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First name: Carly-Ann
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Organization: Wyoming State Parks, Historic Sites, Trails, and Outdoor Recreation
Title: Planning Manager
Comments: Dear Ranger Stiles,

Thank you for formulating a plan to manage e-bikes in the Jackson area; we appreciate the opportunity to provide comments on E-bike Use Designation on Select Jackson Area Trails. E-bikes are a growing user group; being proactive in their management is essential for mitigating current and future issues. We would like to offer our support for the Proposed Alternative and comments regarding e-bike management.

Wyoming State Parks and Cultural Resources strives to provide memorable recreational, cultural, and educational experiences that improve communities and enrich lives. The Division of State Parks, Historic Sites, and Trails, includes the Wyoming Office of Outdoor Recreation and the Wyoming State Trails Program. Wyoming State Parks protects and enhances the natural and cultural environment by providing enjoyable, educational, and inspiring experiences for present and future generations. The Wyoming Office of Outdoor Recreation aims to diversify Wyoming's economy by expanding, enhancing, and promoting responsible recreational opportunities through collaboration, outreach, and coordination with stakeholders, landowners, private industry, and public officials. The Wyoming State Trails Program provides motorized and non-motorized recreation opportunities while promoting safe and responsible recreation through the administration of the snowmobile, off-road vehicle, and outdoor recreation programs by partnering with land management agencies to maintain, create, and provide funding, labor and equipment for trail management.

We appreciate that this assessment looks towards a changing future regarding e-bikes and considers the problems which make this such a difficult issue to manage. At Wyoming State Parks we manage some non-motorized trails for Type 1 e-bike use, prioritizing objectives similar to those stated in the USFS assessment: preserving a positive user experience, minimizing and addressing safety concerns, and recognizing that enforcement of e-bike regulations is difficult. This seems to be an accepted standard in other places, as well.

The Proposed Alternative best aligns with objectives of user experience, safety, and enforceability. The Proposed Alternative recognizes protecting and enhancing user experience by leaving some areas as truly non-motorized. However, it also provides e-bikes multiple options for an enjoyable singletrack experience. It minimizes safety concerns by limiting e-bikes from certain areas where pedestrian and equestrian traffic is more common. By focusing most e-bike use to areas that already allow motorized traffic, the Proposed Alternative also limits some of the enforcement required to distinguish between different classes of e-bikes.

On the topic of safety and enforcement, we feel that the Proposed Alternative could be improved if it limited the e-bike usage south of Teton Pass to Type 1 only. The trails in that area were designed to be gravity powered and introducing heavier, throttle-powered bikes as their increased downhill speeds could lead to trail degradation and user conflicts. As mentioned in the studies within the assessment, Type 1 e-bikes do not move faster downhill and may even be slower. Type 3 bikes, however, have a greater max speed (28 mph vs 20 mph) which can be controlled by throttle independently of the pedals. Opening up the doors for throttle-powered bikes on non-motorized trails may also encourage users to push the limits of their bike class or even use higher powered bikes without pedals. Thus, it may be easier to draw the line at having a throttle for user safety, enforcement logistics, and trail maintenance. Wyoming State Parks only allows Type 1 e-bikes on non-motorized trails.

Proposed Alternative 1 will allow all classes of e-bike on trail systems that are already open to motorized use; this won't require any additional enforcement of e-bike classes. However, due to myriad options for power output and throttle types, the line between some types of e-bikes and traditional (or electric) motorcycles is already blurred. The distinction between the two will only become more questionable as technology evolves. For these reasons

we feel that e-bike users should be required to purchase an OHV sticker to ride on motorized trail systems. Fees from OHV registration support trail construction and maintenance. No matter what is decided on the requirements, we would strongly suggest consistency of application and enforcement of stickers across all districts of the Bridger Teton National Forest.

We appreciate that the Bridger Teton is addressing these concerns as they are time sensitive and impacting resources that are well-used and loved. It will be important that the decisions and policy set here are signed properly on the ground, are applied and enforced consistently, and that they are considered during the larger Bridger Teton Forest Planning process and any future Travel Management planning.

We would be happy to answer any questions or provide policy documents from Wyoming State Parks, the Office of Outdoor Recreation, or the Wyoming State Trails program. Thank you again for your attention to the issue of e-bikes on non-motorized trails in the Bridger-Teton National Forest.

Sincerely,

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