



## **COALITION OF LOCAL GOVERNMENTS**

1689 COUNTY ROAD 263  
FORT BRIDGER, WY 82933

COUNTY COMMISSIONS FOR LINCOLN, SWEETWATER AND UINTA - WYOMING, AND DAGGETT-UTAH;  
AND CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, STAR VALLEY, SUBLETTE, SWEETWATER,  
AND UINTA - WYOMING

February 24, 2025

### **VIA E-PLANNING WEBSITE**

Todd Stiles  
Jackson District Ranger  
Bridger-Teton National Forest  
P.O. Box 1689  
Jackson, WY 83001

Re: Comments on E-Bike Use Designation on Select Jackson Area Trails  
Draft Environmental Assessment

Dear Mr. Stiles:

The Coalition of Local Governments ("Coalition") submits the following comments on the Bridger-Teton National Forest's E-Bike Use Designation on Select Jackson Area Trails Draft Environmental Assessment. The Coalition appreciates the opportunity to provide a local government perspective and to represent its constituents in these comments. The Coalition members support multiple use of the National Forests and are in favor of making the Forest more accessible to all users, including motorized uses such as e-bikes.

The Coalition is a voluntary association of local governments organized under the laws of their State to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§ 11-16-103, 11-16-122, 18-5-201; Utah Code § 17-27a-102(1)(a). Coalition members include Lincoln County, Sweetwater County, Uinta County, Daggett County, Lincoln Conservation District, Sweetwater County Conservation District, Uinta County Conservation District, Sublette County Conservation District, Little Snake River Conservation District, and Star Valley Conservation District. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotion and support of habitat improvement, the projects and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf

of members for the educational benefit of those proposing federal land use plans and land use projects.

Currently, all three classes of e-bikes are allowed on roads and trails open to other motorized vehicles. The Proposed Action and Alternative 1 would expand the e-bike use areas by opening some existing non-motorized trails to e-bike use, constructing new trails for e-bike use, and/or changing existing seasonal restrictions to increase the e-bike open season. The Coalition is not opposed to these changes and overall supports additional opportunities for motorized vehicle use, including for e-bikes. The Coalition would only caution the Forest Service in its opening of non-motorized trails to e-bike use due to user conflicts that could arise. There is always a balance to be made with multiple use and by opening or expanding non-motorized trails to e-bike use, the Forest Service must ensure that the other uses are not reduced or restricted to address potential conflicts (i.e. horseback riding and livestock grazing).

The Coalition would also encourage the Forest Service to consider potential impacts to vegetation and trail damage due to the likely increased use of those non-motorized trails by e-bikes and from the construction of new trails and rerouting of existing trails to support e-bike use. While e-bikes may have a similar overall impact as mountain bikes, the concern is the increased number of users on the non-motorized trails and the impact this increased use will have on the trails and nearby vegetation. The Draft EA recognizes in the recreation section that the proposed action would increase the density of use and volume of use. *See* Draft EA at 23-24, 26-27. The Draft EA should address how this additional and increased use will impact the trails and surrounding vegetation.

Finally, the Coalition does not agree with the Forest Service about this decision not having any precedent on e-bike use on the rest of the Bridger-Teton National Forest. Draft EA at 4-5. While the opening of additional non-motorized trails to e-bike use would require additional environmental analysis, this decision opens the door to opening additional non-motorized trails to e-bikes in other Ranger Districts. There should also be a desire that any future decision on e-bike use is consistent across the Bridger-Teton National Forest. If the Forest Service is truly trying to provide more opportunities for e-bike use and reduce the amount of illegal e-bike use on closed trails by opening more trails to e-bike use, then it must be prepared to consistently manage e-bike uses (including e-bike types and seasons of use) across the Bridge-Teton National Forest and not just in the Jackson Ranger District.

The Coalition appreciates the Forest Service's consideration of its comment.

Mr. Stiles  
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Sincerely,

A handwritten signature in cursive script that reads "Eric South". The signature is written in black ink and is positioned above the printed name and title.

Eric South, Chairman  
Wyoming Coalition of Local Governments