

To Jackson Ranger District Staff:

I am in support of a combination of the Original Proposal and Alternative 1 and increasing access for e-bikes through responsible, safe, clear, and comprehensive implementation. I have 15 years of experience professionally facilitating adventures by bicycle for locals and visitors alike in the Tetons, and am passionate about off-road cycling. My position is informed by thousands of data points through my execution of a high volume of bicycle and e-bike rentals, repairs, sales, guiding, trail recommendations, & personal riding. I have outlined my recommendations by use area:

**Teton Pass Area Considerations:**

***Trail Inclusion/Exclusion on Teton Pass:*** I recommend adopting the trail guidelines in the Original Proposal that designate which trails should become legal for e-bike use: all trails North of the WSA with no exclusions of trails already open to bicycles.

- The offroad singletrack trails South of Highway 22 but North of the WSA including Fuzzy Bunny, Jimmy's Mom, Candyland, Parallel, Powerline Jumps, and Crater Trail will serve only a small fraction of e-bike riders in their riding & public land use goals, as these trails are advanced, are full of enhanced features, and require extensive experience and risktaking.
- Excluding Phillips Canyon, Phillips Ridge, Arrow & Snotel trails from legal e-bike use (but including trails between Hwy 22 & the WSA) will exclude many aspiring e-bike riders, cause safety issues on the trails between Highway 22 and the WSA, and also create more illegal e-bike use on trails in the WSA as well as illegal e-bike use on trails North of Highway 22.

***E-bike Class Inclusion/Exclusion on Teton Pass:*** I strongly recommend adopting the recommendations of the Original Proposal on which classes of e-bikes are allowed on Teton Pass, and to allow only Class 1 e-bikes on these trails out of concerns for the safety of all users on Teton Pass trails.

- The classification for classes of e-bikes is inherently confusing, and is generally disregarded by users.
- Alternative 1 as currently proposed allows Class 2 throttle e-bikes, which tend to be larger, heavier, and of lower component quality. Including throttles and all classes could also easily (and intentionally or unintentionally) be misconstrued by users as to include all electrically powered 2 wheeled vehicles including high output electric throttle 2 wheeled vehicles (unclassified, and requiring comprehensive collision and liability insurance).
- Majority of Class 2 e-bikes are purchased through online retailers vs. independent local bike dealers. This provides limited opportunity for local stewards to provide education on e-bike usage.
- The peer reviewed research on trail erosion is limited for all e-bikes, and especially Class 2 and unclassified throttle e-bikes. Further study is needed before making a data-informed decision on trail access for these products on currently non-motorized trails.

***Adaptive E-bike Use on Teton Pass:*** I **STRONGLY** support all adaptive cyclists right to use whatever equipment suits their goals in enjoying all Teton Pass trails, including 2, 3, & 4 wheeled bicycles & e-bikes with both electric pedal assist motors & throttles, and recommend an adaptive use statement reinforcing ADA regulations to this effect in the management plan.

***Safety on Teton Pass:*** I support Class 1 pedal assist e-bike use on Teton Pass with increased safety & education measures in place, including some from the Original Proposal 1 & Alternative 1, plus some additional measures:

- Additional signage is critical: A change in trail designation may create a significant increase in usership. New users (visiting and local) may or may not have knowledge of the Teton Pass and greater Teton area trail systems.
- Signage at the bottom and top of Old Pass road plus any other access point detailing that only Class 1 e-bikes are allowed (plus the adaptive use statement), what a Class 1 e-bike is, and statistics of Old Pass Rd including elevation gain/loss, grade, distance, surface, & user groups present.
- Ambassadors scheduled on Teton Pass & Old Pass Road.
- Brake check station at the bottom and top of Old Pass road plus any other access point.

- Speed limit in place on Old Pass Road with digital speed gauge sign facing descenders in strategic locations.
- Frequent signage that encourages e-bike riders to stay to the right when climbing/descending.
- Additional & increased signage at the entrances, exits, and access points of all directional, non-directional, user specific, and multi-use offroad singletrack trails both open and closed to bicycle/e-bike that clearly denote which user groups are allowed, direction of travel, that e-bikes are Class 1 only, what a Class 1 e-bike is, and why it would be unsafe for all users to enter a trail on the wrong equipment or in the wrong direction (including adaptive use statement). This signage should be present to the extent where you could not enter a trail at any entry, exit, or access point without reading it.

#### **Shadow Mountain Area Considerations:**

**I strongly support further development of Shadow Mountain for Class 1 e-bike only and bicycle use as outlined in Alternative 1, as well as providing for additional future development, including an adaptive use statement and adding signage & ambassadors.**

- Limiting e-bike access to Teton Pass and Munger (seasonally) as recommended in the Original Proposal does not sufficiently support the scale and scope of public e-bike use.
- However, Alternative 1 including all Classes of e-bike on Shadow Mountain will raise similar issues to Teton Pass.
- Wheel Wranglers management, customers & staff and I have particular enthusiasm for directional Class 1 e-bike and bicycle traffic on Shadow Mountain with climbing and descending specific trails, all with a world class view and proximity to Grand Teton National Park visitor amenities and the town of Jackson & surrounding communities.

#### **Summary**

- Responsible recreation has always been important in the Tetons. Going forward in this era of Federal land management, it will be urgently more so.
- Using clear language on what types of e-bikes are allowed and where in the management plan will be of utmost importance in supporting stewardship & reinforcement by stakeholders and community.
- Allowing only Class 1 Pedal Assist E-bikes without throttle & providing assist up to 20mph only and reinforcing this definition at every opportunity gives community members and businesses firm ground to stand on when interacting with other users and offering services, and will prevent many unforeseen negative consequences of the management plan. Official enforcement of a designation is important, but when hard to achieve, it is the layers of business and community stewardship and reinforcement that will provide support.
- Clear language and definitions will regulate both longstanding and yet-to-exist local and out of state businesses in designing and offering services that are compatible with Teton trail systems and management goals.
- We strongly recommend **against** the designation of Class 2 & Class 3 for access on Teton Pass or Shadow Mountain, and instead suggest looking at Mosquito Creek, Horsetail, & Swinging Bridge for that access.
- In solidarity with the goals of limiting illegal e-bike use, and allowing for the current and future need, I also recommend providing for future assessment of Class 1 e-bike use only designation in Cache Creek & Snow King in the management plan, with similar safety and education provisions as above.

Thank you for your hard work and thoughtful consideration.

Sincerely,

Bill McNamara