Response to Public Comment on Proposed Shared Trail Use Designation

From:

Lost Creek Guest Ranch, LLC.

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To:

Jackson Ranger District

Re: E-Bike Use Designation on Select Jackson Area Trails #64890

Lost Creek Guest Ranch has long held a permit with the Jackson Ranger District for guided horseback day use on Shadow Mountain, operating alongside other trail users. However, safety concerns outlined below put our guests and permitted activities at risk. The anticipated increase in users will further strain emergency services and Forest Service staff responsible for enforcement. While e-bikes are classified as non-motorized vehicles, we believe their impact on the trail system, wildlife, and user experience is comparable to that of off-highway vehicles (OHVs). For these reasons, we oppose the proposed use designation and any expansion of motorized access on Shadow Mountain.

### **Safety Concerns**

The proposed action may increase the potential for collisions and injuries. E-bikes are quieter than most OHVs, requiring guides to be especially vigilant at trailheads and crossings to avoid surprise encounters. The pedal-assist feature allows users to access trails and terrain they may not have the experience or ability to navigate safely. E-bikers may ride uphill on routes traditionally used for downhill travel, disrupting trail flow, and increasing the likelihood of accidents.

Unlike guided horseback tours, most e-bike use is unguided, placing full responsibility for safety and medical care on individual users. Studies indicate that e-bike incidents are more common among older users and those with limited cycling-specific training, leading to slower reaction times and reduced control. This trend contributes to a higher incidence of traumatic injuries, particularly in remote areas, which places additional strain on Teton County Search and Rescue.

### **Enforcement Challenges**

The proposed action may be unenforceable. There is already significant documentation of illegal e-bike use on non-motorized trails. Advancing e-bike technology makes distinguishing them from traditional bicycles increasingly difficult, further complicating enforcement. Additionally, Forest Service staffing and backcountry ranger positions have been steadily defunded, reducing on-the-ground oversight. While signage may help, excessive signage detracts from the backcountry experience.

### **Impact on Wildlife and Trail Degradation**

The proposed action may further disrupt wildlife and contribute to trail erosion. Longtime property owners in the Lost Creek subdivision have observed a decline in wildlife sightings near Shadow Mountain, likely due to increased motorized activity that penetrate wilderness areas. Although mountain bikes are non-motorized, they already cover more ground than hikers and horseback riders; e-bikes extend this range even further, amplifying the potential for wildlife disturbances.

E-bike motors do not merely provide a minor assist—they typically quadruple the rider’s pedaling power. If e-bike use expands at the same rate as its popularity, wildlife disturbances will increase, leading to habitat compression and higher mortality rates. While e-bikes are quieter than most OHVs, their combination of speed and stealth increases the likelihood of surprise wildlife encounters, raising concerns about bear-human interactions and displacement of wildlife from critical habitat.

Furthermore, increased bike traffic and potential increase for commercial rental operations will alter the character of Shadow Mountain. Higher speeds and deeper trail penetration will accelerate soil displacement, causing long-term damage to trail integrity.

### **Setting a Dangerous Precedent**

The proposed action sets a precedent for increased mechanized use on Shadow Mountain. While the environmental assessment claims that this proposal will not establish a precedent for future actions, it is widely recognized that mechanized recreation has a greater environmental impact than non-mechanized recreation, and motorized use exacerbates this degradation.

Local rental operators have already expressed that Alternative 1 does not sufficiently meet the proposal’s stated purpose and need, suggesting that “more trail miles for various users are needed.” This raises critical questions:

* How many miles of trails are considered enough for e-bike users?
* Will commercial permits be issued to tour operators? Roughly 10 years ago the district issued permits for guided OHV tours. Has any data been collected and reviewed to identify visitation, trail degradation, and conflict among other user groups?

### **Conclusion**

Lost Creek Guest Ranch supports the Jackson Ranger District’s mission to provide diverse, high-quality, and sustainable recreational opportunities on Shadow Mountain. However, the current classification of e-bikes as non-motorized, creates a loophole that ignores their comparable impact to OHV’s.

In an era of unrestricted recreation, we must ask: Is there still space for the beloved wildlife and unique character of Shadow Mountain to thrive? Or will the area succumb to the degradation seen in other overused motorized recreation zones?

**Sources:**

International Mountain Bicycling Association (IMBA)

2004 study in the Oregon Starkey Experimental Forest and Range

Morgan Lommele of People for Bikes, to Krista Sherwood, NPS, Conservation & Outdoor Recreation Programs

Federal Lands Highway Research Study: E-Bikes in Public Lands – Final Report November 2022