



Post Office Box 1210
Wilson, Wyoming 83014
info@tetonbackcountryalliance.org
www.tetonbackcountryalliance.org

Dear Supervisor Todd Stiles,

The Teton Backcountry Alliance strongly recommends that the Bridger Teton National Forest NOT open Teton Pass mountain bike trails and Old Pass Road to e-bikes, as proposed.

TBCA makes this recommendation for two types of reasons, one having to do with the process by which this proposal was developed and the other related to direct impacts:

PROCESS:

- The scoping document states that the proposed action was formulated through consultation with a pro-motorized stakeholder group, and without any inclusion of traditional trail users. TBCA suggests that the exclusion of traditional human-powered users makes the process inadequate, resulting in a proposal that is both biased and as a consequence, deficient in a broad range of perspectives. In this respect, the scoping process is flawed and the proposal should be fully rejected.

DIRECT IMPACTS

- Increased congestion: E-bikes will add to use at trailheads and the trails of Teton Pass, and therefore create greater congestion problems. The trailheads at Phillips Bench and Trail Creek are already at parking capacity, and at times exceed capacity. The scoping document suggests that allowing e-bikes will reduce car access to trailheads. There is no empirical evidence to suggest such a reduction. Instead, TBCA suggests that while some users may ride their e-bikes from Stilson or Wilson, the net result will be quite the opposite with most users parking at the trailheads, especially for mountain biking use as those bikes are not well suited to bike path riding. While the single-track trails of Teton Pass and Old Pass Road currently have moderate levels of use compared to areas such as Cache Creek, the addition of e-bikers will result in crowding on Teton Pass, and as a result, dramatically degrade the existing conditions.
- More Accidents: Downhill mountain biking on Teton Pass currently results in several accidents a week, with some requiring a Teton Country Search and Rescue response. E-bike rentals are now popular with tourists, many of whom have limited mountain biking skills and little knowledge of cycling etiquette. These visitors will be drawn to Teton Pass. Guided e-bike parties will be drawn to the area as well (and already are, illegally). Allowing e-bikes is likely to increase the number of accidents. In most cases, these accidents would likely involve non-motorized cyclists, pedestrians, and horseback riders. In addition, experience in other areas shows that e-bike batteries can result in wildfires that, in the case of Teton Pass, could be devastating to the forest ecosystem and our highly valued public land.
- Impact on Wildlife: E-bikes move faster during uphill travel than human-powered bikes. Some suggest that the current level of recreation is displacing wildlife from this habitat. An increase in

overall recreational congestion and greater speed of e-bikes will have an untold impact on the area's wildlife (grizzlies, elk, deer, wolverine, coyotes, and others), resulting in greater habitat displacement and a potential population effect.

- **No enforcement:** The proposal that e-bikes will be limited to Class 1 bikes suggests the need for significant enforcement, a topic not discussed in the Scoping Statement. By its own admission, BTNF is already understaffed (e.g., no capacity to manage paid parking on Teton Pass, as reported in the JHNG). It is extremely easy to retrofit a Class-1 e-bike to double its speed. (For example, see [here](#).) How then will it enforce use of only Class 1 e-bikes? Last year only two part-time "ambassadors" served on Teton Pass, who have no authority to cite violators of the no-e-bike rule. Those FS staff who can write citations are spread thin with responsibilities across a large region. The proposal that e-bikers will acquire certification stickers from bike shops implies that shop employees will be responsible for management of the certification process, an arrangement that would be ripe for abuse. TBCA suggests that allowing e-bikes as a solution to the current enforcement issue is irresponsible.
- **More use conflicts with greater impacts on traditional users:** E-bikes are substantially faster on uphill terrain. When on uphill single track trails, those using human-powered bikes will therefore be the ones having to defer to e-bikes. For example, human-powered mountain bikers on narrow single-track trails such as Arrow, Snotel, and Philips Ridge will have to stop, lose their uphill momentum, let e-bikers pass, and start again - an action not easily done when peddling single track uphill. In short, human powered cyclists are being asked to bear the burden so those using batteries to assist their recreation. In effect, this would allow one group to recreate at the expense of another. Other conflicts are also likely. At present, there are already many conflicts (and near-misses) between cyclists and pedestrians on Old Pass Road. Potential conflicts between e-bikes and horseback riders are especially noteworthy. The addition of e-bikes on Old Pass Road and the single track of Teton Pass will undoubtedly result in more user-group conflicts.

The Forest Service is legally obligated to minimize use conflict between whatever motorized uses and other recreational uses. Per amendment number 7700-2022-1 to Forest Service Manual 7700, Chapter 10, the Forest Service's discretion to designate trails for e-bike use falls under Subpart B of the Travel Management Rule and, like all aspects of travel management, is subject to the minimization criteria. These criteria require the Forest Service minimize impacts from the proposed motorized use (in this case, e-bikes) on wildlife and wildlife habitat and natural resources as well as conflicts between the proposed motorized use and other recreational uses.

