



Date: 2/10/25

Bridger-Teton National Forest  
Jackson Ranger District  
340 N. Cache St.  
Jackson, WY 83001

Dear Jackson District Staff,  
Below you will find AMPL's input surrounding the EA released on 1/24/25.

## **Introduction**

First, AMPL would like to thank the Bridger-Teton National Forest Jackson District for considering expanded EMTB use on our local trails. We recognize that your staff has put countless hours into this proposal and now the draft Environmental Analysis (EA) in order to meet the outlined purpose and need for the expansion of EMTB access. Thank you.

The addition of EMTBs on our local trail systems has become contentious within our community. After reading through the many comments submitted following the release of the scoping document, it appears there is a lot of misinformation and a general lack of understanding as to what an EMTB is and how they integrate into the multi-use recreation world. This, we feel, is largely due to the advent of this new technology and resistance to change within our community.

For those not intimately familiar with e-bikes, this new technology can be intimidating. The majority of the misinformation and fear mongering surrounding EMTBs is around the speed at which they travel. There is a general belief that if EMTBs are allowed on non-motorized trails, people will be zipping along at a motorcycle's pace, running other users off the trails. There is talk about head-on collisions, users traveling at speeds that are out of control, and concern that EMTBs will be a burden to our local first responders.

AMPL feels it is important to point out that much of the rhetoric surrounding EMTBs has strong parallels to when other new forms of recreation/technology were introduced. In the past, we have seen this when snowboards first started showing up at ski areas in the 1980s and when mountain bikes became more popular on public trails in the 1990s. Today we see both user groups in a variety of front and backcountry settings, coexisting well with other user groups.

When we look at another user group as less valuable, or we have a "not on my trail" mentality, we lose an opportunity to bolster a larger group of public land stewards. EMTBs are a great equalizer. They take the intimidating sport of mountain biking and make it more approachable

for people. As identified in the EA, EMTBs allow those with physical disabilities to continue riding. They allow multiple generations of families to get outside and ride together. They allow riders a way to travel beyond the congested “close to town” riding areas and experience places they would otherwise be unable to reach. We hear a lot of concern surrounding the impact of people traveling into these remote areas, but what about the impact of the next generation never seeing these places? When users get those opportunities to radically engage with their public lands and have those memorable experiences, those individuals develop a sense of ownership and stewardship to those lands. Times are changing, and uses on the Forest are changing. We need to adapt our management strategies to accommodate these new uses and facilitate inclusivity of recreation types on our public lands.

We are all living in a time with a lot of uncertainty. Between the shift in our Nation’s leadership and the continued threat of transferring federal lands to the states, the future of our public lands is unknown. The core of AMPL’s mission is to bring our region’s diverse user groups together to advocate for access to high quality recreation opportunities in and around Teton County. Recreation is VITAL to the future health of our National Forests. As the National Forest Service continues to see budget cuts and reduced staffing, the work of partner organizations like AMPL grows more and more important. When we provide opportunities for diverse recreation types, we bolster our population of public land advocates.

AMPL thanks the BTNF Jackson District for the opportunity to participate in this public process and hopes to be a positive voice in guiding our local land managers to signing a decision that will be best for the future of our public lands.

## **EA Comments**

The Draft Environmental Assessment did a phenomenal job disproving some of the misinformation that dominates EMTB conversations using specific studies and data. In particular, the study that references the specific speeds in which EMTBs actually travel provides our community with factual information rather than opinion based assumptions. Due to a lack of understanding of what an EMTB actually is, many believe that because it has a motor and is regulated as a motorized vehicle, allowing EMTBs on our trails will result in people constantly getting passed and having to jump out of the way of these users. In reality, EMTBs addressed in this proposal are vastly different from dirt bikes, and are MUCH more similar to a mountain bike. We feel strongly that most users will not be able to tell the difference between EMTBs and MTBs when allowed on the same trails.

One of our fears about this EA is that this valuable information discovered in the BTNF’s research will not reach the majority of the public. Many people will not take the time to read the full 67 page document and the opinion based safety concerns around EMTBs will continue to dominate the discussion. **AMPL urges decision makers to analyze all comments critically and adopt a solution on the fact-based information discovered during scoping and this thorough analysis.**

As the BTNF Jackson District moves forward in making a final decision on where EMTBs should or shouldn't be allowed, we press you to consider the consequences of missing your identified purpose and need. EMTB users are looking for a traditional mountain bike experience with pedal assistance. The decision should provide users with the same access to high quality recreation opportunities that other users have. There needs to be trail options for all ability levels, users looking for close to home rides after a long work day, and those more adventurous looking for a long ride in the backcountry on a day off. Anything short of this will not meet the purpose and need.

