



February 20th, 2025

Jackson Ranger District
340 N. Cache Drive
Jackson, WY 83001

Subject: E-Bike Use Designation on Select Jackson Area Trails

Dear Jackson Ranger District Staff,

Mountain Bike the Tetons (MBT) is a 501c3 non profit and International Mountain Bike Alliance Group, representing both Teton County, Idaho and Wyoming, with a focus in trail stewardship, advocacy, community education and engagement in the Teton Region. MBT advocates for sustainable, responsible recreation and supports a balanced decision between 'Alternative 1' and the original 'Proposed Action' for this project.

MBT recommends and supports the designation and management of Class 1 e-bikes ONLY on all purpose-built, bike-optimized singletrack trails.

The organization asserts that Class 2 and 3 e-bikes are not well-suited for the trails on Teton Pass or the trails proposed at Shadow Mountain. The throttles on Class 2 e-bikes and the power output of Class 3 e-bikes create an experience that deviates from mountain biking, potentially compromising the integrity of the trail networks proposed. The allowed top speed from a class 1 mountain bike is in line with the performance of human ability - this is not the case for class 2 or 3. It is important to consider the intention of these trails and the capabilities of the bikes that will be using them. Furthermore, MBT recognizes that the inclusion of all classes of e-bikes could create challenges in management, unintentionally inviting unclassified electric vehicles onto these trails. MBT is committed to setting clear guidelines that prioritize the safety and enjoyment of riders while ensuring the integrity and intention of the trails. It is also important to note that no leading mountain bike manufacturers are currently producing full suspension Class 2 or 3 mountain bikes, further supporting the recommendation that Class 1 e-bikes are the most appropriate choice for the trails considered in this proposal.

Teton Pass Area

-MBT is in support of:

- allowing Class 1 eMTBs on Old Pass Road but would suggest reevaluation on this route access when there is a connection to Victor, Idaho.
- allowing Class 1 eMTBs on the designated downhill mountain bike trails, outside of the Palisades Wilderness Study Area, including: Jimmy's Mom, Powerline Jumps, Fuzzy Bunny, Phillips Connector Trail and Parallel Trail. (See class 2 & 3 comments above)



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- allowing Class 1 eMTBs on the north side of Teton Pass (Arrow, Philip's Ridge, and Philip's Canyon) as the original proposal stated, *if* there is strong public support for the initiative. Community feedback is paramount to determining how best to manage trail access and consider the needs of all trail users. ***However, if there is significant opposition to class 1 eMTBs on the north side trails in this process, MBT is firm in its commitment to protecting access for regular, non electric mountain bike users, prioritizing the preservation of this access if any risks to it arise.***

Shadow Mountain Area

-MBT is in support of:

- accepting the existing non-system mountain bike trail (2.26 miles) as part of the official NFS trail system, completing trail reconstruction to enhance sustainability and rideability, and adding signage to encourage one-way downhill use.
- constructing 1.94 miles of new trail on the ridge to the south, partially utilizing the existing closed road at the bottom and adding signage to encourage one-way downhill use.
- constructing 1.3 miles of new trail for an uphill climbing route, adopting the existing closed road at the bottom and adding signage to encourage one-way uphill use.
- adding 0.52 miles of new trail as a top connector trail.
- Shadow mountain trails being managed as multiple-use (hiker, mountain bikes, e-bikes, and equestrian)
- Class 1 eMTB access ONLY on these trails (shadow mtn) with motorcycle use on these trails not being permitted.

MBT is enthusiastic about the development of new trails in the Shadow Mountain Area and is committed to contributing to the planning, design, and building processes. While supportive of new trail development, we agree with the EMTB Coalition that the proposed amount of trail is not enough to meet the purpose and need outlined in the original proposal. More miles for various users are suggested.

-MBT is not in support of:

- all three classes of e-bikes being managed on proposed shadow mountain trails.
- removing the Middle Fork of Ditch Creek Trail (6.34 miles) from the official NFS trail system because MBT believes that it plays an important role in the region's trail culture and offers a connection to other trails in the area.

Mosquito Creek Area

MBT is in support of:

- constructing 2.85 miles of new trail in the area to the west of Mill Creek that connects the Crankshaft Trail to the existing trailhead incorporating e-bike and motorcycle design elements.
- re-routing two sections of the Crankshaft Trail to address erosion and sustainability issues and to improve rideability for e-bike and motorcycle use.
- Mosquito trails being managed as multiple-use with all three classes of e-bikes allowed.



Munger Mountain Area

-MBT is in support of:

- extending the open season for e-bike use on the lower trail system of Munger. In alignment with the EMTB Coalition, a June 15th – October 31 season for eMTBs in these areas would be an ideal balance to mitigate wildlife conflict while allowing a longer riding season than alternative 1.
- Munger trails being managed as multiple-use with all three classes of e-bikes allowed.

Thank you for your time and efforts to improve mountain bike access in the Bridger-Teton National Forest and considering our comment during this public process.

Sincerely,

Chris Brule
Executive Director
Mountain Bike the Tetons