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February 20, 2025

Tim Farris
Bridger-Teton National Forest, Jackson Ranger District
Attn: E-Bike Use Designation on Select Jackson Area Trails Project
340 N Cache St
Jackson, WY 83001

Dear Tim Farris,

Thank you for the opportunity to comment on the Electric Bicycle (E-Bike) Use Designation on Select Jackson Area Trails draft EA project within the Jackson Ranger District of the Bridger-Teton National Forest.

On behalf of the PeopleForBikes Coalition, we applaud the Jackson Ranger District's efforts to designate existing trails for use by e-bikes, thereby creating accessible recreation opportunities and managing the forest to adapt to changing technologies and recreation patterns. We support both the Proposed Action, which would designate e-bike use on select Jackson Area Trails projects, as it proposes to allow Class 1 e-bike use on 27.5 miles of existing trail in the Teton Pass area and extend the season for e-bike use on Horsetail Creek Trail and trails in the Munger Mountain area. Please see our comments below on why we support the designation of Class 1 electric bicycles on existing non-motorized natural surface trails where traditional mountain bikes are already allowed. However, we would also support components of Alternative 1 in addition to the Proposed Action. Specifically the construction of new trails designated for e-bike use and the authorization of Class 1 only on natural surface singletrack trails where mountain bikes are already allowed.

The PeopleForBikes Coalition is the national advocacy group and industry association that works for better policies and infrastructure for bike riding. We strive to make bike riding a safer and more inclusive activity for everyone, including those who ride mountain bikes and electric mountain bikes on natural surface, bicycle-optimized singletrack trails.

PeopleForBikes supports the Jackson Ranger District's project vision of designating existing recreation trails and constructing new trails for bikers and e-bikes. Demand for natural surface single-track trails is urgently needed to support current levels of recreation on public lands. Federal land management agencies are critical to recreation infrastructure, as many of the best mountain biking and bicycling trails in the U.S. are on federal public lands. We encourage the allowance of mountain bikes and pedal-assist Class 1 electric bicycles on new and existing trails within the Jackson Ranger District.

Research from the East Zone Connectivity and Restoration Project in Tahoe National Forest indicates that pedal-assist Class 1 electric bicycles can be successfully incorporated into

trails with non-motorized uses, which supports this stance.[1] Included in the East Zone Connectivity's final decision notice was the designation of 35 miles of existing non-motorized trails as open for Class 1 electric bicycles. With the introduction of Class 1 electric bicycles on natural surface trails where mountain bikes are already allowed in the East Zone, staff found that they do not significantly alter public enjoyment or affect the patterns of use on those trails. Findings from the East Zone Connectivity Project Environmental Assessment noted that in most places, traditional mountain bikes and Class 1 electric bicycles have similar effects on the physical trails and public use patterns.[2] Additionally, the Tahoe National Forest also completed an Environmental Assessment for the Pines to Mines Project, which opened access to 68 miles of singletrack trails for Class 1 e-bikes on non-motorized singletrack trails. As noted in the Environment Assessment for the Pines to Mines Trail Project, the impacts to trail tread and speed differentials were not shown to be affected by Class 1 electric bicycles compared to analog mountain bikes:

> "Effects on trails are not considered to be significantly different between traditional mountain bikes and Class 1-E-Bikes. Their equipment components are similar including wheel size, tire tread, gearing, chain, brakes, and gear shifting mechanisms. Impacts to trails in terms of tread wear, soil movement, erosion, and contribution to sediment delivery have also been shown to be similar (Wilson and Seney 1994; Weaver and Dale 1978; IMBA 2015). Finally, a review of literature, consideration of current user trends, and USFS observations of use characteristics during the 2019 season when Class 1 E-Bikes were allowed on all non-motorized trails on the forest, determined there are no significant differences between the two vehicle classes with respect to relative speeds (Langford et al. 2015; TNF Unpublished 2020) and user behavior (Langford et al. 2015)."[3]

Pedal-assist Class 1 electric bicycles are an emerging technology that makes the activity of mountain biking more accessible and enjoyable to users with different levels of experience, skill, and physical ability. Class 1 electric bicycles look, are equipped, and ride like traditional bicycles and simply give riders – regardless of age, physical, or cognitive ability – an extra assist while pedaling. When introduced on- or off-road, studies have shown that there appear to be minimal conflicts between e-bike riders and other user groups, with no material safety distinctions between e-bikes and conventional bicycle use.[4]

The addition of e-bikes allowed on select Jackson area trails can profoundly benefit the community. E-bikes relieve congestion and traffic by giving users more options to ride to the trailhead instead of driving or shuttling. This has a positive impact on parking and traffic congestion and cuts down on emissions at popular trail destinations. Pedal-assist Class 1 e-bikes also allow people of all abilities to access these routes and keep older riders biking, staying active, and feeling connected to their public lands.

The federal government has regulated electric bicycles since 2002, when legislation was passed defining low-speed electric bicycles. Under this federal law, electric bicycles are

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[1] USDA Forest Service. "Tahoe National Forest East Zone Connectivity and Restoration Project Draft Decision Notice." (2021).