AMPL is concerned that if either the Proposed Action or the Alternative Action are selected on their own, the purpose and need originally presented to the Jackson District would be missed. Neither option independently provides adequate, diverse, and high quality riding experiences that EMTB users are looking for. Curbing illegal EMTB use on non-motorized trails is a strong driving force for this proposal so it is imperative the BTNF listens to the user group requesting a change in access, or illegal use will continue to grow. We do feel strongly, however, that a combination of both the Proposed Action and Alternative Action could sufficiently meet the goals of this proposal and give EMTB riders sufficient access to public trails.

Lessons can be learned from how access has changed for the motorized community on the BTNF over the past 30 years. Before the 2009 Travel Plan, dirt bikers had access to high quality riding opportunities in the Gros Ventres and Snake River Ranges. These once open routes provided users with the type of trails they were looking for; long distance, varying terrain, and scenic views. After the 2009 plan was released, dirt bikers were subjected to riding in 3 areas; Horsetail, Munger Mountain, and Mosquito Creek, all of which are isolated and impossible to connect trail systems without driving long distances on paved roads. While in recent years, local non-profits like AMPL have worked hard to improve these trails for this user group, dirt bikers are still left wanting more/different access that allows them to travel longer distances through varying terrain.

The above story is relevant to the proposed action to provide more access to EMTB riders. The 2009 travel plan grossly missed the purpose and need of dirt bikers when designating motorized single track trails. Over the past 3 years of discussions with the BTNF, AMPL is aware that dirt bikers continue to trespass on closed trails that in some cases were once open. These illegal actions are a direct cause of a poorly done Travel Plan that restricted this user group to trails that are simply not desirable to their sport. So, users choose to break the laws and go seek the rides they want and hope they don't get caught. This illegal use illustrates what can happen when a decision on access misses the purpose and need.

## **EA Specifics**

Below, we break down specific elements discussed in the EA and provide constructive input to help the BTNF best manage EMTB use on the National Forest. EMTBs are here and will be for decades to come. AMPL is dedicated to this EA and will help the BTNF implement whatever

decision is made through education, trail work, and community outreach to coach public land users to be stewards.

### *Safety*

As quoted in the EA, studies show that EMTBs travel at nearly the same speeds as traditional mountain bikes. “People on traditional bikes travelled faster than e-bikes on downhill sections (15 mph vs 13.5 mph) and people on e-bikes travelled faster than traditional bikes on uphill sections (13.8 mph vs 12.9 mph)” (Nielson et al., 2019b). AMPL feels that this is extremely valuable data that disseminates much of the misinformation surrounding EMTBs and the speeds at which they travel. Therefore, the speed at which EMTBs travel should not be factored into making this decision.

Other safety-based topics discussed centered around the weight of EMTBs, which on average, are 10-15 lbs heavier than traditional mountain bikes. AMPL feels discussion surrounding the weight of EMTBs is irrelevant in making a decision surrounding safety. Individuals within a user group fluctuate significantly more than 10-15 lbs. For instance, a 200lb father could be riding mountain bikes with their 120 lb daughter. Does one present a significantly higher risk to other users? Rider skill and awareness are centric to user safety, not weight. Therefore, the weight of EMTBs should not be considered in making a final decision.

### *Sound*

The sound data referenced on page 36 of the EA discusses the level of wind noise emitted by a class 3 e-bike traveling 28 mph. As discussed under safety, EMTBs aren’t often traveling at those speeds, and in reality travel nearly the same speeds as traditional mountain bikes. The sounds emitted by EMTBs are nearly the same as traditional mountain bikes. All trails in both the Proposed Action and Alternative 1 are currently open to mountain bikes, so sound should not be factored into the final decision.

### *E-Bike Data From Roads/Pathways*

The EA quotes many studies that were performed on roads and pathways. For instance, on page 20 a study is referenced about the demographic of people most likely to be severely injured on e-bikes. At the bottom of that paragraph, the EA states “It is important to note that these studies were done primarily with e-bike use on roads, not natural surface trails.”

It is AMPL’s position that this information should have no impact on the final decision of this proposal and should be removed from the EA. With the exception of Old Pass Road, this EA is specifically in regards to EMTBs on natural-surface, single-track trails where mountain bikes are already allowed. Riding an EMTB on natural surface trails and riding a commuter bike on a pathway are two completely different activities.

