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Organization:

Title:

Comments:

Please accept my input on the eMTB use designation proposal. This will not be heavily edited or proofread as getting it done is a higher priority for me, so please excuse any bad grammar and ramblings. I had a phone conversation with Tim Farris and will refer to some of that discussion.

I have several concerns about the project as proposed.

First and foremost, enforcement is currently non-existent and a more complicated goal of detecting a specific class of eMTBs seems to not be rooted in reality. I would not support this proposal without identified funds and resources at the same time to cover permitting and enforcement. That enforcement should include contiguous areas that won't allow eMTBs. Allowing eMTBs in some areas will only encourage more use in the areas where they are prohibited. The vast majority of users are well-intentioned but there are also users who have blatant disrespect of any boundaries and they will only be more bold if there is not enforcement.

Second, it seems there is no really good data to go on and some of the arguments for expanding use are based on anecdotes and imagined scenarios. For example, there are a lot of older people that can't ride an acoustic MTB, and probably for good reason. There are also a lot of older people that can't hike up Glory to ski. I don't think that fact justifies a decision one way or the other. There are people who ride eMTBs and want more single track terrain, pure and simple. I wish it could be left at that.

Third, the number of miles of trails and what is and isn't available to various user groups, either by total mileage or percentage, is very hard to understand. As with most numbers, they could be sliced and diced many ways. This should be more precisely quantified with additional data. I looked at the MVUM but that would take significant time to distill.

Fourth, while I realize this is a Jackson District proposal, there are contiguous areas that should be considered and most certainly the permit holder areas, such as the ski resorts. Specifically Jackson Hole Mountain Resort should be in the mix because they are building out a lot of MTB infrastructure and that is the Jackson District of the BT. If you are trying to answer the question "Where do we tell eMTBs they can go?", certainly JHMR would have to be on the list as one of those areas. Can Snow King add eMTB access to any trails they put in as a permit holder?

Fifth, opening trails to eMTBs is potentially a slippery slope that will be hard to put boundaries around. It feels disingenuous to think eMTBs riding up the old pass road won't then continue. I see that Crater, Mt Elly and Blacks are not on the list. I assume those are in the Wilderness Study Area but aren't some of the other downhill trails? If the case is being made that eMTBs have an equal impact to acoustic MTBs then why exclude Wilderness Study Areas? Those may be the types of trails that make MORE sense for eMTBs. The beauty of eMTBs is they could actually handle trails not specifically designed for rideable grades. Are there none out there that might be useful to expand access for eMTBs? Cabin/Dog loop is one example that comes to mind. Decide whether acoustic MTBs and Class I eMTBs are equivalent or not. If not, why? Tim noted they may be blended into one bike in the future, so you take that as fact, plan accordingly.

Another concern is none of us know for sure where the technology of eMTBs will go so I hope that any plan can be re-evaluated frequently.

As far as the pros of the proposal I appreciate the USFS's interest in accommodating user groups and working to make this a civil process. The separated use trails on Teton Pass and elsewhere are a huge success as a result of the USFS trying to be sensitive to different user groups. Collecting data and getting some experience with how this will work makes sense. The use of eMTBs will continue to grow and it is wonderful that they already have so many miles of trails to ride, which shouldn't get lost in this conversation.

Given all my concerns, I hesitate to support expanded access. At the same time, I understand that eMTBs aren't going away and want more single track to ride. If you decide on a pilot program to expand access, my vote for today would be to start with extending the season on the 2 existing eMTB areas and then include only the south side of Teton Pass, and look at including Crater, Mt Elly and Blacks. This would allow for a season to set up permitting, enforcing and feedback structures.

Respectfully,

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