

Data Submitted (UTC 11): 10/20/2020 3:37:22 PM

First name: Jason

Last name: Wooden

Organization:

Title:

Comments: To Whom it May Concern,

As an avid, daily, trail user on USFS administered lands (trail running, hiking, hunting and mountain biking) I have witnessed first-hand the explosion in e-bike use in the national forest. Here are my recommendations based on the observations I have seen:

1. It is not necessary or prudent to create a special category for e-bikes as proposed FSM 7700 and trail designations for such as proposed in 7710. E-bikes are motorcycles. They have motors. They should only be allowed on the same trails as motorcycles, and not allowed on non-motorized trails.
2. Even the proposed Class 1 e-bikes travel at much higher-rates-of-speed (especially on uphill and technical trails otherwise requiring a high amount of rider skill) than bicycles do. This creates a high potential for collisions and possible injury when e-bikes and non-motorized users (trail runners, hikers, horse riders) share the same trails. Furthermore, e-bikes are silent and frequently appear without warning, unlike a motorcycle.
3. E-bike users are generally new to the sport, unfit and display a lack of knowledge of basic trail etiquette. Generally they do not yield to non-motorized users, nor to uphill traffic. They expect everyone else to get out of their way, even though it is much easier to get going again on an e-bike than a bicycle. When batteries die or malfunctions occur, they are wholly unprepared physically to extract themselves from the backcountry. I predict e-bike users will become an additional burden to Search and Rescue organizations.
4. E-bikes are an enabling technology that allow new, inexperienced users with financial means an easier way to access the backcountry. This has resulted in an explosion in backcountry use of e-bikes. Much in the way powder-specific snowmobiles enabled the wealthy to over-run domains that were once visited only by a few hardcore ski-mountaineers; e-bikes are enabling users on distant, technical trails that were only seldom used by the fittest mountain bikers, trail runners and horse riders. Encounters with e-bikes and sightings of e-bike tracks are even happening in local wilderness areas on extremely steep, technical terrain (see <https://www.strava.com/activities/3679131847> for an example, screen grab attached in case it is taken down). There seems to be an attitude of "I paid \$4000 for this machine, I'll take it wherever I please". Local bike shops are reinforcing this behavior by selling them without any mention of where they can be legally ridden. E-bikes should be registered and require OHV training to operate, just like all other motorized vehicles.

In summary, technically difficult backcountry trails provide a natural barrier to being overrun by the general public. E-bikes effectively flatten the grades, shorten the distances and remove the obstacles that keep otherwise seldom-visited trails from becoming amusement-park-like attractions. Adding e-bikes to the mix of non-motorized users would be a paramount mistake. Safety incidents, erosion, user conflicts, trash, wildlife stress and other negative environmental consequences will no-doubt increase exponentially if allowed on non-motorized backcountry trails.

Sincerely,

Jason Wooden

UT