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Summary of public comments on Forest Service Proposal to Allow E-MTB use on Select Teton Area Trails

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EXECUTIVE SUMMARY

On September 28th, 2023, the BTFNF released a [Scoping Document](#) outlining its proposal to allow and extend Class 1 e-mountain bike use on some Teton area trails. The proposal includes 28 miles of existing multi-use trails in the Teton Pass area (currently open to hiking, horseback riding, and traditional mountain biking), as well as an extended season for e-bike use in the Horsetail Creek and Munger Mountain areas. Public comments on the proposal were solicited and posted online. Drawing from all submitted comments available online after the closing of the comment period, we analyzed respondents' perspectives. A total of 344 comments were submitted, 316 by individuals and 18 by organizations. Twice as many respondents stated opposition to the proposal than support for it. People stated a diversity of reasons for their perspectives. The most frequently stated reasons against included safety hazard (32%), negative impact to recreation quality (25%), negative impact to wildlife (18%), lack of enforcement (17%), conflicts with walkers (17%), greater congestion at trailheads and on trails (16%), erosion and trail damage (14%), conflicts with traditional cyclists (13%), conflicts with horses and horseback riders (11%), and opening a slippery slope leading to more areas approved for e-MTB use on the Bridger-Teton (10%). The most frequently stated reasons in favor of the proposal included access for elderly and/or inclusion of those with disabilities (18%), lack of evidence that e-MTBs cause greater trail or wildlife impacts (10%), and decreased vehicle traffic and congestion through human-powered uphill shuttles for downhill biking (10%). Some respondents provided general comments on management alternatives and ways to improve the proposal. Given the strong public sentiment and reasoning against the proposal provided in public comments, the Teton Backcountry Alliance strongly encourages the Bridger-Teton National Forest to shelve the proposal, and instead initiate a comprehensive recreation planning process to ensure a sustainable future for Teton Pass and the surrounding area.

For more information about this report, email info@tetonbackcountryalliance.org. For more information about the proposal, contact the Bridger-Teton National Forest.

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ABOUT THIS REPORT

On September 28th, 2023, the BTNF released a [Scoping Document](#) outlining its proposal to allow and extend Class 1 e-mountain bike use on some Teton area trails. The proposal includes 28 miles of existing multi-use trails in the Teton Pass area (currently open to hiking, horseback riding, and traditional mountain biking), as well as an extended season for e-bike use in the Horsetail Creek and Munger Mountain areas. Public comments on the proposal were solicited and posted online. Drawing from all submitted comments available online after the closing of the comment period, we analyzed respondents' perspectives. In our analysis we asked:

1. How many responded and who were they?
2. How many respondents stated opposition, how many stated support, and how many expressed other opinions with regards to the proposal?
3. Which stakeholder organizations/groups expressed opposition and which expressed support?
4. What arguments were cited against and for the proposal?
5. What management topics and other suggestions were mentioned?

METHODS

After the conclusion of the public comment window, public comments were available on the BTNF website for public access. These commenters were categorized into "FOR", "AGAINST", and "OTHER". The frequency of reasons for and against were quantified. Other management topics mentioned by the public were listed, including suggestions as to how the BTNF could improve the proposal.

FINDINGS

1. **Question 1:** *How many responded and who were they?*

334 comments were submitted, (95%) by individuals and (5%) by organizations. It is possible that some responses were sent directly to staff people at the BTNF, and not posted.

The number of respondents is relatively high when compared to other recent BTNF proposals open to public comment, which suggests that the question of allowing e-bikes is important to the public.

- Curtis Canyon Road and Campground Project (Scoping Document released January 31, 2023): 32 total comments
- Jackson Hole Mountain Resort Recreation Enhancements Projects for 2023 (Scoping Document released July 1, 2023): 54 total comments
- Snow King Mountain Resort On-Mountain Improvements (Scoping Document released August 3, 2018): 440 comments

Question 2: How many respondents stated support, how many stated opposition, and how many expressed other opinions with regards to the proposal?

- AGAINST the proposal: n=205 (61%)
- FOR the proposal n=107 (32%)
- OTHER: n=22 (7%)
 - “OTHER” comments mainly focused on management concerns. Some took an academic approach to their comments by discussing the proposal’s impacts and benefits. In some cases, the respondent’s opinion was unclear or the respondent seemed indecisive.

Question 3: Which stakeholder organizations/groups expressed opposition and which expressed support?

- AGAINST: 7 organizations/groups (39%)
 1. Wyoming Wilderness Association
 2. The Wilderness Society
 3. Teton Backcountry Alliance
 4. Jackson Hole Wildlife Foundation
 5. Greater Yellowstone Coalition
 6. The Hole Hiking Experience
 7. Machine-Free Trails Association
- FOR: 10 organizations/groups (56%)
 1. The Blue Ribbon Coalition
 2. Jackson Hole Conservation Alliance
 3. Wyoming Office of Tourism
 4. Mountain Bike the Tetons
 5. TetonFreeriders
 6. Mountain Weekly News
 7. PeopleForBikes Coalition
 8. Alliance for Multiple use of Public Lands (AMPL)
 9. Friends of Pathways
 10. Hoff’s Bikesmith – submitted by Andrew Keehn
- OTHER: 1 organization/group (5%)
 1. Wyoming Game and Fish – submitted by Will Schultz (FOR Teton Pass and Horsetail proposed changes, AGAINST Munger Mountain proposed changes)

Question 4: What arguments were cited against and for the proposal?

