To Whom It May Concern:

A recent post suggests that permitting E-Bikes on gated forest service roads would provide recreational opportunities and greater access to forest service lands. I disagree. I would like to suggest some facts to support why E-bikes should not be allowed additional access to forest service lands, other than the areas which have already been designated for E-Bike usage.

* The premise that motorized E-bikes will allow more access to forest service lands is false, as currently traditional bicycles are already allowed on most gated forest service roads and bicycle trails. Increased access for bicycles and other forest users would only be gained by purchasing right of ways to inaccessible parcels of land that are currently only accessible to landowners around such parcels of land.
* Another issue that would arise in allowing E-bikes on forest service roads would be the inequality created by the expense of the E-bikes. This would provide recreational opportunities to the wealthy who can afford to purchase the said E-bikes. Our nation’s forest is to be enjoyed by all, not just a privileged few.
* E-bikes are currently allowed on over 60,000 miles of forest service roads and trails. I question why this vast amount is not enough to serve the recreational needs of E-Bike riders.
* Currently our law enforcement is spread thin dealing with illegal activities on our forest service lands. This includes removal of forest products, such as galax, ginseng, moss, ramps, and wood products, illegal harvest of animal and illegal drug activities. The E-Bike will promote an increase in illegal activities by allowing persons to pull trailers with heavy loads and to venture further into the interior of our forests in obscure locations where illegal activities can continue unchecked.
* Allowing E-Bikes would increase the potential for illegal trails to be created at the end of existing roads, thereby tying two or more road systems together to create a loop trail system that were not meant to be connected.
* E-Bikes would increase an already growing issue the forest service has with private landowners whose land borders forest service land. Some of these landowners are creating their own system of bike and walking trails starting from their private property onto forest service land to access forest service trails, such as the Bartram Trail and the Little Yellow Mountain Trail. E-Bikes would promote the increase in an undesignated trail system on our forest service lands.
* Another result in allowing unabated use of E-Bikes on our forest service lands is overcrowding. There is already a loss of user experience due to overcrowding, not to mention the increase threat to safety of visitors due to overcrowding. Adding another user group could lead to further conflict among current users and the motorized users. For example, the E-Bike technology allows for faster travel speeds and an unannounced approach to a non-E-Bike rider or horse rider. This could cause a collision and possible serious injuries or fatalities in an area that is not easily accessed by emergency personnel.
* At some gates and trail heads there are only large enough parking areas to handle 2 to 10 vehicles. Allowing another user group would create an increase in illegal parking and traffic accidents. How is law enforcement going to manage this increase in traffic burdens and accident issues without incurring increased cost of hiring more law enforcement? Law enforcement cannot keep current laws enforced. How are they going to enforce an E-Bike law based on motor size by class? Furthermore, there would be increased cost of building additional parking areas to accommodate the increase in E-Bike visitors, increased costs of maintenance of current trail heads due to erosion of trails caused by the E-Bikes and additional cost of building new trails to accommodate the new E-Bike visitor groups.
* There would be a burden to the districts that are charged with maintaining the trails and roads. The Forest Service does not receive enough funding to handle the current backlog of trail and building maintenance needs. The recently signed Outdoors Act went mostly to the Park Service (70%) to fund their backlog of maintenance needs. Adding more trails and accompanying amenities is not feasible. Additionally, another burden would be retrieving E-bikes from forest trails and roads when they are ridden past the capabilities of the machine and person, as E-Bikes weigh 90+ pounds.
* Finally, the forest’s environment would be negatively impacted. Increasing parking areas and building new trails to support higher use would negatively impact already shrinking wildlife habitat and wildlife population. The eastern forest service land base is more susceptible to erosion than its western counterpart. Our western counterpart has thin soils with a rocky base, whereas our eastern lands have a deeper soil base that is more prone to erosion, especially from continued use by mechanical means. Allowing this additional user group will promote the business of guided E-Bike tours. This repetitive use of trails and gated roads sowed as wildlife habitats will become degraded and unusable as such.

In conclusion the forest service should not grant special treatment to a small group of forest users just because they request it. Electric motorized vehicles, be it Class 1, Class 2 or Class 3 are still motorized vehicles and should not allowed on our forests unless on areas already designed for motor vehicle use. There is already appointed ORV (Off Road Vehicle) areas, which allow E-Bike users access to our forest. If we allow all areas to be opened to unabashed access to our forest, we will destroy our forest landscape and the tranquil experience that most forest visitors long for.