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September 4, 2026

David Richey
Acting Field Manager
BLM Pinedale Field Office
1625 W. Pine Street
Pinedale, WY 82941-0768

Re: Proposed Skyline Drive mountain bike trail.

Dear Mr. Richey,

We are writing to share our concerns regarding the Skyline Drive Trail proposal submitted by the Sublette Trails Association (STA), and to request that the Bureau of Land Management (BLM) prepare an Environmental Assessment with public scoping and grant Wyoming Game and Fish Department (WGFD) formal Cooperating Agency status in its review of this proposal.

Jackson Hole Wildlife Foundation has worked to protect wildlife across western Wyoming and eastern Idaho for more than three decades, including in Sublette County. Central to our mission is close collaboration with agency partners — providing science, volunteer labor, and support for conservation of wildlife and habitat.

Our partnership with the BLM Pinedale Field Office (PFO) spans nearly a decade. Together, we have worked to modify fences on grazing allotments that historically caused high rates of injury and mortality to Greater Sage Grouse and migrating ungulates. These modifications include seasonal management — raising fences for cattle grazing and lowering them during wildlife movement periods — allowing the land to support both grazing and safe passage for wildlife. We also hosted the LaBarge Restoration Specialist in 2024-25 who worked alongside BLM range and biology staff on riparian restoration in the LaBarge Landscape, basing herself in the BLM PFO. We recently received a Foundation for America's Public Lands grant, co-written with PFO staff, to establish a collaborative focused on wetland restoration across Pinedale BLM lands.

We offer this context simply to underscore that our concerns about the Skyline Drive Trail proposal come from a place of genuine partnership and shared commitment to this landscape.

Concerns Regarding the Skyline Drive Trail Proposal

The parcels under consideration for the Skyline Drive Trail represent some of the most ecologically significant wildlife habitat in the region, and we believe the proposal warrants great scrutiny to determine its

Critical Wildlife Habitat

This area serves as crucial winter range for moose, elk, and mule deer (Fig. 1), and functions as both a migration corridor and stopover habitat for mule deer (Figs. 2 and 3). WGFD has designated these areas to protect Wyoming herds on their most valuable habitat where any disturbances should be avoided to minimize stress and injury when animals are most vulnerable. Unfortunately, a substantial body of research demonstrates that trail-based recreation degrades habitat value well beyond the physical footprint of the trail. Wildlife perceive recreationists as a predation risk and respond with heightened vigilance, flight, and displacement from otherwise suitable habitat.¹ Studies of elk on public lands found that animals shifted away from trails during all forms of recreation, with mountain biking eliciting stronger displacement than hiking or horseback riding, and that disturbance reduced time spent feeding and resting.² These responses carry real energetic costs. Repeated disturbance forces ungulates to draw down limited fat reserves with consequences for overwinter survival and reproduction. A global systematic review found that over 90% of studies examining recreation effects on wildlife documented at least one impact, the majority negative, and that non-motorized activities such as biking and hiking were implicated as often as motorized use.³ In short, designations like crucial winter range and migration stopovers only fulfill their purpose when human disturbance within them is genuinely minimized.

Stopover sites for migratory animals are disproportionately important. Research on the Sublette Mule Deer Herd shows that migrating mule deer spend as much as 95% of their migration time at stopover sites, refueling before continuing their journey,⁴ and the methodology WGFD uses to designate stopover areas captures only the most heavily used portions of the corridor, making these designated areas among the most critical points along the entire migration route (WGFD 2017 [Sublette Mule Deer Migration Corridor Assessment](#)). The Sublette Mule Deer Herd's health depends on the integrity of this landscape.

The importance of this specific area was recently underscored, when two WGFD GPS-collared mule deer that are now summering in Grand Teton National Park spent the entire month of May on these two parcels and the surrounding area (Fig. 4). These animals used the area to rest and recover, recharging before continuing migration. These behaviors speak directly to the irreplaceable value of undisturbed habitat at key stopover locations.

