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Title:

Comments: Todd Stiles October 30, 2023

District Ranger

Bridger-Teton Nat. Forest

Re: E-BIKE USE DESIGNATION ON SELECT JACKSON AREA TRAILS

Transmitted via USFS online portal

Dear Mr. Stiles,

Thank you for this opportunity to submit comments regarding the proposal to allow e-bikes on select trails within the Jackson Ranger District. These comments are made on behalf of myself only.

I am opposed to opening more trails to e-bikes.

#### INTRODUCTION

Indeed, e-bikes are a very popular and fast-growing recreational activity with "the potential to increase user conflicts and create safety issues."

Last year, a friend and I rode our e-bikes on the County path between Wilson and the Old Pass Road parking lot. On the way we were nearly forced off the path due to a group of mountain bikers coming down the path at a very high rate of speed and several were riding side-by-side- all the time shouting and seeming to care little about us. My point is that by design, bikers tend for top speed while going downhill. Add e-bikes to the trails and we have the real possibility to have more bikers going too fast not just downhill, but now both up and down hills. It matters little that signage makes it clear that bikers yield to hikers, it rarely works that way. Increasing the number of trails open for e-bikes will make the trails less safe for all user groups, not just because of the miles of additional trails, but because the number of bikers will also increase. When that happens and the user experience begins to wane, will the Forest open new routes to spread them out? When will the Forest say "stop"? When does this e-bike expansion become unsustainable and what metric will be used to decide when that point is reached? This decision must be made with a long view, not just to satisfy the needs of today's select user group.

As outlined in the CURRENT CONDITION section of this document, the Jackson District has 101 miles of "native surface trails" open to e-bikes accounting for 15% of all summer, native surface trails (744 miles). Adding the 27.5 miles of new e-bike use trails as proposed would bring the total to 128.5 miles, or 17.2% of all native surface trail in the District. And that is just one of the six Districts within the Forest. (There over 60,000 miles of trails within the entire USFS system currently open to e-bikes. That amounts to 2.4 times around planet earth. This does not include e-bike trails on BLM lands. Is that not enough?)

#### SCOPING COMMENTS

\*The Forest's document mentions that allowing e-bike use on designated trails might alleviate parking congestions at trail heads. This assertion must be analyzed in the Environmental Assessment. Opening new trails to a new use will bring new users. How does that alleviate current parking congestion?

\*Nowhere within the Scoping document does it mention potential impacts to wildlife. There is a fast-growing body of evidence detailing wildlife impacts from hikers, horseback riders, bikers, e-bikers (usually identified as a faster form of use) and dirt bikers. This analysis must include birds, small mammals, invertebrates and vegetation as well as game specie and meso- and large carnivores.

\*The Scoping document mentions that engaging with e-bikers and implementing a permit system may help with education and enforcement. This vague and qualified statement needs to be fully explained. And how will enforcement be carried out? Mountain biking is common in the nearby Palisades Wilderness Study area although mechanical transport is denied under the 1964 Wilderness Act. If we can't enforce uses in a WSA, how will the Forest enforce e-bike use?

\*I support the implementation of an e-bike permit system with a visible identifying number.

\*I support the clear statements that no new e-bike trails will be constructed and e-bikes are not being proposed for Wilderness, Wilderness Study Areas (WSA), and sensitive wildlife zones.

\*The EA needs to demonstrate that extending the user season on the Horsetail trail from September 9 to December 1 will not impact wildlife use and seasonal movements and hunter activities. The assertion that e-bikes are quieter than motorcycles and hence will have less impact on elk has to be demonstrated and not just stated because it does not take into consideration that the extended season will likely generate more users and users moving faster than traditional mountain bikers- all during the fall migration season.

\*The proposal to have the lower Munger Mountain trail open to e-bikes year-round needs to be analyzed for potential impacts to wintering wildlife.

In conclusion, this proposal should not be decided in the vacuum encircling the identified trails, but in relation to the lands surrounding this area in question. A few miles to the north is the seemingly ever-expanding Jackson Hole Mountain Resort with impacts immediately within the lease area and extending well beyond with its expanding winter use activities. To the south is highway 22 that for hours every day is nothing more than a moving wall of vehicles. And immediately south of the highway is a landscape experiencing very heavy and growing year-round recreation use. How will this proposal, were it to proceed, impact the health, the ecological integrity and the very function of the larger, surrounding landscape? The area available for native wildlife is shrinking as recreational uses expand. At what point will the area between Grand Teton National Park and the Palisades WSA be given over to humans? When will these lands no longer function as seasonal habitat- activities no longer sustainable? At what point will the land no longer provide secure movement and dispersal corridors for rare species such as the wolverine, lynx and grizzly bear? When will we make land use decisions on the basis of how they might impact larger landscapes and not just the small project bubble?

The Jackson ranger District, and the entire Bridger-Teton National Forest has no overriding obligation to meet every desired use at ever increasing levels. It does, however have an obligation to protect its resources- the land and all its native species whose existence depends on an intact and functioning ecosystem.

Thank you for your consideration and your dedication to a better national forest.

Franz Camenzind PhD

/ Signed /

Jackson, Wyoming