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Organization:

Title:

Comments: My perspective is as a Wilson resident who hikes the Teton Pass area and Munger on a regular basis. I am a botanist and enjoy the birds and wildlife as well. Periodically I lead informal, free, flower hikes for groups of 15-20 along Teton Pass and Wally's World.

Over all, I understand there is a demand for more bike/e-bike use, and the alternatives are trying to address this reality. The idea of developing longer trail options throughout the valley is commendable, keeping in mind issues of oversight and wildlife impacts. Also, it is only likely to increase demand by attracting more people to Jackson Hole for this recreational purpose, not for wildlife.

The stated staff commitments for ebike education, specific training for Law Enforcement, and partnerships are absolutely necessary before next phases go forth. I am concerned this will be very difficult in the foreseeable future.

Also concerning enforcement, how will ebikes be differentiated from mountain bikes and ebikes separated from evolving off-road motorcycles now and into the future? Without a mechanism to remotely sense (vs. looking at the rider's posture) the difference between human-propelled and motor-assisted wheeled vehicles the plan is opening miles of forest lands to motorized vehicles with impacts on trail quality, wildlife, and user experience. USFS should proceed extremely conservatively in opening up more trails to ebikes or any bikes.

Having said that, the plan gives much too little attention to other users: hikers and equestrians of all ages who have been the traditional users and are likely to be deterred from using the trails if there is a significant increase in bike use. We will be displaced.

Wildlife: Too little attention is given to the collateral impacts of faster, speedier bikers/e-bikers on wildlife that is not technically "endangered". Admitted in the DEA is that fast frequent wheeled use has displaced wildlife. That is the key argument for stating that there won't be much new wildlife impact as there is little new trail being built for use by bikers. Wildlife has already been displaced. In other words, bikes do displace wildlife.

The DEA throughout does not address the quality of the hiker experience sufficiently. It acknowledges that more frequent (dense) use by bikers can cause anxiety and even fear when walkers are surprised by bikers, but this is given short shrift (DEA p. 24). At age 72 I am often walking with other older people. As my hearing and reflexes are still good, I can at least hear someone coming before my friends do. I often yell at the rider coming down who is necessarily looking at the trail. My yell causes them to look up. Many riders do then slow down, but certainly not all. If given time, I can usually step off the trail to let bikers pass as I know how not to step on the plants. Some of my older friends have a harder time doing so. Mountain bikers coming up are slower, but ebikes will be faster, another concern. In any case, the encounter upsets the peacefulness of the hike. It is natural instinct to respond with fear to something fast and large suddenly speeding your way.

Older people, people of all ages, on their own two feet should be given as much deference if not more than those who wish to use an expensive ebike to go on trails. The etiquette encourages this, but in practice the sheer numbers and speed of bikers are not taken in account.

Furthermore, there is a relatively small percentage of the mileage of trails that is exclusively for pedestrians and horses: only about 1/3 of trails in the Old Pass area (Boulder Trail, History Trail, and trails to Ski Lake and Phillips Canyon-Black Canyon Trail is already too busy with bikes) and none in the Munger area. Again, this is an increasing bias: bikes get to go on many trails exclusively (for good safety reasons), and also on mixed-use trails.

Hikers and equestrians have fewer areas dedicated to them. It's hard to get away from bikes! And to be safe.

Trails that are heavily used by bikes are also often difficult to hike because the trail surface becomes channeled. For instance, I hiked Black Canyon trail years ago and it was so channeled, and the bikers so fast, I do not hike it now.

The other impact on the hiking experience that is not acknowledged is the reduction of the presence of wildlife. The DEA (p. 36) states that birds and bats are affected by ebike noise within 45' to 231' (on both sides) feet of the trail. "Most species" are affected within 75'; It also notes sounds reduce habitat effectiveness, breeding and fledgling breeding success. That is fewer birds to hear or see. Animals may go elsewhere safely but those of us who are quietly hiking for nature don't get to see or hear wildlife around us-it is not there anymore. This is a huge reduction in the hiking experience for many of us. Jackson Hole is very different than Boulder, Colorado, in the richness of biodiversity and the very special opportunity to share the space with them. This is why many of us live here rather than in Boulder, Park City, or the like.