¹ Frid, A., and L.M. Dill. 2002. Human-caused disturbance stimuli as a form of predation risk. *Conservation Ecology* 6(1):11; Taylor, A.R., and R.L. Knight. 2003. Wildlife responses to recreation and associated visitor perceptions. *Ecological Applications* 13:951–963.

² Naylor, L.M., M.J. Wisdom, and R.G. Anthony. 2009. Behavioral responses of North American elk to recreational activity. *Journal of Wildlife Management* 73:328–338; Wisdom, M.J., H.K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, and M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411:223–233.

³ Larson, C.L., S.E. Reed, A.M. Merenlender, and K.R. Crooks. 2016. Effects of recreation on animals revealed as widespread through a global systematic review. *PLoS ONE* 11(12):e0167259.

⁴ Sawyer, H., and M.J. Kauffman. 2011. Stopover ecology of a migratory ungulate. *Journal of Animal Ecology* 80:1078–1087.

Existing Recreation Opportunities Make This Trail Unnecessary

Adequate trail opportunities already exist in the area. The Elk Chase Trail on the adjacent Bridger-Teton National Forest, developed by the STA four years ago, already accommodates hiking, equestrian, and mountain bike use. Notably, even during peak season in July and August, that trail sees fewer than 1.5 mountain bikers per day. Similarly, nearby Sweeney Creek Trail receives fewer than 0.5 users per day in August (data from Bridger-Teton National Forest). These low use numbers raise serious questions about whether demand justifies new trail construction in critical wildlife habitat, particularly when existing options remain largely underutilized and are situated outside of the most sensitive areas.

Habitat Loss Cannot Be Mitigated by Seasonal Closures

The STA has proposed seasonal closures as a mitigation measure, but closures alone will not address the fundamental problem. Seasonal fluctuations of animal use in these areas do not allow for establishing consistent dates for closures. A closure window that is appropriate in one warm, dry year will not be effective in another year that sees, for instance, heavy, late-season snowfall. In addition, we have concerns about the capacity for BLM, STA or others to enforce closures. Habitat loss due to trail construction also requires the direct removal of sagebrush and bitterbrush — native vegetation that is extraordinarily slow to recover and that wildlife depend on for forage and cover, further reducing the capacity for the area to support robust mule deer herds.

Coordination Concerns

We strongly urge BLM to coordinate formally with WGFD before the decision process begins. WGFD manages the Sublette Mule Deer Herd and has critical data and authority regarding the wildlife resources at stake. Their input is vital to understanding the impacts to wildlife that could occur with development of this trail system and hence WGFD should be granted formal Cooperating Agency status on this project.

The State of Wyoming itself, through Governor Gordon's Executive Order 2020-1, has elevated protections for mule deer and pronghorn migration corridors, directing state agencies, including WGFD, to exercise their legal and regulatory authorities to protect the annual movement of these species between seasonal ranges. The STA proposal that BLM is now considering encourages increased human use within this corridor. This runs directly counter to the state-level directive, and underscores why WGFD's expertise and concerns must carry substantial weight in this decision.

Conclusion

We respectfully request that the BLM PFO:

1. prepare an **Environmental Assessment with a public scoping period** and robust public involvement,
2. grant WGFD **formal Cooperating Agency status** in that assessment, and
3. **work with WGFD** to identify an alternative trail location, if a trail is deemed necessary, that will have little to no impact on wildlife.

The ecological value of the habitat in the proposed Skyline location is vital to the long-term health of mule deer, elk, moose, and pronghorn, some of our nation's most treasured wildlife populations.

Please don't hesitate to reach out with any questions.

