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Title:

Comments: I strongly object to the proposal to allow e-bikes on the Teton Pass area trails, and to extend the season of e-bike use on the Horsetail Creek and Munger Mountain trails. Not only will approving their use increase conflicts between human trail users, it will increase impacts on wildlife and on soils and vegetation adjacent to the trails.

There's no doubt that many people would like to ride e-bikes on these trails. But that's not a good reason to approve this. Many people would like to do lots of things, but at some point limits have to be recognized. New motorized toys allowing ever easier access to the backcountry are being invented and produced with alarming speed. With the human population growing throughout our region, and ever more demand for backcountry recreation, the Forest Service should be laser-focused on protecting the natural qualities of the land from overuse, not looking for ways to increase use. Slapping pretty words like "sustainable" and "responsible" on our ever-expanding recreational footprint doesn't make it any of those things.

I am fast approaching inclusion in one of the categories of users you cite as benefitting from this proposal, "older people who can no longer use a regular mountain bike." So I should think this is a dandy idea, right? But here's why I think it's a terrible idea: most older "users" I see out on the trails are on foot, enjoying the surroundings at a hiker's pace. Ever since mountain biking became a thing, anyone on foot can no longer relax on any trail that is open to bikes—we have to be ready to leap off the trail at a second's notice if a bike comes tearing down the trail. This has dramatically altered hikers' experience of all the trails near Wilson and Jackson, even those in the Palisades Wilderness Study Area that never should have been opened to either mechanized or motorized transport. So now, let's add in e-bikes speeding not only downhill but uphill as well!

I think that, if approved, this proposal will dramatically increase user conflicts, not just between bikers and hikers, but between e-bikers going uphill and e-bikers going downhill on the same trail, not to mention regular mountain bikers. The potential for accidents at high speed will certainly increase.

And the notion that somehow one class of e-bikes will be allowed, while the other classes (which your scoping statement admits are "difficult to determine by appearance alone and are constantly changing") would be excluded is easy to say on paper, but how would it be enforced? Does the Forest Service have funding for rangers mounted on e-bikes to go out and chase down riders on the wrong bikes? The permit system might have some success, but isn't it likely that vacationers from Bozeman or Salt Lake will drive directly to the trailhead, unload their e-bikes, and go riding, without bothering to pay a visit to a local shop to be forced to watch an educational video and buy a permit?

And how will you prevent e-bikers from poaching the trails in the Palisades WSA that are now used (in theory) just by non-motorized bikes? Out-of-town e-bikers won't necessarily understand what the WSA is or why e-bikes aren't allowed in the WSA. How tempting will it be for an e-biker who has cruised up the Old Pass Road to turn left at the top and ride out along Elle Ridge or down one of the bike paths in the WSA? It seems to me this is a slippery slope and soon you will be issuing another scoping statement proposing to open the WSA to e-bikes because it's impossible to keep them out, thus putting another nail in the possibility of the WSA ever becoming designated Wilderness. Opening the WSA to motorized bikes (or any other motorized transport like e-snowboards) would clearly violate the Wyoming Wilderness Act of 1984, a law that the Forest Service is required to follow.

With regard to wildlife, a person on an e-bike can go much further in a unit of time than a person on a regular mountain bike—so the numbers of people getting to the more remote reaches of the trail system will increase, with

corresponding disturbance of whatever wildlife hasn't already been driven out of their habitat by regular bikers. And eventually, if user conflicts increase as expected, surely proposals will be put forth for building more trails so users can be separated (or the bikers will go ahead on their own and "pioneer" new trails as they've done in the past, counting on the Forest Service to add them to the official system trails)-and each new trail will eat up more wildlife habitat. Numerous studies have shown that recreational trails can lead to significant habitat reduction, compression, and fragmentation, and ultimately to severe declines in wildlife populations (see, for just one example, Desjardin, L., Gallensky, A., and Thrasher, T.J., "Recreational Disturbance Modeling of Elk Habitat in Medicine Bow-Routt National Forests," Published by Keep Routt Wild, February 2022, <https://static1.squarespace.com/static/5bc0c8a0fb18203af9535def/t/62111a56e0a8163324b2f842/1645288026430/Recreational+Disturbance+of+Habitat+in+Medicine+Bow+Routt+National+Forests.pdf> ).

Finally, the proposal to decrease the seasonal restrictions on e-bike use on the Munger Mountain and Horsetail Creek areas should be taken off the table. Again, impacts on wildlife are a concern, and so are impacts on the trails themselves. In the fall season, when rain and snow are frequent, bikes going out on wet trails contribute significantly to erosion, both on the trails and near them, by swerving off trail to avoid puddles or ice. E-bikes are motorized vehicles and there's no reason they shouldn't be subject to the same seasonal restrictions as other motorized vehicles.

I urge you to nip this terrible proposal in the bud, now. Take a stand for wildlife, for the natural world, for human-powered recreation. Otherwise you're opening a Pandora's box, leading to ever more intense conflict, ever scarcer wildlife, and ever more difficult management decisions. Just because a well-funded pro-motorized recreation group comes to you pushing this idea doesn't mean you have to go along with it. Say no.

Ann Harvey  
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