February 21, 2025

I am responding to the proposed shared trail use designation on select Jackson area trails under the draft environmental assessment (#64890), and specifically as it applies to Shadow Mountain.

The question is how will the Forest Service address the proliferation of electric bicycles which has led to a major uptick in higher-power models that have flouted established e-bike laws, often being used on public roads, city streets and sidewalks, and bike paths to the chagrin of many local residents. Now the Forest Service wants to permit these “bikes” into the natural environment of the forest on Shadow Mountain. Already gone is the serenity and quiet atmosphere of nature when the Forest Service permitted ATV tours to roam the paths and roads on Shadow Mountain. Gone are the bears, the moose, the elk, the deer, and other creatures who roamed Shadow Mountain, and have been driven deep into the Teton Wilderness.

Many “e-bikes” now use traditional electric bicycle components but are capable of achieving speeds and power levels that give them performance closer to mopeds and light motorcycles. This phenomenon has led to a heavily charged debate around the colloquial term “e-bike” and the regulatory term “electric bicycle”. The main question has become whether increasing the power and speed of such bikes pushes them outside the realm of bicycles and into the class of mopeds and motorcycles. So the underlying issue facing the Forest Service is how to limit use of e-bikes so as not to follow the growing trend of higher speed and power levels, which could well transition to seeing mopeds and light motorcycles cruising on the paths, trails, and remaining uncut trails on Shadow Mountain.

The Town of Jackson recently addressed the growing number of high-powered electric bikes and has placed limitations on where such bikes can be used in the city limits. Teton County has invested hundreds of thousands of dollars towards the construction of miles and miles of bike paths that can take a bike rider from Albertsons along the road to Wilson, and then up the Old Road to the top of the pass; bike enthusiasts can ride from Wilson to Teton Village; bike riders can leave the Town Square and go all the way to Moose, and on to Jenny Lake, or they can head south on a bike path all the way to Melody Ranch and beyond. How much access do these bike enthusiasts need, and why does the Forest Service believe that Shadow Mountain needs the addition of 3.8 miles of new trail construction, or 2.2 miles of existing non-system trails be adopted for us, or opening 2.2 miles of existing road currently closed to e-bike use.

I strongly oppose the proposed use designation under consideration for Shadow Mountain.

William A. Mingst