Arguments AGAINST Proposal	% of comments that mentioned
Safety hazard	32%
e-MTBs are motorized and negatively impact recreation quality	25%

Negative impacts on wildlife	18%
Lack of enforcement	17%
User conflicts with walkers	17%
Greater congestion at trailheads / on trails	16%
Erosion / trail damage	14%
Conflicts with traditional cyclists	13%
User conflicts with horses and horseback riders	11%
Opening use on Teton Pass is a slippery slope that will lead to more areas approved for e-MTB use	10%
Inexperienced riders	8%
Future summer implications (technology advances), and future winter implications (advent of e-snow technology)	5%
Lithium-ion battery fires / chemical waste	4%
Infringement on Palisades Wilderness Study Area (WSA)	3%
Proposal should be included in larger forest-wide planning process	2%
Rescue services are already taxed	2%
Proposal should have been developed with input from user groups on both sides	1%

Arguments FOR Proposal	% of comments that mentioned
Access for elderly and/or inclusion of those with disabilities	18%
There's no evidence that e-MTBs cause greater trail or wildlife impacts	10%
Decrease vehicle traffic / congestion and allow for human-powered uphill shuttles for downhill bike access	10%
e-MTB use has been successful in other communities	5%
e-MTBs are quiet, dissimilar to dirt bikes	2%
Economic / tourism benefits	2%

Good for easier training and/or increased enjoyment	1%
Dirt bike trails currently approved for e-MTB use are rutted and bad for e-MTB riding	1%
True to the policy of “multiple use”	1%
Other agencies consider e-bikes exempt from motorized vehicle status	1%
Horses get access to GTNP, whereas bikes do not	<1%%

Question 4: What management topics and other suggestions were mentioned?

Management Topics and Other Suggestions	# of comments that mentioned
Allow e-MTBs on paved surfaces (Old Pass Road) and/or on other roads where there is room for e-MTB users to pass other users	7%
Institute permit system for those who demonstrate e-MTB need	7%
Begin with a limited trial basis, and have an adaptive management system	5%
Create public-safety education program	5%
Open every bike trail to e-MTBs	3 %
Sticker program for class 1 e-MTBs	3%
Trails South of the highway are OK to be approved for e-MTB use; trails North of the highway are NOT OK to be approved for e-MTB use	3%
Develop code of ethics that includes e-MTBs and post it at trailheads and intersections	2%
Phillips Canyon Trail should be designated “downhill biking only” (some comments also mentioned Black Canyon Trail, despite it not being included in proposal)	2%
Create new trails for e-MTB users	2%
Conduct data collection and analysis to study real impacts of e-MTB use (perhaps using cell-phone data collection program)	1%
Create wildlife and environmental impacts education program	1%
No Munger expansion because of elk parturition	1%

No extended riding seasons because trails would be ridden when wet, causing more trail damage	1%
Because Teton Pass trails can be shuttled, there would be more benefit to opening longer rides to e-MTB use (comments mentioned Mail Cabin, Red Creek, Mikesell, Mike Harris, Corral Creek)	1%
BTNF should add Lithium to the list of e-MTB trails	1%
Launch trail ambassador program to promote compliance and education	1%
Permit system should require visible identification numbers so other users can report bad behavior, if witnessed	1%
Apply dates of use and permit requirements to all users to avoid preferential treatment	1%
Ban all bicycle use (e-MTB and traditional) on trails	1%
Make use vary by day of the week (similar to Mill Creek Canyon in the Salt Lake Ranger District)	1%
Change the boundary of the Palisades WSA to south of the Black Canyon Trail	1%
Discuss and plan for who maintains the Old Pass Road into the future	1%
Include the Greater Snow King area (Cache Creek and Game Creek) trails	<1%
In the Environmental Assessment, include discussion of direct and indirect impacts on Palisades WSA	<1%
In the Environmental Assessment, consider impacts to IRAs (inventoried roadless areas)	<1%
In the Environmental Assessment, include enforcement plan (missing from scoping document, and without it there will be more user conflicts as users police other users)	<1%
e-MTB users should be required to ride with constantly ringing bells	<1%
over-snow e-MTB use should be approved too	<1%
Limit e-MTB use to within ski resort boundaries (Snow King, JHMR)	<1%
Have tent at major trailheads, run by e-MTB coalition, run the Class-1 sticker program	<1%
Trails North of the highway are OK to be approved for e-MTB use; trails South of the highway are NOT OK to be approved for e-MTB use	<1%

Infrastructure should be upgraded to meet demand from new users	<1%
New short trails should be designed and designated for ADA access	<1%

DISCUSSION

Public and organizational comments show strong opposition to the proposal of allowing e-mountain bikes on select Teton-area trails. Those in opposition state many reasons for their perspectives. Those in favor mostly note that the proposal will allow the aged and those with limited abilities to have access to the trail system. According to BTNF Supervisor, Todd Stiles, the Forest Service cannot implement a regulation allowing only seniors or the differently-abled to use e-MTBs. The Forest Service will either allow access for none or access for all. [AG1] Given the public’s sentiment, there is good reason to question the proposal and consider shelving the idea. An alternative action is to include this discussion in a broader context, such as the current BTNF Planning process or as part of a recreational assessment to comprehensively plan for the future of Teton Pass and other areas.

RESOURCES

- Bridger-Teton National Forest’s project landing page: [E-Bike Use Designation on Select Jackson Area Trails](#)
- Jackson Hole News and Guide, 10/7/23 (Billy Arnold): [Bridger-Teton may allow e-bikes on Teton Pass trails](#)
- Jackson Hole News and Guide, 10/25/23 (Guest Shot by Annie Band and Jon Hunt): [No, user conflicts will result from e-bikes on more trails](#)
- Jackson Hole News and Guide, 10/30/23 (Billy Arnold): [Comments due on Oct. 30 on Teton Pass e-bike](#)