Trail condition and invasive exotics: I appreciate the skilled workmanship that goes into the trail system. For instance, the trail up Big Munger was greatly improved a few years ago. However, despite the guidelines for trail building and exotic invasive mitigation, I am concerned that the additional impacts of compaction and erosion from people stepping to the side to let bikes through or bikes going around pedestrians will increase the opportunity for weeds to spread, not "remain low". The DEA notes (pp. 37-38) that there will be "reduced vegetation growth". It is true native vegetation has a hard time growing on disturbed ground, it does not mention the extra ease that invasive exotics have in spreading on such ground. The DEA indicated that the effects will only be within "a few meters" and will remain "localized". This is often not the case. Once an area is infested, weeds will go for miles-think of cheat grass. The idea that bicyclists will clean their bikes before they take to the trail again is specious. Also at least some of bikers travel with their furry dogs who also harbor weed seeds. As stated, the ease of ebikes increases the distance that riders will go which increases the scope of potential weed dispersal and increases the difficulty to control them. Weeds have evolved to benefit from disturbance, and budgets are too tight to monitor and control weeds in such an expanded territory.

Comments on individual options:

No Action option: Agree that no option is insufficient to address the increase in bike/ebike use and uses by hiker and equestrians.

Proposal Action - Teton Pass Area: (Teton Pass Area: Class 1 ebikes allowed on existing bike trails both north and south of pass).

Enforcement: I agree with the DEA that just designating Class 1 ebikes use is not practical due to difficulty of permitting and discerning between the changing classes; therefore, where ebikes are to be allowed, include all classes of ebikes for this set of trails.

South of Pass: I strongly concur and appreciate not allowing ebikes within the Palisades WMA. The wilderness status needs to be protected. Also, the first part of the trail out to Mt. Ely is particularly narrow on steep slopes. It is already difficult to hike and accommodate bikes safely. The Proposal Action allows ebikes on trails that are already close to the highway and thus additional use will minimally impact wildlife.

North of Pass: I understand the idea is to provide biker/e-bikers more specifically designed, longer, interesting trails to accommodate and divert biker use (hopefully) from the more sensitive areas. However, adding ebike use will likely add overall number of riders, I don't see that most existing mountain bikers will "switch" their use to ebikes and the numbers will stay approximately the same. As noted, e-bikers will be more apt to take the longer trails also adding to density on trails. Additional bikers on trails north of the pass will deter hikers and equestrians

from using the trails at all especially the 4-mile trail coming up from Fish Creek. Horses will be displaced from this approach and effectively lose access to Phillips Ridge.

Parking will continue to be an issue with Phillips Ledge access point. The parking across the highway is dangerous. Parking from Fish Creek Road is also very limited for those going from that access point. There is more parking at Trail Creek and it looks like this could be expanded, unlike the other key access points.

I suggest two alterations to the Proposed Action:

South of Pass: Ideally, I would like to see ebikes not allowed on Old Pass Road. This is the one broad stretch trail accessed from the Trail Creek area where locals often walk with their dogs, talking with friends or with family of various ages-they usually walk side-by-side to hear each other, instead of being single file as needed on other trails; dogs meander accordingly in full sight. As noted, the destination is often Crater Lake, which is very satisfying achievement.

Adding ebike use would very much affect the experience by hikers/walkers who would have to be more aware of e-bikers coming and going. With the wider paved area, it is likely that new ebikes can and will go faster uphill than the quoted studies indicate. Also, with the wide sight-lines, they will likely go fast downhill. Being a "slow zone" will not be of significant deterrent, I fear. The increased bicycle numbers and speed will require walkers to be more vigilant, and have less fun, on their walk.

Furthermore, additional numbers up around Crater Lake will disturb the tranquility and wildlife. I have seen beaver (not sure if still there, as one was dead), moose, and various birds-including dippers--there on quiet days. Young black bears and even a grizzly were in the area last summer, not to mention moose. Also, bikers already have a parallel trail near the highway (although currently downhill only-could it be two ways)? This should be a scenic walk for local community folks, not a throughway for ebikes.