### *Recreation Experience*

It is AMPL’s opinion that because EMTBs look, sound, and travel at similar speeds to traditional mountain bikes, other users on non-motorized trails will hardly notice the introduction of EMTBs.

It is worth noting that in the EA, impacts to other users are only considered from the non-motorized perspective. Alternative 1's solution to creating more EMTB access is to perform trail work on the motorized trail systems to make them more appealing to EMTB riders. The EA does not adequately address the impacts that these actions would have on the dirt bike community.

Dirt bike opportunities are already incredibly limited in the Jackson District. While the EA references 74 miles of open motorized trails, about half of those miles are double-track trails or roads and are not desirable to users traveling on 2 wheels. That leaves roughly 35 miles of open trail for dirt bikers spread out over 3 different trail systems (Munger, Mosquito, and Horsetail) all of which require loading your bike into a vehicle to travel between trailheads. For perspective, most dirt bikers enjoy a 35 mile ride in a  $\frac{1}{2}$  to  $\frac{3}{4}$  day ride. In order to accomplish that type of a ride in the Jackson District, one would have to separate rides with a 15-60 minute drive between trailheads. AMPL notes this to show how the dirt bikers are already an extremely underserved, oppressed user group in this community. Again, this is a direct result of the 2009 Travel Plan that missed the purpose and need of the dirt bike community.

Funneling EMTB users to the already limited motorized trail systems will undoubtedly impact users riding their dirt bikes. The work required to make these trails more suitable to EMTBs will negatively impact the experience dirt bikers are looking for. Traditionally, dirt bikers enjoy more challenging, technical trails than mountain bikers looking for trails with flow and less challenging obstacles. For instance, the trail character of Mosquito Creek's Crankshaft Trail is vastly different from that of the Arrow Trail on Teton Pass. Funneling EMTBs to these motorized trails will also change the dynamics of users on motorized trails. While the EA references non-motorized users having to pull over to constantly let EMTBs pass numerous times, it makes no mention of how dirt bikers will be affected when a new user group that truly travels at a much slower pace is now forced to ride the same trails as dirt bikers.

While AMPL is fully aware that EMTBs and dirt bikes currently share these trails, Alternative 1 proposes measures such as re-routes and new trail construction to make these systems more attractive to EMTBs and is designed to draw that user group to these motorized trail systems. This EA does NOT adequately address how these actions will affect the motorized community.

Over the past 20 years, the Bridger-Teton has shifted its mindset of multi-use trails to segregated use trails. While AMPL feels this is appropriate in some very specific cases such as the downhill mountain bike trails on the Pass, by and large it fuels conflict when making land use decisions. Rather than users having an appreciation of others and how they choose to recreate, our local culture has a toxic mentality of "my form of recreation is more important than yours". For motorized users reading this EA, it is clear that the BTNF cares more about how their decision impacts non-motorized users rather than ALL users of the Forest. This is not how we grow a population of public land advocates and AMPL does not support further dividing user groups by banishing EMTBs to the few mediocre motorized trail systems currently existing in the Jackson District.

### *Classification of EMTBs*

In the EA, there is concern about the similarities in appearance between the 3 different classes of EMTBs. It would be challenging, if not impossible, for law enforcement to be able to identify what class of bike a user is riding from a reasonable distance. AMPL agrees that this presents a challenge to enforcing a class 1 only law. While a class 3 bike can receive power up to 28 mph, as quoted above, average climbing speeds of EMTBs is only 13.8 mph. With this in mind, users would be traveling similar speeds no matter which class bike they are riding.

AMPL feels the best solution to this problem is to allow Class 1 and Class 3 EMTBs on the proposed non-motorized trails. Class 2 bikes introduce a distinct difference with the presence of a throttle. Although this throttle is FAR different from one on a motorcycle, it is a clear distinction that law enforcement officers could use for probable cause to make a stop and detain someone to check the class of their bike.

AMPL also feels that the majority of users will be riding Class 1 EMTBs regardless of what classes are allowed on trails. Local shops sell Class 1 bikes exclusively because they are the desirable tool for the trail systems EMTB riders enjoy. While we acknowledge that consumer direct companies sell bikes that fall under all 3 classes, they are cheaply built, don't hold up to the abuse of natural surface trails, and users will quickly realize they are not the right bike for the terrain.

### *Construction of New Trail*

When making the decision to construct new trails, AMPL feels it is important to be very critical about each project. At Shadow Mountain, AMPL feels new construction/adopting popular non-system trails is a great idea. Shadow Mountain would be a perfect place to allow EMTBs if those trails were purpose built. With a climbing route and some downhill trails, users would be able to ride without shuttling and further congesting the already busy road that accesses the popular camping in this area.

