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Comments:

October 25, 2023

Todd Stiles, District Ranger

Bridger-Teton National Forest

RE: E-Bike Use Designation on Selected Jackson Area Trails

Dear Todd,

On behalf of Friends of Pathways (FOP), thank you for considering our comments on E-Bike Use Designation on Select Jackson Area Trails. This is a topic that elicits many opinions and we appreciate the groundwork that has gone into drafting a preliminary proposal. FOP partners with the Bridger-Teton National Forest (BTNF) to develop and steward over 130 miles of front-country, natural surface trails that welcome a diverse range of users and activities. We are not a special interest group for one particular trail activity, but focus instead on building and maintaining a trail system which accommodates many modes of human-powered recreation.

A primary goal for FOP's trails program is ensuring a sustainable and accessible trail system; that is a system which welcomes a diverse range of human-powered users and activities and holds up to increased usage with less degradation and annual maintenance needs. With this in mind, we submit the following comments regarding this new proposal.

1. Expansion for Class 1 E-Bike Use on Teton Pass

FOP supports the cautious expansion of Class 1 e-bikes for summer use on 27.5 miles of trails on Teton Pass, including the Old Pass Road. Because Teton Pass already has many separated-use trails, we believe it is a good location to try expanding access to e-bikes. We suggest the BTNF establish more specific metrics to evaluate this effort which can then be used to inform future use or expansion of use. There were about 227,000 user counts on Teton Pass in 2022, a small number when compared with the Cache-Game area, which had approximately 432,000 user counts in the same period. We believe there is room for more users on the Teton Pass trail system. It is still undetermined whether usage numbers will increase significantly on Teton Pass because of this proposal, or if people will simply be trading in their old mountain bikes for e-bikes. Should there be future discussions about allowing e-bikes in the Cache-Game area, FOP feels strongly that additional trail improvements will be necessary to better separate trail users and activities.

From a sustainability standpoint, we do not think there is a distinction between Electric Mountain Bike (EMTB) tires and regular mountain bike tires in regards to trail erosion or impact. In our experience, horse, hike and motorcycle/dirtbike trails are more likely to have erosion and chronic maintenance issues. In addition, there is merit to allowing e-bike users to ride up the Old Pass Road to access designated trails instead of using a vehicle to shuttle their bikes up the highway.

2. Improving Accessibility to Local Trails for People with Differing Abilities

FOP supports the use of Class 1 e-bikes in the proposed designated areas to improve accessibility to local trails. E-bikes may play an important role for people who cannot access trails under their own power, or those who have health conditions or other physical limitations that keep them from being able to continue mountain biking. Please consider adding the Old Pass Road Loop trails to the expanded area, since these trails were designed to accommodate adaptive trail equipment.

3. Extension of Class 1 E-Bike use on Munger Mountain and Horsetail Creek Areas

FOP does not believe that EMTBs have the same impacts to the trail system and surrounding wildlife as motorcycles and therefore supports the extended e-bike season on Munger and Horsetail Areas. Data collectors on Munger Mountain logged just under 30,000 counts last year, which is significantly lower than total counts on either the Teton Pass or Cache-Game trail system. FOP supports closure of the Big Munger trail to e-bikes from December 1 to July 1. Based on anecdotal and direct observations of closure violations the past several years, additional BTNF education and enforcement will be necessary to achieve this goal. FOP proposes continued monitoring and data collection on Munger Mountain to track usage and impacts to the Munger trail user experience.

4. Permit System for E-Bikes and Other Opportunities to Promote Responsible Use of the Trails

FOP enthusiastically supports the proposed sticker permit system for Class 1 e-bikes and additional opportunities to educate e-bike users about seasonal and fully restricted areas as well as common trail etiquette. To a great extent, the success of this e-bike expansion program relies on the effectiveness of the education effort and the willingness of e-bike users to comply with trail restrictions, such as not riding in Cache-Game or the Palisades Wilderness Study Area (PWSA). Bike shop owners and employees are in an ideal position to model best practices and encourage compliance from those who rent or purchase e-bikes from their shops. FOP will gladly partner with bike shops and the BTNF to share educational collateral and promote a unified message.

5. Include Increased BTNF Enforcement to Ensure E-Bike User Compliance

Please include an enforcement plan in your future environmental analysis. This component is currently missing from your scoping document. When enforcement measures are lacking, the public becomes the de facto police force, which only exacerbates tensions amongst trail users and makes it harder for people who ride e-bikes to make a winning case for their inclusion or expansion on non-motorized multi-use trails. Please craft an enforcement plan and dedicate the necessary resources to deal with scofflaws and others who abuse the public honor system.

Thank you for this opportunity to comment, and for all of the preliminary work that has gone into this effort.

Ignoring the e-bike issue only makes it more difficult to address in the future; we are grateful for the robust public discussion and engagement that will help determine the best course of action.

Sincerely,

Katherine Dowson, Executive Director
Friends of Pathways