[2] USDA Forest Service. "Tahoe National Forest East Zone Connectivity and Restoration Project Draft Decision Notice." (2021).

[3] USDA Forest Service. "Preliminary Environmental Assessment: Pines to Mines Trail Project." (2023).

[4] Jefferson County, Colorado Electric Bicycle Study (2017)

consumer products regulated by the United States Consumer Product Safety Commission. They must comply with the federal safety standards for bicycles in 16 CFR Part 1512. Given the federal definition, electric mountain bikes are bicycles, and users seek the same experience on singletrack trails. Therefore, motorized routes created for OHVs and motorcycles are not sufficient for this user group and the experiences they seek.

Examples of communities and entities that have undertaken significant studies of electric bicycle impacts, rider behavior, perceptions, etc., from other user groups are attached to this letter. We believe an objective examination of the facts leads to the conclusion that Class 1 pedal-assist electric bicycles should be treated like conventional bicycles on natural surface trails throughout the Jackson Ranger District.

However, we also believe that elements of Alternative 1 would benefit the community and should be adopted along with the Proposed Action. Specifically, we support constructing 7.26 miles of new trails, as well as adopting 2.86 miles of existing non-trail system trails, as well as allowing summer use of Class 1 e-bikes on 27.5 miles of existing non-motorized trails in the Teton Pass area, and extending the season when e-bikes would be allowed on Horsetail Creek Trail and trails in the Munger Mountain area. These proposed additional miles of trail make use of existing user-created trails and add mileage to the existing trail networks that are popular and used frequently. Shadow Mountain has existing trails, ridges, and valleys with old camping spurs that can be connected to the campsites there to provide a world-class trail system for locals and visitors. Mosquito Creek has a small but great system where added miles will only add to the experience. Swinging Bridge and Johnny Counts Road will add to the South Jackson trail system, giving users trail options to Astoria Hot Springs. This will not only give Class 1 electric mountain bikers good places to ride but also add mileage to the community network and help to spread all users out over the front-country trail system.

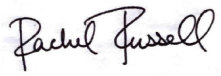
Old Pass Road ties into the paved pathway network, and it makes sense to also allow Class 1 e-bike use. However, on the downhill, bicycle-optimized natural surface singletrack trails in this area, we continue to advocate for Class 1 only to harmonize the regulations and rules of the trails. Class 1 access would continue to allow the opportunity to ride these trails without having to shuttle up the highway and may help alleviate parking concerns at these trailheads in the summer.

Finally, we support education for all recreational users and provide an educational opportunity to promote responsible and respectful ethics on trails and the road. E-Bike Smart, a new electric bicycle rider safety education program created by PeopleForBikes, the League of American Bicyclists, and Bicycle Colorado, was launched to the public on August 30, 2023. The program is designed to help riders of all ages and experience levels learn best practices for safely and responsibly riding an e-bike, and the program has already garnered widespread support from the bike industry and advocacy groups across the country. As part of the E-Bike Smart Program, the safety guidance takes participants through a series of short videos that explain what an electric bicycle is, how to handle their e-bike battery, where users can ride e-bikes, and best practices for rider safety and etiquette when on their e-bike. After each video, participants can take a brief quiz to test their knowledge. We would be excited to work with the Bridger-Teton National Forest, Friends of the Pathways,

local bike shops, and other advocacy and community organizations to help educate users and riders on e-bike safety.

Thank you for considering our comments. I would welcome the opportunity to provide further information on the studies I've included, the E-Bike Smart program, and the designation of singletrack trails for use by pedal-assist Class 1 electric bicycles on Jackson Ranger District trails and public lands.

Sincerely,



Rachel Fussell
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Additional Information on Electric Bicycle Speed, Safety, and Studies

USDA Forest Service NEPA Environmental Assessments indicate Class 1 electric bicycles can be successfully incorporated into trails with non-motorized uses.

A. The observations and data collected by TNF staff, relative to Class 1 electric mountain bikes' impact on trails, are consistent with the findings from other studies in this topic area. These studies were conducted by varying institutions, universities, and industry groups that performed research on trail impacts from recreational uses. Data from the scientific literature is consistent on several key points:
    a. Greater sediment yields are produced by equestrians and pedestrians when compared to wheeled modes of transportation. (East Zone Connectivity and Restoration Project Decision Notice & FONSI 2021)
    b. Horse traffic produces the greatest force (weight per unit area) among hikers, equestrians, mountain bikers, and motorcyclists. (East Zone Connectivity and Restoration Project Decision Notice & FONSI 2021)
    c. Horses cause greater increases in soil compaction, litter, trail width, and trail depth compared to hikers and motorcycles. (East Zone Connectivity and Restoration Project Decision Notice & FONSI 2021)
B. TNF's observations related to trail impacts are also consistent with a study conducted by the International Mountain Bicycling Association (IMBA), which found similar effects between Class 1 electric mountain bikes and their conventional counterparts (East Zone Connectivity and Restoration Project Decision Notice & FONSI 2021).
C. Based on a review of their findings, "Tahoe National Forest has determined that inclusion of Class 1 E-bikes as a designated, legitimate use on these trails does not constitute an increased adverse impact to their sustainability" (East Zone Connectivity and Restoration Project Decision Notice & FONSI 2021).