Perhaps to mitigate this problem, although I admit it could increase more bikes on Old Path Road, would be to close the parallel Crater Lake Trail to bikes altogether and have it as a walk/horse area. This would provide a restricted hiker/horse loop: History Trail and Crater Lake Trail. It would also provide more latitude (and safety for all) regarding moose and bears in the area. I would certainly close Crater Lake Trail to bikes/ebikes if ebikes are allowed on Old Pass Road.

North of the Pass: I appreciate the plan keeping the trail to Ski Lake and to Phillips Pass free of bikes. This is another highly used path by locals, and the trail is often narrow along steep slopes, often with flowers.

I don't know much about the bike trails at all, so won't comment.

Close off the short stretch of trail to bikes and ebikes that runs northwest of the junction of the Arrow Trail and Phillips Canyon Trail. (On current BTNP Old Pass trail maps this is shown as hike and horse only). This would reduce the temptation for bikes to continue up into basin and on to Phillips Ridge. This basin is an extraordinary attraction in August due to the flowers but the trail is very narrow. The proximity of the plants is wonderful and would be compromised by widening the trail deliberately or by too many users. Also, moose and calves are often in this area as well as nesting birds.

Have limits to the time of year for bikes and ebikes - June 15-Oct 30th?

Proposal Action - Munger: (year-round bike/ebike use on lower Munger, and extended time on Big Munger to December 1)

Do not allow year-round use for bikes and/or ebikes on lower Munger. And do not extend bike and dirt bike use

up Big Munger to December 1. These areas as noted in the EA (p. 39) are wildlife rich areas with wintering, migratory, and calving territory for elk, mule deer, moose. I have seen fresh bear tracks, moose tracks, and large canine tracks in early April on the Rock Creek Trail, as well as sandhill cranes feeding. There are the nesting raptors-owls, hawks, eagles--as noted in the DEA that would be impacted over the long term. Conflicts with hunters is also a concern.

Increased use/access will likely cause increased soil impacts on all the trails but particularly the Wally's World knoll and summit of Big Munger where the soils are shallow. Invasive species are likely to benefit. They will spread easily due to disturbance, topography, and wind. While there may be able to control cheat grass on Wally's World, top of Big Munger is a much farther area for control crews to reach...this poses a fire hazard. Invasive exotics will affect the natural scenic value as well.

What has not been considered is the proposed trail connection to the leased School Trust parcel to the north and how more activity will affect parking and invasives (there are many where the cattle have been).

Alternate 1 - Old Pass Area (Exclusively mountain bike trails on north side, both ebike and mtn bikes outside WMA on south side, including Old Pass Rd. open times unclear)

North of the Pass: I support this option to have no e-bikes north of the Pass - It provides avid mountain bikers a range of trails without the complication of e-bikes. The parking areas from Fish Creek and Highway 22 are already tight. Adding another use will only compound the issue.

Close off the short stretch of trail to bikes that runs northwest of the junction of the Arrow Trail and Phillips Canyon Trail. (On current trail maps this is shown as hike and horse only). This would reduce the temptation for bikes to continue up into basin and on to Phillips Ridge.

South of the Pass: I strongly support allowing e-bikes on the existing bike trails outside the Wilderness Study Area. Ideally, mountain bikes would not be allowed in the WSA but the horse is out of the barn on this one. The first part of the trail to Mt Ely is particularly narrow along a very steep slope which is covered in wildflowers in summer. Many people hike here to see the flowers, including visitors who come over the pass and see the Howdy sign and the flowers galore. This is a hikers' dream in summer.

As it is, it is very difficult for hikers and bikers to pass. Hikers need to step off and lean into the hill to be safe. The first part of the trail to the telecommunications tower has a suite of unusual small plants...fortunately most bikers use the road - a sign should encourage this.

Enforcement: I understand the complications of differentiating between e-bikes and mountain bikes going into the WMA, however, I would think that a detection device for electric motors vs. non-motor vehicles can/should be invented. If there is no device, then wait on ebikes on the south side.

