

October 26, 2020

Re: E-bikes should not be allowed on non-motorized trails

To whom it may concern:

It appears that the USFS is considering the adoption of e-bike definitions to enable allowing them on non-motorized trails where bicycles are currently allowed. Although I'm an avid trail user and have worked in land management and conservation for 15 years, I am providing my perspective solely as a private citizen, and my opinions herein do not represent those of any agency I have worked for, past or present.

There are many arguments being made for and against allowing electric bicycles on non-motorized trails. Here are just a few:

E-bikes increase access for *everyone*.

I'd like to hear from western land managers who say what they really need are greater numbers of people on trails. Unfortunately, that's just not the case. What they need are more staff and more financial resources to manage the maintenance needs and user conflicts and demands they already have. They are getting crushed by population growth and growth of the outdoor industry, particularly now during COVID. Our natural resources and our user experiences are suffering. The demand for new trails and separated uses on trails has never been higher, at the expense of wildlife habitat loss. Mountain bikes are so much more capable than they were even 10 years ago, and they can travel much faster in difficult terrain that may have formerly been the domain of hikers. There is basically no existing capacity or will to regulate use or user behavior (and this includes classes of e-bikes as well-intentioned as that may be). Nevermind the existing lack of capacity to regulate trail impacts by inexperienced users, and to respond to their safety needs. *Without any additional management resources being proposed, why would we want to add e-bikes into this mix?*

E-bikes *can* help more people get out on the trails. People who are elderly, with health conditions, inexperienced, or unfit. This seems like a worthy endeavor – who doesn't want a healthier, happier population?

But it isn't just the elderly or the inexperienced who want to e-bike. High-end bicycle manufacturers are marketing extremely capable bikes to advanced and expert riders. These riders will be traveling more miles of trail each ride and at faster speeds, creating more conflict and more need for maintenance. Right now, the bikes are prohibitively expensive and the use question too ambiguous for them to be widespread, but that will change over time. Any research being done currently on the impacts of e-bikes cannot possibly contemplate how much more prevalent they will be in the coming years. E-bike advocates rarely talk about the use of e-bikes for downhill shuttle laps, or bike packing, or to reach places that they've never been before – but that *will* be the case. I think that sounds fun too - but not at the expense of

everyone else's experience or the stewardship of our public lands. This isn't just about your uncle who had knee replacement. There is no way to allow one type of use without the other.

Natural resource and safety impacts

Non-motorized trails weren't designed for e-bikes. The sight distances weren't designed for people traveling 15-20 mph (or faster) uphill where bikes could formerly only go 3mph. They weren't designed for the speed differentials we're going to see between e-bikes, hikers, equestrians and bikes. In many cases, non-motorized trails were built on easements across private land. Easements for non-motorized use that may be endangered by allowing e-bikes on them (or by the same token, not having the capacity to regulate them).

I don't believe adequate research has been done to examine trail impacts, particularly to steep and erodible ones, by a heavier bike with a motor. Nor has research examined the impact of 2-3 times more use (distance) per each average ride. Who wouldn't want to lap their favorite downhill three times after work instead of once? Of course that sounds fun. But how will this displace other users? How will it affect wildlife? How much more conflict will it cause? How much more trail erosion? How will the user experience of solitude be negatively impacted?

E-bikes and e-bike legislation are being promoted by the bike industry, who are doing nothing to help land managers accommodate their use.

If the bike manufacturing industry is telling us we must have e-bikes, then THEY should be helping fund the research, buying the land for new trails, and paying for the trail construction and maintenance that's adequate for e-bikes. And yet, I hear nothing. Not even an attempt being made to educate buyers on where e-bikes are and are not allowed, and how riding them where they aren't allowed or without proper etiquette will jeopardize access for all of us.

E-bikes are popular in the rest of the world, why not here? I would argue that few places have the land management and travel management history of the western US, nor the user numbers or disparate user groups. Just because it works somewhere else, doesn't mean it will here.

Change is inevitable, and there are places for people to benefit from e-bikes.

There's nothing I love more or that makes me feel stronger or more content than riding my bicycle in the woods. I recognize and appreciate that so many people in the decades before me advocated for and built the trails that I am now privileged to enjoy. I know that change is inevitable and adaptation essential. When I'm too old or injured to ride, I will hike more or ride an e-bike on motorized routes. It is already quite difficult to find time to yourself on the trails; we do not need a reason funded by private industry to ratchet up use. I want others to have the same regenerative and powerful experience of solitude in nature that I have had.

E-bikes are absolutely appropriate on the miles of roads and trails where motorized travel is already allowed, and where enforcement is feasible to keep them from non-motorized routes. I

also think there is great benefit for commuters to produce less greenhouse gases and get healthier by riding their e-bikes. But it's still a bicycle with a motor. That should have been the end of the story on non-motorized trails.

We aren't ready for this change. Any decision made now must take into account how bike sales and use patterns will change drastically because of it. At an absolute minimum, each local jurisdiction familiar with its trails and users, **MUST** be able to make its own decisions on e-bikes and where they are appropriate from a natural resource, user experience, and safety perspective. And please educate the public on the decisions made. Much confusion has already been caused by the Department of the Interior's mandate on e-bikes on BLM lands, resulting in many people believing it's legal to ride an e-bike on any BLM trail.

I appreciate your time in reading this letter, and the opportunity to provide input.

Sincerely,
Katherine King