These criteria are described in FSM 7700, chapter 7715.5, along with specific criteria for designation of trails for e-bike use. This FSM direction reads as follows:

*FSM 7715.2 paragraph 2. **Specific Criteria for Trails and Areas.** In addition to the general criteria in FSM 7715.5, paragraph 1, when designating motor vehicle use or OSV use on NFS trails and areas on NFS lands, consider and document the effects on the following, with the objective of minimizing:*

- a. Damage to soil, watershed, vegetation, and other Forest resources. Consider best management practices (BMPs) established by States as a standard for considering effects on these resources;*
- b. Harassment of wildlife and significant disruption of wildlife habitats;*

- c. Conflicts between motor vehicle use or OSV use and existing or proposed recreational uses on NFS lands or neighboring Federal lands; and
- d. Conflicts among different classes of motor vehicle uses or OSV uses on NFS lands or neighboring Federal lands.

In addition, consider and document:

- e. Compatibility of motor vehicle use or OSV use with existing conditions in populated areas, taking into account sound, emissions, and other factors, such as traffic-generated dust and the proximity of residences, parks, and schools.

*FSM 7715.2 paragraph 3. **Specific Criteria for Trails.** In addition to the general and specific criteria in FSM 7715.5, paragraphs 1 and 2, consider and document existing Trail Management Objectives (TMOs) before making designations of motor vehicle use under Subpart B or OSV use under Subpart C that would add vehicle classes on NFS trails.*

*FSM 7715.2 paragraph 4. **Specific Criteria and Guidance for Designating E-Bike Use on Trails.** In addition to the general and specific criteria in FSM 7715.5, paragraphs 1 through 3, when designating NFS trails for e-bike use (FSM 7705), consider and document the following:*

- a. Whether and the extent to which the trails are managed for bicycle use or bicycle use is allowed (FSM 7705) under the applicable TMOs.
- b. For trails that are managed for bicycle use or where bicycle use is allowed, the extent to which effects from e-bike use are comparable to effects from existing bicycle use, accounting for, as appropriate, differences in speed; potential effects from increased or concentrated use; and any site-specific considerations.

Consider designating a class or classes of e-bike use, as appropriate, on NFS trails managed for bicycle use or where bicycle use is allowed, where effects from e-bike use would be comparable to effects from bicycle use.

We do not believe that designating Teton Pass mountain bike trails and Old Pass Road for e-bike use would comply with the above criteria, for the reasons specified earlier in this letter.

While the question of using e-bikes is framed in the Scoping Statement as a non-snow issue, TBCA believes that allowing this travel will open the door for emerging e-technologies, such as e-snowboards and e-snow bikes, to be used in the winter months, a time when wildlife is at energy lows and when there is even less USFS enforcement capacity.

TBCA has great concerns about the increasing mechanization/motorization of backcountry recreation and travel. Hence, TBCA believes that USFS has a responsibility to maintain human-powered opportunities on Teton Pass as they currently are, **without** intrusion from motorized uses. For more than a century, Teton Pass has been valued as a quick escape from motors and an opportunity to interact with the natural environment. BTNF has generally worked to separate non-motorized and motorized trails. This is much appreciated by the human-powered recreation community. Allowing e-bikes at Teton Pass would be a MAJOR change in policy direction. We remind BTNF that a portion of the area proposed for downhill e-bike use (e.g., Lithium Trail) is within the Wilderness Study Area, which should be managed as wilderness. For these reasons TBCA suggests that on Teton Pass the USFS promote human-powered use rather than encouraging the mechanization of backcountry travel.

As well, the Scoping Statement proposes that Teton Pass would be the primary location in Teton County for e-bike recreation, and as result, Teton Pass would be the epicenter for such change. While e-bikes may be appropriate in some places and for some people, the proposal to open Old Pass Road and most of the Teton Pass mountain bike trail system to e-bikes will SIGNIFICANTLY change the area and subtract from ecosystem health and human-powered users' opportunities for recreation.

The Teton Pass Corridor Planning Draft documents in detail options for modifying infrastructure of Highway 22 and FS trailheads and user access. The Corridor Planning process has pointed up the need for a broader, more holistic focus on the future of Teton Pass as a byway AND as a recreation area. For these reasons, we recommend that the USFS reject the current proposal, and instead include the question of using e-bikes as part of a broader Teton Pass planning process. TBCA also recommends that the question of e-bikes on Teton Pass (and elsewhere) be considered as part of BTNF travel planning in the Forest Plan Revision.

TBCA's Board of Directors makes its recommendation based on discussions with many members of our community and our collective experience as hikers, guides, horse packers, skiers, board riders, and mountain bikers of Teton Pass.

Thank you for the opportunity to comment on this important matter, and for considering our concerns.

With respect,

The Teton Backcountry Alliance Board of Directors - Gary Kofinas (Chair), Kim Havell, Tom Turiano, Jen Reddy, Jed Porter, Jay Pistono, Nancy Bockino, Mike Parris