Sincerely,

Renee Seidler

Renee Seidler
Executive Director

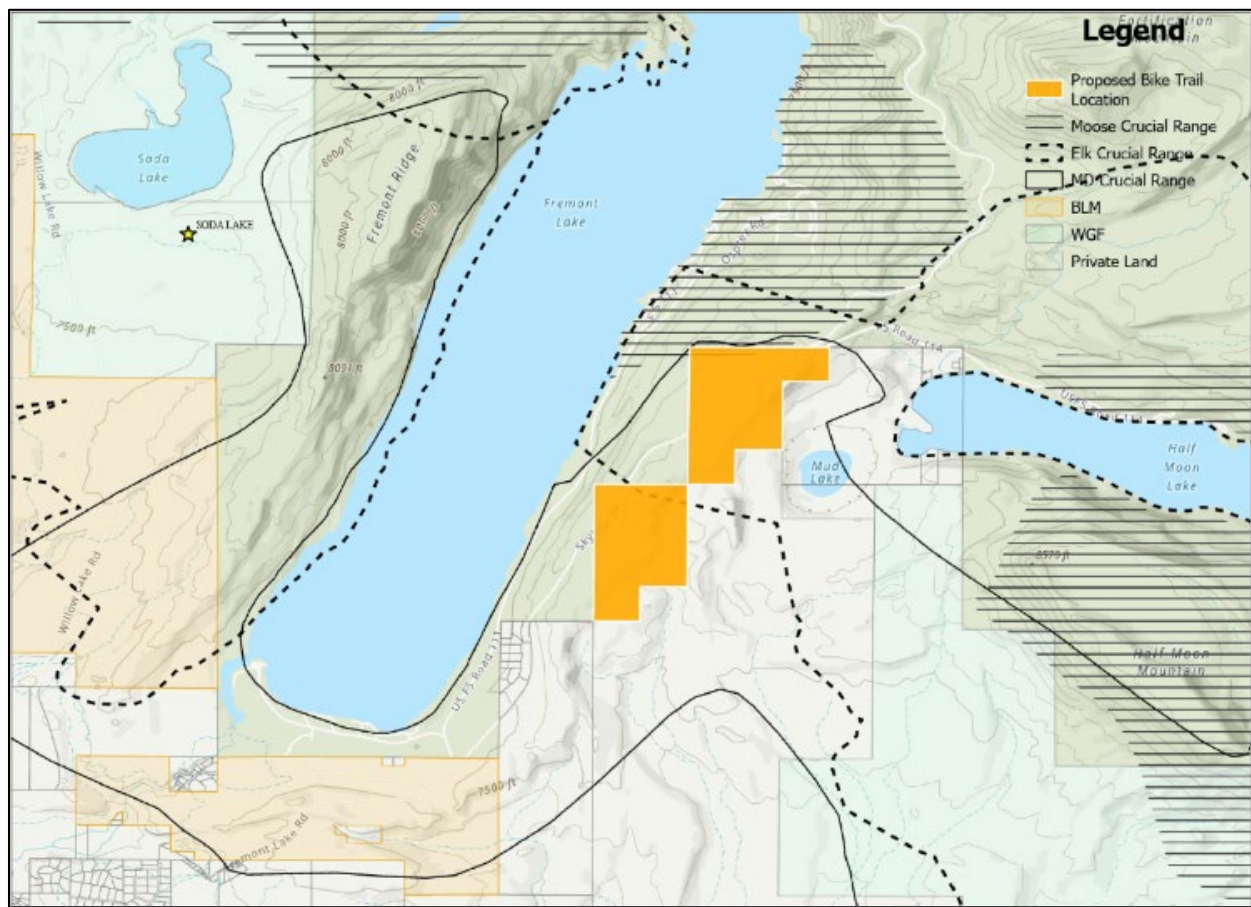


Figure 1. WGFD designated Crucial Range for moose, elk and mule deer overlaps the proposed project area. Courtesy WGFD.