The Shadow Mountain trail network has needed this trail construction and site planning for well over a decade. Not only will this area be vastly improved with the addition of purpose built trails, but our region is lacking a place where users can both camp and ride their bikes without having to drive to a trailhead. This project would not only benefit locals, but also anyone looking to visit and enjoy mountain biking in the Jackson region. Over the last 5 years, the BTNF and Jackson Hole community has appropriately shifted from promoting our region as a tourism destination to sustainable visitation with high quality recreation opportunities. The formalization of the trail system in conjunction with the improvements to the camping infrastructure already completed at Shadow Mountain would both align perfectly with those goals.

In Mosquito creek, the proposed new trail on the west side of Mill Creek would add substantial value to the motorized trail system that already exists. The proposed new trail generally parallels an existing section of Crankshaft that descends down the old road bed along Mill Creek. As the organization responsible for maintaining this trail system, AMPL is fully aware

that in the spring and during large rain events, water flows down long sections of this trail, eroding the trail surface to cobble stones. The proposed new trail would be further removed from the drainage, built following trail sustainability guidelines, and offer riders an alternate option to complete the Crankshaft loop. AMPL feels this secondary route option would benefit not only the EMTB community, but also those who dirt bike these trails.

AMPL does feel strongly that in the near future, that section of Crankshaft utilizing the old Mill Creek roadbed should be re-constructed to better handle water drainage. This section of existing trail could also serve as a great climbing option for EMTBs looking to ride the new trail without completing the full Crankshaft loop. AMPL would appreciate the opportunity to take on this project and improve this section of trail for all users.

With the continual budget cuts that the Forest Service has faced over the past decade, and the recent termination of seasonal and probationary employees, the Forest Service will be unable to staff a trail crew. This means that the burden of trail construction will fall on the shoulders of local non-profits, who are already working hard to maintain the trails that are already in existence. While AMPL is excited to assist the BTNF with new trail construction, it would be short sighted to select ONLY Alternative 1, knowing the BTNF does not currently have the resources to implement this decision without outside help.

Also, if Alternative 1 is selected, EMTB riders will have little change in riding opportunities until the necessary funds are raised through donations and grants. AMPL urges the Forest Service to not exclusively rely on new trail construction to meet the purpose and need of this proposal, but to also re-designate existing, non-motorized trails to allow EMTBs.

#### *EMTBs And Teton Pass*

AMPL feels that these trails are vital to providing EMTB riding opportunities that will match the Purpose and Need outlined in the EA. Arrow Trail, Snotel Trail, Phillips Ridge, and Phillips Canyon offer a traditional mountain bike experience close to the town of Wilson. The community's bike paths that connect the towns to these trails offer riders an opportunity to pedal their EMTB to and from the trailhead, making this a high value trail network. Only including the designated downhill or jump trails will only serve the most adventurous riders and would miss the majority of users.

Allowing EMTBs on Old Pass Road and the downhill specific trails also makes a lot of sense, however. This gives those riders who already enjoy those trails the opportunity to self shuttle on their EMTB, rather than relying on vehicles to take them back to the top of Teton Pass.

Relying solely on Munger, Mosquito, Shadow, and Swinging Bridge to meet the purpose and need of this proposal and the EMTB community will not work. These trailheads are destinations that users have to drive to. They don't adequately service the majority of our community that lives in town and relies on access closer to their homes and work. The trails north of Teton Pass are vital to the success of this proposal, as they are connected to town via bike paths.

### *Parking Congestion*

AMPL agrees that the parking conditions at Phillips Ridge and the top of Teton Pass are less than ideal. On busy days, the limited parking can present safety concerns for motorists on HWY 22. We feel this is an example of an opportunity for partner organizations like AMPL to educate the public about other parking options that reduce congestion at these busy trailheads. With effective user education, we can communicate to EMTB riders the benefits of commuting from home or parking at Stilson and riding the pathway to their favorite trails. These alternative parking options are only practical with the allowance of EMTBs on the Teton Pass trail system.

Within the submitted public comments, there are a lot of opinion based statements that argue allowing EMTBs on Teton Pass will drastically congest these trailheads. AMPL disagrees and we believe that allowing EMTBs has a greater potential to be a positive way to REDUCE trailhead congestion.

