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Organization:

Title:

Comments: -> I am an avid equestrian, trail user, trail maintenance volunteer, and member of Arkansas Back Country Horsemen.

-> I am writing to express my position on the Forest Service's proposal to allow electric motorized bicycles (e-bikes) on existing non-motorized trails on portions of the Ouachita and Ozark-St. Francis National Forests.

-> I am concerned that such a proposal could generate substantial conflict among trail users, and result in significant safety issues for the horse and their rider. Horses will "spook" at anything coming at them on a narrow trail, especially an e-bike which is quiet and gives no warning. When a horse "spooks", it is an instinctive reaction where the horse will dart off suddenly into the woods, causing the rider to either fall off or get hit by a tree. Either way, the rider and horse are in GREAT danger if E-bikes are allowed on the same trails that were established by and have been used for decades by horsemen.

-> Also, USFS law enforcement personnel would be unable to adequately enforce compliance throughout these trail systems.

-> While e-bikes have a place on public lands, the introduction of e-bike use on otherwise non-motorized trails would result in significant safety concerns and increased conflicts among trail users. The Forest Service must analyze these and other potential impacts of the e-bike proposals in the forthcoming EA.

-> Equestrians seek out non-motorized trails on national forests in order to get away from fast-moving vehicles and enjoy a tranquil, natural environment. We often will choose to avoid trails where there is a potential for encounters with fast-moving bicycles. Most equestrians would find the specter of sharing trails with fast-moving e-bikes unappealing, if not frightening. The result would likely be the loss of these traditional users from much of the existing trail systems should the Forest Service authorize shared use by e-bikes.

-> I am particularly concerned with the specter of e-bike use on existing trails that comprise the Upper Buffalo Bike Trail system. Many of these trails lead to, and parallel, portions of the boundary of the Upper Buffalo Wilderness Area. I use trails in both the Wilderness Area and throughout the Upper Buffalo River area. These landscapes are highly scenic, remote, and provide some of the highest quality horseback riding experiences throughout the state, if not the entire southeastern U.S. For reasons stated in this public scoping letter, and as detailed in formal comments submitted by Arkansas Back Country Horsemen, the introduction of e-bike use on trails of the Upper Buffalo Bike Trail system would severely diminish my use and enjoyment of these trails and this unique landscape.

-> As equestrians, our selection among trails available in a given area is based, in large part, on safety concerns and the sometimes unpredictable response of our horses or mules in the event of a surprise on-trail encounter. The use of e-bikes, and their potential for travel at relatively high speeds, combined with their often silent approach, elevate the potential for such dangerous encounters.

-> Higher speeds on trails by one user group puts both user groups at risk. On average, equestrians travel along natural surface trails at speeds that average 3 mph or less. Class 1 e-bikes provide motor-assisted speeds up to 20 mph. Capable riders can exceed the maximum motor-assisted speed. The forthcoming EA analyses must recognize the significant discrepancy in the range of potential speeds by trail users and the resultant safety hazards that are certain to accrue should e-bike use be authorized on otherwise non-motorized trails.

-> The U.S. Forest Service has neither the resources nor the personnel to adequately monitor or enforce e-bike use on trails throughout the two forests. When viewed in the field, there are few distinctions among Class 1, 2 or the faster Class 3 e-bikes (motor-assisted speed up to 28 mph). Thus, restricting the use of one class versus another on a given trail or trails would be pointless and prove frustrating for Forest Service law enforcement personnel.

-> Many e-bikes sold on the market today are built with an appearance similar to a Class 1 e-bike, yet vastly exceed its maximum power and speed specifications. In addition, a search on YouTube yields dozens of tutorials on how to "hack" or override the speed constraints programmed into nearly every e-bike. These facts make irrefutable the claim that the Forest Service could neither adequately monitor nor enforce e-bike use on trails

shared by non-motorized users.

-> I support expanding recreational opportunities on our national forests and applaud the agency for seeking ways to support growing public recreational demand. While e-bikes have their place among our national forests, that place is on routes and trails dedicated to motorized use.

The Forest's current proposal and the management challenges it would pose is simply the wrong way to go about increasing motorized e-bike opportunities in our national forests. Those opportunities must not come at the expense of the safety and enjoyment of equestrians.

Barbara Gage