Electric bicycles travel at similar speeds to traditional bicycles.

A. Class 1 electric bicycles have a motor that cuts off after the rider reaches 20mph. This is not the average speed. On flat and uphill surfaces, electric bicycles travel on average 2-3 mph faster than conventional bicycles (i.e., around 13-14 mph). However, studies show that the sex of the rider is a better predictor of speed than whether they are using a conventional or electric bicycle. Studies also show that electric bicycles do not travel significantly faster than regular bicycles and, in some instances, are slower, depending on the location and the rider.
    - US Department of Transportation Federal Highway Administration. "E-Bikes in Public Lands: A Human Factors Field Study." (August 2023).
        - In locations identified as a higher risk for potential conflicts along an unpaved, multiuse trail, analysis shows that e-bike riders travel slightly faster on average than conventional bike riders. However, the **sex of the rider predicts a greater increase in speed** (males average 2.51 mph increase) **than whether they are using a conventional or electric bicycle.** Distributions of e-bike and conventional bike rider speeds overwhelmingly overlap with one another: both exhibit similar extremes at the high and low ends of the speed spectrum.
    - Tahoe National Forest NEPA Environmental Assessment. "East Zone Connectivity and Restoration Project Decision Notice & FONSI" (2021).
        - During the EA process, TNF concluded that differences in speeds on singletrack natural surface trails are largely dictated by the rider's ability as well as trail conditions, alignment, and design. Additionally, it was noted that Class 1 electric bicycles and conventional mountain bikes have almost indistinguishable frames and components, making their stopping ability similar and trail etiquette guidelines the same for both types of users.
    - Cherry, C. & MacArthur, J., E-bike safety, A review of Empirical European and North American Studies (Oct. 15, 2019)
        - "[Electric bicycle] riders tend to ride at higher speeds on uphill segments, but not flat or downhill segments.").
    - Langford, B. et al., "Risky riding: Naturalistic methods comparing safety behavior from conventional bicycle riders and electric bike riders, Accident Analysis & Prevention." (Sept. 2015)
        - "We find that average on-road speeds of e-bike riders (13.3 kph) were higher than regular bicyclists (10.4 kph), but shared use path (greenway) speeds of e-bike riders (11.0 kph) were lower than regular bicyclists (12.6 kph)".

<u>Electric bicycle riders comply with laws in the same way as riders of conventional bikes</u>.

A. Electric bicycle users are like most people and choose to respect the law of the road and be kind to others with whom they share public resources. They would respond more favorably to restrictions on use rather than an outright ban. Most critically, existing studies show that electric bicycle riders comply with laws to the same extent as bicycle riders.
    - Cherry, C. & MacArthur, J., E-bike safety, A review of Empirical European and North American Studies (Oct. 15, 2019)

        - "For other safety surrogates (wrong way riding, stop sign and signal compliance), e-bike riders behaved in the same way as cyclists, with similar violation rates."
    - Langford, B. et al., Risky riding: Naturalistic methods comparing safety behavior from conventional bicycle riders and electric bike riders, Accident Analysis & Prevention (Sept. 2015)
        - "E-bike riders exhibit nearly identical safety behavior as regular bike riders and should be regulated in similar ways.".

<u>The safety outcomes relating to electric bicycle use and conventional bicycle use are similar.</u>

A. Banning electric bicycles from areas where traditional bicycles are used is not justified based on safety issues or the risk of collisions.
    - US Department of Transportation Federal Highway Administration. "E-Bikes in Public Lands: A Human Factors Field Study." (August 2023).
        - Conventional and e-bike rider behavior is similar at locations with a higher risk of conflict. Both e-bike and conventional bike riders reduce speeds and exhibit similar precautionary behaviors: at vehicle conflict points, in narrow sections of the trail, and when passing other trail users.
    - Cherry, C. & Fishman, E., E-bikes in the Mainstream: Reviewing a Decade of Research, Transport Review (July 2015)
        - "Overall differences in safety outcomes were not dramatic between e-bike and bicycle riders.").
    - Cherry, C. & MacArthur, J., E-bike safety, A review of Empirical European and North American Studies (Oct. 15, 2019)
        - Summarizing European studies finding that over the same distances traveled, "e-bikes and conventional bicycles have the same crash risk.".

<u>An electric bicycle ban will not decrease ridership, only complicate enforcement. There is strong demand in the public for electric bicycles.</u>

A. Ridership is increasing, and people are using electric bicycles to recreate, replace vehicle trips, and augment existing bicycle trips. In 2020, electric bicycle sales grew by 132% (Source: the NPD Group). This is the fast-growing sector of sales in the bicycle industry by a significant margin.
B. Industry analysts estimate that more than 13.5 million electric bicycles will be sold in the United States between 2020 and 2030 (S&P Global Bicycle Industry Risk & Opportunity Forecast produced for PeopleForBikes)