BEAVER RIDGE RANCH
PO Box 482
Daniel, WY 83115

October 20, 2023

Jackson Ranger District
Forest Service
USDA
PO Box 1689
Jackson, WY 83001

Dear Sir or Madam:

Thank you for the opportunity to comment on E-Bike Use Designation on Select Jackson Area Trails, File Code: 1950/2350, dated September 28, 2023.

I have ridden trails all over the Bridger Teton National Forest for several decades, including the areas you are proposing for e-bike inclusion. I am a member of several Back Country Horsemen chapters in two states. I have ridden trails on public lands in 30 states and two countries and spend most of my time riding in the Bridger Teton National Forest and on public lands in Florida. In just the past 6 years I have logged 2,867 hours of riding on public lands. I have extensive experience riding trails with all kinds of bicycles in the southeastern United States. I believe this qualifies me to have an educated opinion of the E-bike proposal.

Most of my encounters with mountain bikes have been cordial and safe. None of my encounters with e-bikes have been safe or educational. My comments are not based on assumptions, but based on real experience.

I have serious concerns about e-bike use on trails that are designated for horse use. Motorized e-bikes and horses just do not mix and I will explain my thoughts and experiences as it relates to your proposal and explanations.

Purpose and Need
While I agree that e-bike use is growing, and I even agree that it is appropriate to consider how to accommodate them, putting a motorized vehicle on a non-motorized trail with horses is a recipe for disaster repeatedly.

As you may know, horses are fight or flight animals. Their first reaction is to flee. Horses cannot mentally process an object moving towards them at up to 20 mph, so they shift to their flight mode and often dump their rider if frightened by the encounter. Let me explain why this is different than other situations.

When deer, elk, fox, moose, or sheep move swiftly through the brush, they generally move away from the horse and the horse may be frightened for a moment, but does not feel it's life is in danger. Bear, wolves and, sometimes moose, run toward a horse. When they run toward the horse, the horse usually wants to run to escape, sometimes dumping the rider at some point. In a horse's mind, an electric bicycle is no different than a fast approaching predator. It is approaching at a fast steady pace and the horse only reacts. The bear or wolf are very "chance" encounters in the forest, but if you put the "electric predator" on the same trail with the horse you are guaranteeing a potentially life threatening encounter for the rider over and over again.

You state *"E-bikes can provide access to users who can no longer use traditional mountain bikes due to physical limitations but might not fall under the designation of adaptive. Those with disabilities, heart conditions, cardiovascular conditions, and older people who can no longer use a regular mountain bike all benefit from the*

extra assistance provided by an e-bike. Additionally, more people want to enjoy outdoor experiences with family or friends and view e-bikes as an opportunity to equalize the group's ability to ride together. **Equestrians would counter this statement with this: while you are accommodating e-bike-riding seniors, people with disabilities and health conditions, you are endangering the equestrians more. More seniors than ever are still horseback riding into their 70s and 80s; endangering them in order to accommodate the senior e-bicyclist is not fair to equestrians.**

We note a distinct difference between family bicyclists, street bicyclists, mountain bikers and e-bikers. Family bicyclists are generally going slowly to keep everyone together and they often stop to talk with us. Street bikers stay on the streets or very fast hard surfaces, not ones that equestrians typically ride. Mountain bikers for the most part belong to clubs or groups that educate them about trail etiquette and if not, we educate them as we meet on the trail, resulting in them slowing down, stopping, or pulling over and engaging in conversation as we pass. E-bikers, we have found, are not only new to e-bikes but often new to trails, few have an e-bike community to educate them on trail etiquette, and rarely do they think about horses having minds of their own.

You state that *"Although e-bikes are currently allowed on motorized routes, requiring shared use with OHVs and motorcycles has not provided the experience that e-mountain bikes (EMBT's) seek."* **Equestrians would say that this statement stands true for equestrians sharing trails with bikes, as well, yet we have been forced to do that. While we are reluctantly managing sharing trails with mountain bikes and making the best of it through mutual education and courtesy, the e-bikes add an element of stress and danger to non-motorized trails for equestrians and pedestrians. When equestrians ride a trail where bikes are prohibited, they breathe a sigh of relief because they don't have to be constantly looking over their shoulder or ahead to manage the next encounter. Instead, they can relax and enjoy the flora and fauna of the public land, providing them the best experience.**

The most important things a bicyclist can do to diffuse a tenuous situation for an equestrian is to slow down or stop (depending on the horse's reaction) and speak to the horse and rider. The human voice is soothing to the horse and identifies the bicycle as a person. E-bicyclists tend to stay in "go" and no talk mode, where mountain bicyclists are able to control their speed and communication with an equestrian better.

Definitions

While I appreciate the definition and distinction of each class of E-bike, I find it hard to believe that your limited number of forest law enforcement officers will be able to enforce the Class distinction in an e-bike trail enforcement situation. Further, its just a matter of time before e-bikes will be going faster than the Class 3 e-bike classification, if it is not happening already. An e-bike is an e-bike.

Over the past few years, a tremendous amount of money has been spent on bicycle trails that run from Hoback Junction up into the Tetons. It seems these would be conducive to e-bike use. During this same time, roads to trailheads and horse trailer parking areas have deteriorated, and been reduced in size by the number of competing uses at those trailheads, making it more difficult for equestrians to park to access trails. The addition of e-bike use at equestrian trailheads will push horse trailers out of these parking areas altogether. Horse trailers have been getting larger and more space is needed to maneuver them in a parking areas, not less. I have been boxed in by other users and had to wait for someone to come back to their car before I could leave with my horse trailer.

Conclusion

Horses and equestrians are a historic use of the Bridger Teton National Forest and deserve to retain their rightful place on the trails, whether working or recreating, without increased risk of injury or death from e-bike encounters.

I object to the use of e-bikes on the Arrow, Snotel, Phillips Ridge, Phillips Canyon, Old Pass Road and any other trail in the Bridger Teton National Forest that currently allows horses. I see nothing good coming out of mixing motorized e-bike and horse use on the same trail.

I could support the development of e-bike trails, similar to what has been done for OHVs, in areas where there is sufficient demand, but not at a loss to equestrians. If it is not feasible for e-bikes to have their own trails, then they need to share a trail with one of the other motorized uses.

While it is fair for e-bikes to have places they can go to recreate, it is not fair to endanger equestrians lives because of it

Thank you for the opportunity to comment. We hope you will do the right thing by equestrians.

Sincerely,
Nancy Stephens
Nancy Stephens