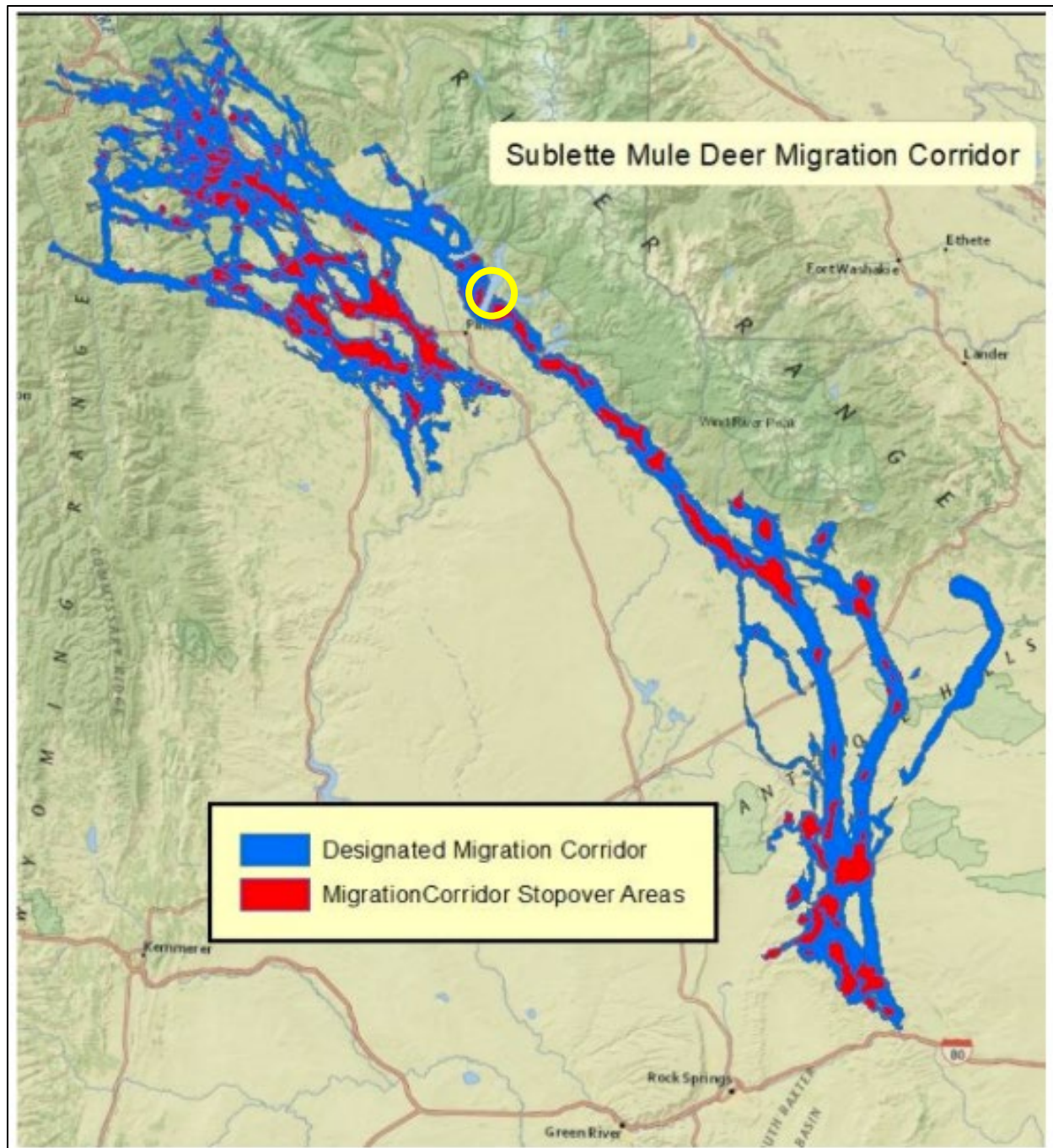


Figure 2. WGFD designated Sublette Mule Deer Migration Corridor and Stopover Habitat overlap the proposed project area (indicated by gold circle). Courtesy WGFD.