### *Season Extensions of Big Munger and Horsetail*

AMPL believes in effective seasonal closures to provide habitat security for vulnerable species. In the Proposed Action, season dates for Horsetail and Big Munger would have been extended from their current dates open to motorized (July 1-September 9) to July 1st through December 1st. Under Alternative 1, the dates for Horsetail would stay the same as they are currently (July 1-September 9), lower Munger trails would change to July 1- November 30, and Big Munger would stay open July 1-September 9.

AMPL would like to see more consistency and more leniency for the season dates on Horsetail as well as the Munger Trails. AMPL proposes moving the opening date to June 15th to ensure elk have an opportunity to calve without being disrupted by humans, while giving users the opportunity to ride these trails for two weeks before the July heat. For the fall closure date, we believe there could be an extension to allow for more EMTB opportunities without negatively impacting mule deer and pronghorn migrations, and therefore propose a season closure date of October 31.

Per Wyoming Fish and Game's letter submitted during the scoping period of this proposal, the motorized season on Munger Mountain is closed on September 9th to prevent animals from getting pushed onto private land surrounding Munger. Their intent with closing motorized use is to allow for hunters to harvest more elk to achieve their management goals. If this herd is over objective and more elk need to be harvested to achieve healthier numbers, allowing EMTBs access to Munger through hunting season would help get more hunters into these areas. As acknowledged in the EA, hunters are becoming a large segment of the EMTB user group. EMTBs provide hunters with a means of accessing distant hunting spots without the use of horses.

Current use dates are too restrictive, and the proposed action dates are too extensive. We urge the BTFN to find a middle ground that extends access to EMTB riders that still gives animals habitat security during their most sensitive periods.



### *Illegal Use Reporting App*

AMPL is strongly opposed to such a tool. We feel like this would violate user privacy, encourage false reporting, and lead to further division of user groups. While AMPL does not tolerate illegal use on the National Forest, we also feel the Forest needs to establish a higher level of trust amongst public land users. If EMTB users are allowed adequate, high quality opportunities to recreate on public lands, illegal use will decrease, therefore decreasing the burden on law enforcement. Creating a reporting platform that would single out one particular user group would be counter productive and we do NOT support this idea.

### *Trail Construction Dates*

In the EA, it mentions no trail construction will be performed before July 15th. AMPL asks the BTNF to reconsider this blanket rule and create specific dates for each location. For instance, trail work in Mosquito Creek should be permitted within the same dates as motorized recreation is allowed to occur. As the BTNF is well aware, the trail building season is already exceptionally short. From past experience operating equipment in Mosquito Creek, AMPL knows that some of the best trail building conditions are from the middle of June through early July, when the dirt is still soft but not muddy.

The July 15th start date also presents staffing challenges. Most trail crew employees are seasonal and rely on starting their summer job as soon as conditions permit. AMPL will be staffing extra employees to accomplish new trail construction goals and hiring becomes challenging when those employees cannot start until the middle of July. We ask that the BTNF reconsider an earlier start date for trail construction and AMPL will work with BTNF staff to ensure digging conditions are appropriate before work commences.

### **Conclusion**

It is AMPL's position that EMTBs and traditional mountain bikes are strikingly similar. To classify and regulate a pedal assisted mountain bike the same as a motorcycle with a 450cc internal combustion engine is grossly absurd. While one day we would like to see EMTBs managed the same as mountain bikes, we feel that a hybrid approach to adopting both the Proposed Action and Alternative 1 would be a great first step.

New trail construction in Mosquito Creek and Shadow Mountain is appropriate, achievable, and benefits more than just EMTB users. Extending Season dates on Horsetail and Munger Mountain an extra month would have positive impacts to users while having minimal impacts to wildlife. Allowing EMTBs on existing Teton Pass trails is vital for providing this user group with diverse riding opportunities.

The facts outlined in the EA show that EMTBs will have minimal ecological impact. By and large, the only true issue identified in scoping is the social issue. Some people are resistant to change and have a false sense of ownership on public trails, when in fact they belong to everyone. If a hybrid decision were to combine the Proposed Action and Alternative 1, the discussion surrounds a new use on roughly 100 miles of 744 mile summer trail network. Even within the Teton Pass system, there will still be options for users to be on trails that don't allow EMTBs.

Public land users are looking for new, different ways to get outside and enjoy their public land. AMPL feels the benefits of keeping these individuals outside, recreating, becoming public land advocates completely outweighs any contrived benefit of neglecting this user group.

Thank you for taking the time to read our comment. We hope to be a constructive voice in this process and help guide the BTNF in making a meaningful difference for the EMTB community.

Sincerely,

AMPL

Attn: Will Mook, Executive Director