

Monday, October 30th, 2023
To: Todd Stiles, District Ranger
Attn: E-bike Use Designation on Select Jackson Area Trails



I write today as the Conservation Director of the Jackson Hole Conservation Alliance, and we wish to make comments regarding the Bridger Teton's proposal to allow class 1 e-bikes on select Jackson area trails.

First off, I want to thank Tim Farris for reaching out and meeting with me prior to the release of this proposal. We appreciate being given the heads-up about this proposal and Tim taking the time to fill us in about the thinking behind this proposal.

With that said, we have some concerns about this proposed change. Overall, we see the merit of limited expanded access to e-bikes on select trails, with the appropriate side rails, monitoring, and enforcement. We also believe that we can use this as a test case to examine first-hand the impacts of class 1 e-bikes in an adaptive management context, as many of the impacts of this change are unknown.

This proposal makes us nervous due to the "slippery slope" argument that this allowance may open the flood gates for e-bike use more broadly on the Forest or for class 2 and 3 e-bikes to be allowed shortly around the corner. We want to make it clear that our support is for this proposal only and nothing more. We implore the Forest Service to make clear the boundaries of these allowances and to spend sufficient resources educating users and enforcing regulations. We also want to reiterate our position that mechanical recreation should never be allowed in wilderness areas (e-bikes or conventional bikes).

The alliance wants to make the following concerns about this proposal clear:

- This proposal should be a test case to study the impacts of e-bikes on select trails – this allowance should be temporary and used for adaptive management purposes. This change should only be made permanent if it is found to not have adverse effects on the resource or user experience.
- Unmitigated access / lack of enforcement often leads to resource and/or experience degradation – proper monitoring and enforcement will need to be present to let users know that the rules will be enforced.
- Biker safety – will the addition of e-bikers make the trails more dangerous? Preliminary research shows e-bikes do not move faster than conventional bikes downhill. We need to monitor and find out the trends here locally to determine if e-bikes might make the trails more dangerous for users.

- Risk to trail surface or vegetation – we need to understand if e-bikes may present different impacts to the trail or vegetation in an adaptive management context.
- Fire danger from e-bike batteries – what is the risk that a crash or malfunction could start a wildfire?
- Chemical pollution from leaking or damaged batteries – this risk needs to be examined.
- Trails become one way due to e-bike uphill speeds – some critiques of the plan suggest that the trails will become one way. It is important to the JH Conservation Alliance that the user experience is not degraded at all due to e-bikes being allowed. It would be a failure if this proposal causes the trails to become one way only, greatly impacting the user experience.
- Wildlife impacts – e-bike users could bring more traffic, higher speeds, and increased risk to these trails. Some of these impacts could affect wildlife. If wildlife were adversely impacted by this change, the Alliance would expect the Forest to revoke these e-bike privileges on these trails.

If allowing class 1 e-bikes on these trails results in resource degradation, wildlife impacts, or a hampering of the user experience, we expect that the BTNF would revoke these new e-bike privileges. Thank you.

Sincerely,



Kevin Krasnow, Ph.D.
Conservation Director
The Jackson Hole Conservation Alliance