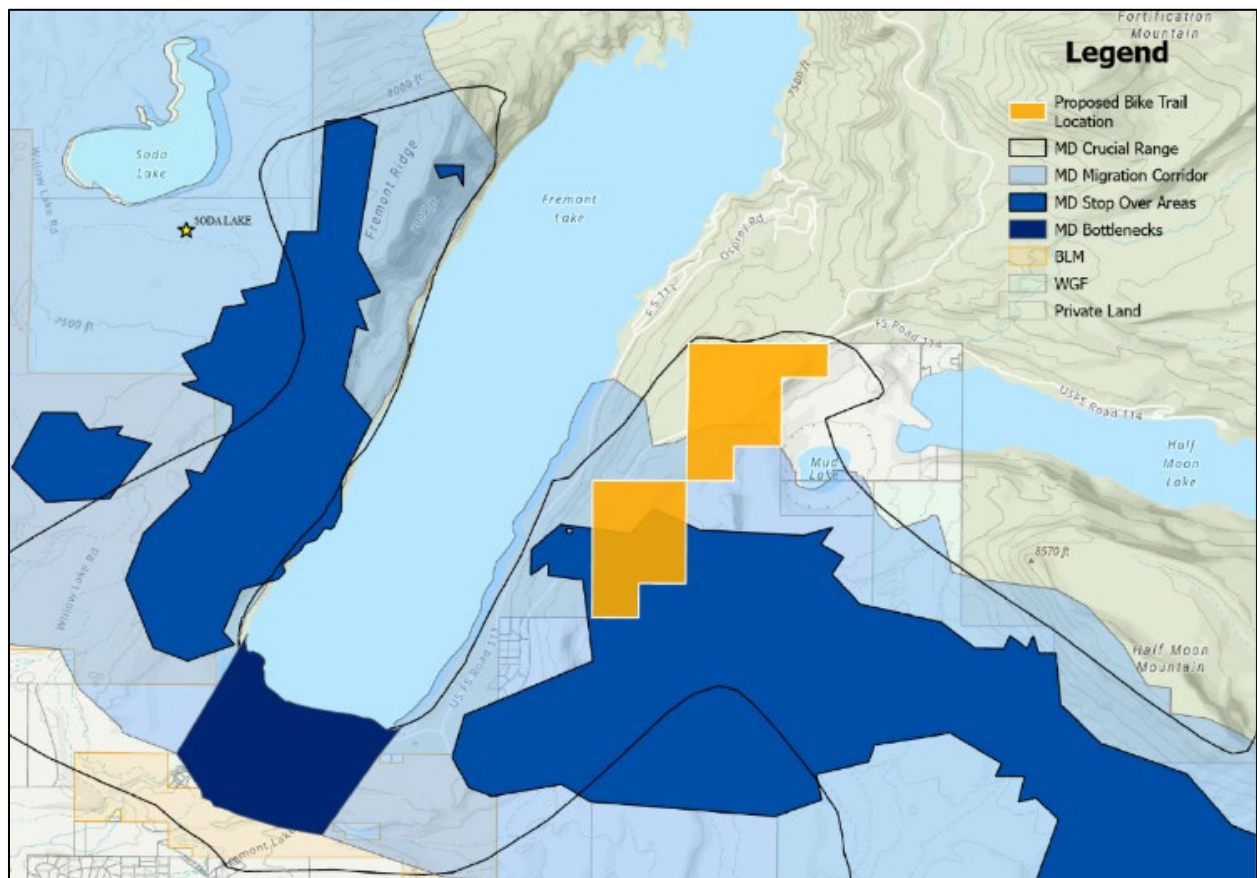


Figure 3. Close up of WGFD designated Sublette Mule Deer Migration Corridor and Stopover Habitat overlapping the proposed project area. Courtesy WGFD.

