

Data Submitted (UTC 11): 2/25/2025 3:53:56 AM

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Comments: A bicycle works mechanically by converting the pedaling force applied by the rider into rotational motion through a chain and gear system, which then turns the rear wheel, propelling the bike forward.

An electric bike works by supplementing the pedaling force applied by the rider using a battery powered motor that adds torque to the chain and gear system, which then turns the rear wheel, propelling the bike forward.

Mechanically there isn't much difference between the way electric mountain bikes and analog bikes work.

Conversely, a dirt bike uses a gasoline engine to power the bike by forcing air and fuel into a combustion chamber. The mixture is ignited, which creates an explosion that pushes down on a piston. This motion rotates the crankshaft, which powers the rear wheel. Furthermore, for the simple purpose of identification, dirt bikes have pegs, not pedals.

People hear the word "motor" and either think of a dirt bike or the 70-pound commuter horrors we see on the pathways carrying three middle-schoolers, all on their iPhones, not pedaling, powered by a throttle.

These false conceptions have severely hampered efforts to expand eMTB use on established mountain bike trails. You wouldn't take your beach cruiser on a single-track mountain bike trail; likewise, you wouldn't take a commuter e-bike on a single-track mountain bike trail. NO ONE is asking to allow eMTBs in Wilderness where mountain bikes are not allowed. As far as noise, the free hub on my friend's fancy XC bike is louder than the motor on my eMTB. The misconceptions of what opening single-track mountain bike trails to eMTB use really entails are far more blown up than the reality of the situation as illustrated in the "Issues Analyzed in Detail" section of the EA.

As stated in the EA, this proposal came out from "the need to be proactive and develop a sustainable long-term plan to provide for quality e-bike opportunities on public lands while also minimizing the effects on other recreationists and natural resources." I've heard arguments against eMTB use stating that it'll simply add more users to our already crowded trails. I believe its shortsighted to think we may be adding a whole other class of users to our trails. An eMTBer is also an analog biker. They can't ride both at the same time. Allowing eMTBs on established mountain bike trails is adding far less users to our trails than a new 1000+ home subdivision, but that's still happening, is it not? I'm not advocating for a free-for-all on our public lands, but I think that this is just another argument against eMTB use that only subsists on false claims and fear with no hard facts behind it.

I digress. Back to the EA...

I believe the best solution to properly fulfill the purpose and need identified in the original proposal is a blend of the Proposed Action and Alternative 1. The No Action alternative doesn't fully address the stated purpose and need and thus should not be considered.

The Proposed Action opens many trails of vary difficulty to eMTBs that are already open to mountain bikes. It provides quality single track riding opportunities in a concentrated area - something mountain bikers seek out.

Alternative 1 doesn't provide for this, unless you count the currently non-existent trails at Shadow Mountain. I don't think we can count on these trails being built in time to satisfy the purpose and need of the original proposal that was identified over 2 years ago.

Relying solely on the current motorized trail system to fulfill the identified purpose and need doesn't cut the mustard either. The trails at Mosquito are purpose built for dirt bikes, not mountain bikes. EMTBers are looking for a traditional mountain bike experience and dirt bike trails don't fit the bill.

There's been a lot of talk about how eMTB use affects other non-motorized user groups, but no talk about how eMTB use affects dirt bikers. EMTBers are looking for a traditional mountain bike experience, as can be experienced in the re-route of the Big Munger trail. The old Big Munger trail posed some fun but not impossible challenges for dirt bikers that no longer exist. Those same challenging sections were hike-a-bike sections for mountain bikes. Now it's a scenic cruise on a dirt bike and a super fun eMTB ride. Making it good for mountain bikes and eMTBs has made Big Munger less interesting for dirt bikers. Munger is also a very busy place for hikers now. I know it's a no-go for more trail additions, which is a bummer because the Munger trail system could be a model for sustainable multi-use recreation - the only one in the BTNF.

The biggest problem I see with the Alternative 1 on its own is the distance between short sections of trail. I'm guessing that the brainchild in this proposal is for the pathway system to connect these short sections of gravel. This doesn't sound interesting to me. I'm not riding from town down to the Swinging Bridge for maybe a mile of single track, then on more pathway and road to Johnny Counts Road to go visit Astoria Hot Springs for a relaxing soak only to wish I had a car to drive me home.

Old Pass Road is a great inclusion into the eMTB circuit, but only allowing eMTBs on the downhill trails is destined to be a problem (unwitting tourists ride up the OPR not knowing the cross-country trails are closed) which will undoubtedly be policed by a cadre of Wilson grandmas. The BTNF is just setting itself up for conflict. We know the WSA is off-limits, so the trails on the north side of the pass are essential to offer eMTBers a cross-country option. Are there dates for mountain bike use on Teton Pass? It doesn't seem fair and again will be difficult to manage dates superficially for eMTBs.

Swinging Bridge - I think the moto-trials area would be a great asset to the moto community. I'm not sure of the value of 1 mile of eMTB trail. For the moto-trials zone, I'd like to see the season start earlier than June 1. Is there a reason the season starts so late? It's a sunny zone so a May 1 opening when all the other moto trails are closed would be nice. I like keeping this area multi-use. It's an area of pretty low value so I don't see it taking off as a hot spot for people to recreate, but it's a good local secret until July when it's hot as hell right there.

In conclusion, if you haven't guessed it by now, yes, I would like to see eMTBs managed the same as mountain bikes, but I understand that's taking a legal leap the BTNF doesn't have the backing to take. The reality is that it's going to become increasingly difficult to distinguish between an analog mountain bike and an eMTB so I hope you can come to a decision that fosters inclusion and doesn't encourage one user group to police another.

Thank you for your time.