protection Biologist, at (307) 367-5615.

Sincerely,



Will Schultz
Habitat Protection Supervisor

WS/rc/kgb

cc: U.S. Fish and Wildlife Service
Chris Wichmann, Wyoming Department of Agriculture

Literature Cited

Kuwaczka, L. F., Mitterwallner, V., Audorff, V., & Steinbauer, M. J. (2023). Ecological impacts of (electrically assisted) mountain biking. *Global Ecology and Conservation*, e02475.

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