RE: FR Doc. [2020-21128](https://www.federalregister.gov/a/2020-21128)

I retired from the USFS after spending the last 22 years of my career as a forest-level recreation staffer. In my time (1980-2010) the national forests went from having no off-road bike use to having such use become the dominant one in many areas. Horseback riders and hikers have been displaced from popular trails because of safety issues and an inability to enjoy the trails without having to constantly be on the lookout for sudden encounters with fast moving bikes.

Some of my worries about adding another category of two-wheeled vehicle to trails where motor vehicles are not allowed are the following.

Safety. Forest trails in our area are rough and steep. The existing speeds of some bikers already increase the chances of an accident or a collision with another trail user or his dog. Since e-bikes can travel considerably faster, the trails would be less safe. In our area e-bikes have now been allowed on the system of paved pathways which were formerly non-motorized. We’ve seen conflicts increase even on these smooth, wide paths. Forest trails in our area are not suitable to such use and the USFS doesn’t have adequate funding to maintain what we have, much less to reconstruct for another use. Also, our backcountry areas are large and remote and thus attract backpackers, hunters and horse packers. Adding e-bikes to trails used by pack strings of bear-spooked mules sounds like a really bad idea. Another safety factor that has already been a problem with fast-moving bikes is the potential for conflict with wildlife, especially species like bears and moose which are as likely to come after a surprise visitor as to run off.

Conflicts between uses. There is an inherent incompatibility between trails uses that are slow and fast on the same trail. Few bikers in my experience use a bell or other ways to alert hikers until they are almost upon you. Being startled does not add to one’s enjoyment of the peaceful forest. In spite of rules and signage on the trails, many bikers expect others to yield, often requiring a quick scramble. I’ve been whacked in the forearm by handlebars enough times to have learned to avoid narrow trails where it’s hard to jump aside. A friend was bucked off her horse when a biker came up fast behind her. I imagine this would only increase with another category of vehicle that can go faster than the bikes already do. (It doesn’t matter for this discussion but my husband and I both own mountain bikes so this isn’t an anti-bike screed.)

Trail condition issues. Many of the forest trails around populated areas have had to be redesigned and relocated to be sustainable with heavy bike use. Our soils tend to be heavy clay and some are not armored with rock, so they can quickly turn into V-shaped ditches which are difficult to walk or ride in. Many trails and class 2 roads cross bogs, creeks, and landslide areas and lack proper bridges or puncheon. We have many examples of soil and vegetation damage in such places due to wheeled vehicles (and, to be fair, heavy horse use can do the same kind of damage, but they pass through the bogs to get to the other side, not necessarily to play in them). Bikers often ride around others rather than slow or stop, and continual trampling of trailside vegetation has turned some trails into wide thoroughfares. Safer for passing, but more prone to soil erosion. Since most of our trails and roads are what we might call rough, especially the class 2 roads that receive little or no maintenance, they are not good candidates for a decent place to send bikers. So, given the current situation, without legal e-bikes on the trails, adding them will likely add to the problem of trail damage and the need for reconstruction since they weigh more and go faster than regular bikes. And the trails would continue to be widened to the point of not seeming much like single-track.

Non-compatibility with existing travel management. The USFS has long used tools such as the Recreation Opportunity Spectrum and travel maps to keep motorized and non-motorized uses separated so that everyone can enjoy their particular type of recreation. Adding e-bikes to the non-motorized trail system would muddy ROS categories and require a whole new effort to designate and map (and construct for sustainability) e-bike trails. E-bikes are motorized and should be kept in places suitable for that use. In our forest’s travel management we have tried to give trailbikes and ATVs good places to go, in spite of all the terrain, soil, landslide, wildlife, and other constraints. E-bikes could and do share that trail system, and we should not be expected to find ways to expand it. If we built trails for e-bikes, the motorcyclists would ask why they couldn’t use them too and the USFS would not have a good answer.

Displacement of traditional trail users. We have a few popular bike trails in our area but the majority of users are hikers, backpackers, hunters, horse packers, people walking dogs and taking children for walks, and those who seek quiet, nature, and freedom from the ultra-motorized and noisy world we live in. Introducing e-bikes into the back country would change the experience for people seeking semi-primitive non-motorized recreation.

In summary, revising existing travel management policies that require motorized vehicles to be confined to a system of designated roads and trails does not serve people or the resource. The USFS is already strapped for funds to manage the huge numbers of people coming to the forests, and this would only put more pressure on them to provide for yet another new type of use. E-bikes are great for commuting and getting around town. I don’t think they are that suitable for the kind of terrain our area has.

And one last thing. I have heard the excuse of allowing the elderly or disabled to access the national forest whenever a new motorized vehicle comes along. The same argument was made for snowmobiles and ATVs. I am sure some disabled people enjoy these means of transport, but the kind of recreation use I see involving motor vehicles does not include Grandpa putting along watching birds from his ATV. Users tend to be young and want to race, hill climb, high-mark and travel in groups of friends who seek the same kind of fun. We have built some bike-only trails in this area to accommodate them, including jumps and other features. If a disabled person can lift a heavy e-bike and climb aboard, it makes sense to give him a safe place to go, which in my view would be a smooth surface gentle route, not the trails most bikers seem to look for.