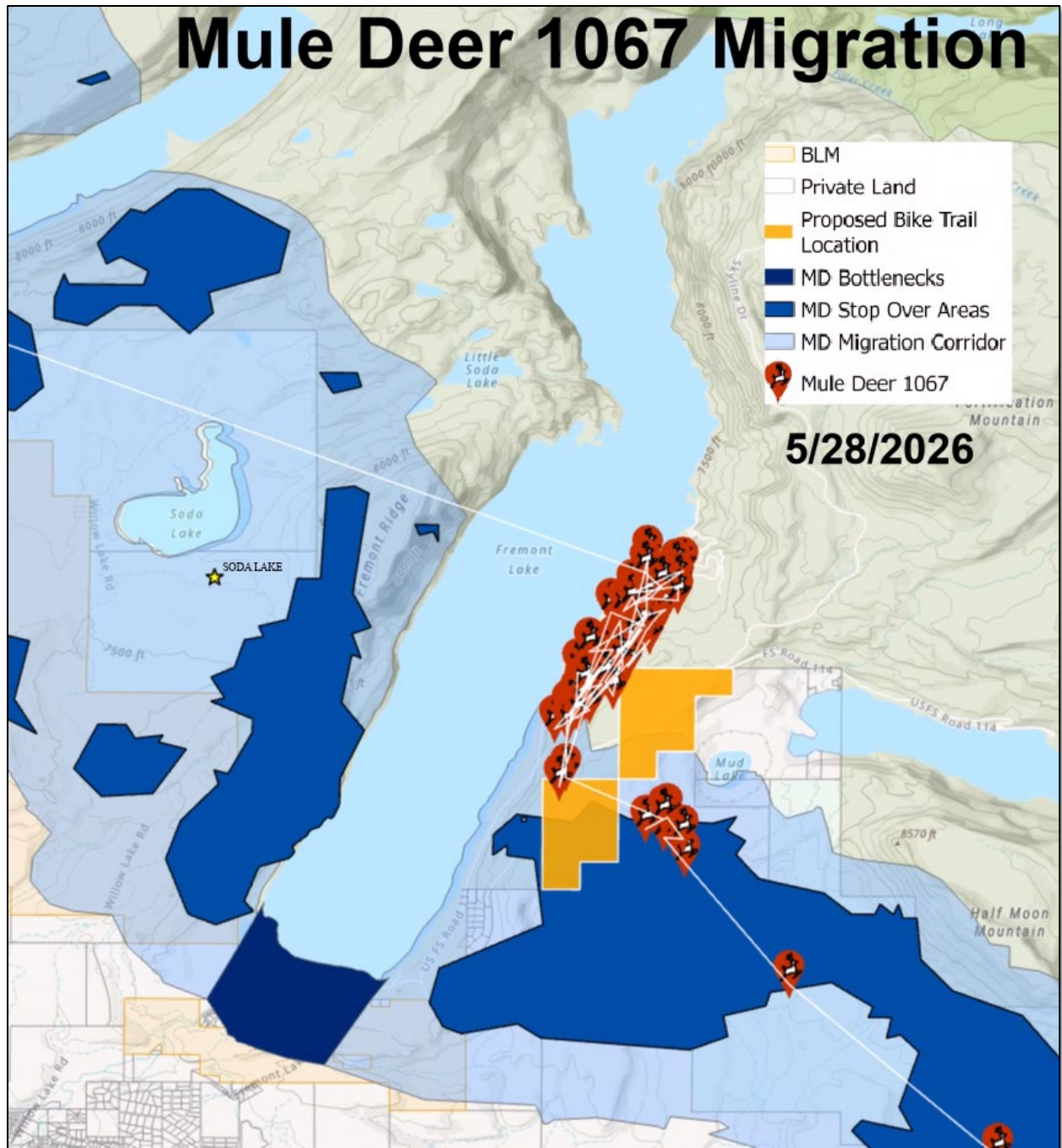


Figure 4. Two WGFD GPS-collared mule deer that are now summering in Grand Teton National Park spent the entire month of May 2026, on these two BLM parcels (the proposed project area) and in the surrounding area. Deer 1067 is shown here. Courtesy WGFD and University of Wyoming Cooperative Fish and Wildlife Research Unit, Kauffman Lab.