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To: Todd Stiles, Supervisor, Bridger-Teton National Forest, Teton District  
From, Gary Kofinas, Chair, Teton Backcountry Alliance  
Regarding: E-Bike Use Designation on Select Jackson Area Trails #64890

The Teton Backcountry Alliance (TBCA's) is a local non-profit organization that promotes responsible use, sustainability, wildlife conservation, community, and safety in the Teton backcountry. The organization's primary efforts are centered on winter recreation, and to that end TBCA has an interest in maintaining the year-round cultural and ecological integrity of the region. TBCA comments on the proposal to allow e-bikes in the Teton backcountry were articulated in TBCA's letter, submitted as a part of the EA Scoping process. When reading TBCA's comments below, please review that letter since it offers additional detail to what is presented below.

- TBCA's perspective of the proposed action can be summarized as: *Keep e-bikes off the Teton Pass trail system, including Old Pass Road.*
- Areas such as Munger Mountain, Mosquito Creek, and Shadow Mountain are better suited for e-bike recreation in that e-bikes in these areas will result in fewer user conflicts. The use of e-bikes on the single track of Teton Pass and on Old Pass Road (OPR) will degrade the character of the area by changing it from non-motorized to motorized. TBCA, therefore, argues that Teton Pass be removed from consideration when deciding where e-bikes should be allowed.
- The single track trails of Teton Pass were created with the intent that they would be used by NON-motorized/human powered recreationists and horses. The proposal to allow all three types of e-bikes on the single track and Old Pass Road is tantamount to allowing motorcycles in these areas.
- Some have suggested that allowing e-bikes on Old Pass Road without allowing them on the single track of Teton Pass should be included as an action. How will this restriction be enforced? BTNF currently has LIMITED-to-NO enforcement capacity at the Teton Pass trailheads and its backcountry. With the future reduction in FS staffing, that capacity is likely to be reduced even further. The expectation that e-bikers will voluntarily comply with this rule and stay only on OPR is unrealistic. The whole area should have no e-bikes.
- The Old Pass Road currently does not meet the standards of a "pathway" (i.e., no signage, many drop offs, and more). Allowing e-bikes on OPR would mean that the Forest Service is ignoring its obligation to meet standards that insure the public's safety.
- TBCA believes that the proposed action for summer use has implications to winter recreation, and is not adequately considering emerging technologies. These technologies include e-snowbikes, e-snowboards, e-skis, and e-rope tows, and more. By allowing e-bikes to be used on the Teton Pass trail system in the non-snow months, the Forest Service is essentially opening the

door to the use (and or proposed use) of future winter e-technologies that fall outside current definitions and rules.

In summary, while TBCA appreciates that allowing the use of e-bikes may be acceptable in some areas, it strongly believes that Teton Pass trail single track trail system and OPR should be managed as non-motorized areas - not allowing e-bikes.

Please let me know if you have questions about TBCA's comments or need addition information.

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