Reduce the open dates to July 1? to Oct 30, not Nov. 30. There is significant of moose and bear activity in the area as animals, often young naïve ones, are fattening up. Over all mountain bike use will be lower (demand less) due to the "off season"--many people are out of town--which also makes more intermittent use all the more startling to animals. Bikers can give back to wildlife for a change.

Reserve Old Pass Road for bikes and hikers only, no e-bikes (see above). I know there is a "go slow" zone, but I am concerned that this will not be adhered to. Or at least close of Crater Lake Trail to all bikes.

Alternative 1 - Munger

Yes, keep Big Munger dirt bike opening from July 1 and Sept 9 to reduce wildlife impacts and include ebikes in

this closure. (see above)

Low Munger: Restrict dirt bikes as currently allowed: between July 1 - Sept 9. These vehicles are particularly noisy and disruptive to wildlife, hikers, equestrians-I would include ebikes in this restriction to be consistent with dirt bikes. Ideally restrict all bikes to between July 1 and Sept 9, especially as one can't tell the difference for enforcement. As already noted, this area is particularly sensitive wildlife habitat, and many people enjoy hiking. Horses in the past have also used this area-notably there are horses kept in the area. Mountain bikers do use the area frequently, but so far have been limited by the effort required and also likely due to the limited thrill of the trails vs. those up on Teton Pass.

Note that all the trails in this area are designated mixed use-none are dedicated horse/hike. The DEA correctly states the increase in hiker use by those who come to enjoy the flowers in June and in September to October for aspen color. Ideally, allow only hikers and horses on the trails to Wally World around Tuscan Ridge for a peaceful, nature experience. Perhaps place a bike rack at the junction of Poison Creek and Wally's World trail and encourage folks to walk a short way to enjoy the flowers.

Or limit the time for bikes: limits to the time of year for bikes and ebikes - June 15-Oct 30th? similar what I propose for Teton Pass for consistency. This will also protect moist trails. Also having many trails in this area closed till summer would encourage bikers to discover other trails that may be more suitable.

Note on new trails elsewhere: The intention of offering new trails elsewhere is positive, but only if planners are very careful about wildlife. Most notable is the acknowledged wildlife impacts of new trail construction and enhancement of illegal "non-system" trail up on Shadow Mountain. Wildlife impacts on Mosquito Creek are also noted. We have fragmented much habitat already in existing bike zones. While the wildlife impacts are deemed to be relatively low overall in the "comprehensive area" of the DEA, specific areas are in fact significantly impacted. We keep enhancing trails which increases use and demand for more, and more of it is motorized. "Recreation" appears to be defined as active, machine-driven activity, which is often fast. It caters to "individual thrill" not to slow contemplative nature appreciation and respect. Here in the Greater Yellowstone Ecosystem, we should be enhancing the opportunities to see and enjoy our unique wildlife vs. replicating opportunities that are found in many more urbanized communities. People can bike in many other parts of the country, but there are few places to quietly enjoy our remarkable wildlife.

In Sum:

General:

- *Add more weight to user impacts on wildlife and invasive exotics.
- *Provide more weight to the hikers' experience by reducing ebike use on some trails, and including more dedicated horse/hike trails with particularly emphasis on wildlife habitat. Nature watching on two feet is recreation. The DEA has an ebike bias.
- *Treat all ebike classes the same.
- *Determine method to more readily separate electric motors from non-electric bikes to improve enforcement before expanding bike/ebike options.

Merge options of Proposed Action and Alternative 1:

Teton Pass:

- *Allow ebikes on existing bike trails south of Teton Pass and outside of the WMA.
- *North of the pass keep the bike trail use for mountain bikes only. More bikes will deter hiker/horse use on some trails.
- *Shorten bike/ebike access times to Oct 30 to protect wildlife during prewinter feeding.
- *Close of Crater Lake Trail to bikes, so it is a dedicated hike/horse trail.

Munger:

*Do not allow ebikes/bikes year-round on lower Munger to protect wildlife and trail conditions..

*Do not extend dirt bike dates beyond July 1- Sept 9.

*Restrict mountain bike dates mid-June to Oct 30.

*Close Wally's World and Tuscany Ridge trails to ebikes to allow for more enjoyable hiking with nature appreciation on this loop trail.