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Comments: On behalf of Friends of Pathways (FOP), a Teton County nonprofit organization that champions pathways, trails, bike lanes and sidewalks to promote sustainable transportation and healthy recreation in Jackson Hole, I am writing in support of Alternative 1 of the E-Bike Use Designation on Select Jackson Area Trails #64890. Friends of Pathways has worked with the Bridger-Teton National Forest (BTNF) for the last 26 years to provide trail construction, maintenance, ambassador outreach, and data collection across 130 miles of the front-country of the BTNF. 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. FOP values our partnership with the BTNF and recognizes the challenges of providing space and access on the Forest trail system for a growing number of people and uses.

Friends of Pathways originally supported the BTNF's first draft scoping proposal to open 27.5 miles of trails on Teton Pass to eMTB use. We suggested that the BTNF proceed with caution and establish specific metrics to determine if the program was compatible, i.e. monitor usage numbers, continue to collect public feedback, and have more of a physical presence on site. Our decision was also predicated on the BTNF developing and implementing a robust public education and enforcement plan, which we deemed essential to the success of the proposed new program on Teton Pass. Given current restraints on BTNF capacity, including public education, manpower and enforcement limitations, it is clear to FOP that pivoting to a different strategy for accommodating eMTBs is in the current best interest of the BTNF and the public. We do believe that the conversation regarding eMTBs use will continue, and that the new Alternative 1 is most likely a stop-gap measure.

The proposed Alternative 1 will be much easier for the public to understand and the BTNF to manage. In addition, Alternative 1 provides additional benefits:

1. Alternative 1 adds more miles of multiple use trails across a wide range of locations and helps spread out users across the busy front country trail system. Shadow Mountain has existing trails that can be connected to campsites spurs to create a cohesive and very enjoyable single-track trail system for locals and visitors. Additional trail mileage in Mosquito Creek will invite a wider range of users and add value to this well-built network. New trail mileage at Swinging Bridge and along the Johnny Counts Road will enhance the South Jackson trail system all the way to Astoria Hot Springs.
2. Alternative 1 allows e-bikes on the Old Pass Road and most of the downhill specific trails. The Old Pass Road ties into the paved pathway network. It makes sense to allow e-bike use. The downhill specific trails are managed as bicycle and downhill only, which significantly reduces the speed variability and user conflict issues that are more relevant on cross-country trails. In addition, Alternative 1 creates an opportunity to ride the downhill trails without having to shuttle a vehicle up the highway.
3. Alternative 1 extends the seasons from June 1 to November 30, which allows for more use during the snow free months and more closely matches the seasons for other MVUM areas. In our history with trail management on the BTNF, trails tend to police themselves in the spring and fall as conditions dictate when use is possible.
4. Alternative 1 simplifies the education and enforcement issue by focusing eMTB growth in areas where they are already allowed or in locations with less probability for user conflict (Johnny Counts Road, Old Pass Road and most downhill specific trails).

We recognize that the growing use and popularity of eMTBs is a topic that elicits many opinions and applaud the BTNF for dedicating significant outreach and planning resources to this process. We encourage the BTNF to

monitor the outcomes of Alternative 1 and continue to work with eMTB advocates to assess whether this new plan is addressing the needs of this growing sector of the recreational community.