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Organization:
Title:
Comments: RE: E- Bikes are motorized and should not be allowed on non-motorized trails
October 21, 2020
To Whom it May Concern,

Defining E-Bikes. They are not 'non-motorized', nor are they 'mechanized.'

It appears that the first hurdle is to define E-Bikes. Currently they are defined as a motorized vehicle, because a motor is required to move this vehicle forward. One argument is that because you have to pedal this 'bike', it cannot be defined as motorized, because motorized is defined as self-propelled (while non-motorized is defined as human powered.)

But who goes out on an E bike and just pedals without using the motor? The whole point of an E bike is to use the motor. These bikes are very heavy and one would never just ride an e-bike without using the motor. Yes, visually they look like bikes, and telling the difference between Class 1 or 2 is difficult. And yes, you do pedal. But it is the motor that keeps you propelling forward. All three classes of E-Bikes are most definitely motorized vehicles. Feel free to give them another name, but they should not be allowed on non-motorized trails because they have a motor and as we know from experience, when you have a motor, that dramatically changes the trail/road experience. This is WHY we have the designation of motorized and non-motorized.

To be fair, E bikes are a legitimate trail user group. The problem with them isn't the means of use, but the effort to try and combine a motorized activity with a non-motorized activity when trail use has historically used motorized vs. non-motorized as a primary distinction and one could say this has been the only means of trail management. E Bikes have everything to gain by pretending to be non-motorized and traditional mountain bikes have nothing to gain and a lot to lose.

Why does defining an E-Bike as motorized or something similar matter so much?

I have been an avid mountain biker since they were first invented, in 1984. I'm 56 years old and an advanced mountain biker living in Breckenridge, Colorado, one of the best mountain biking destinations in the United States.

From the very beginning, differentiating between motorized and non-motorized was a huge issue for mountain bikers in the late 80's and there was an effort by horseman and hikers to classify us as motorized right from the start because they wanted us off their trails. The hiking and horse community disliked our faster speeds on descents, our invasion of their solitude, and their (mostly false) claim that we scared wildlife more than they did. But mountain bikers were just so out of place with the motorized world. These were not our people. We were scared by the motorized users' fast speeds, their rough trails from heavy motorized use, and their disruption of a quiet human powered experience. Mountain Bikers did not belong in the motorized category but we were sensitive to the issues we brought to the non-motorized community and knew we had to address it. To this end, we were not classified as motorized but given a new prescription, 'mechanized', and that enabled the hiking/horse community (and I am a big hiker as well) to justify closing off some trails to mountain bikers as well as all wilderness. This historical distinction between motorized and non-motorized is very important to maintain in order to protect trail conditions, to allow for solitude, to limit crowding , to reduce trail conflicts, and most importantly to manage safety. It is the main tool the USFS uses to manage the forest.

Please also take note that those behind trying to align E-Bikes with non-motorized bikes are those who are sponsored by the industry - IMBA, People For Bikes are two organizations which come to mind, two organizations that can only survive with support from bike companies moving into the E-Bike venue, such as Trek, Specialized etc. They are also responsible for many of the studies conducted on E-Bikes which always seem to favor the E-Bike. Also, I wonder if the decision makers from the Secretary of Interior (BLM, NPS) weighed equally the comments they received from IMBA, People for Bikes and pro E-bikers, against those of us with many years of trail experience, and firsthand knowledge of current trail conflicts. It seems like the Secretary of Interior and Agriculture tend to lean more towards industry than towards people. Luckily not allowing E-Bikes on non-motorized trails doesn't mean they can't go anywhere, despite how they like to portray that it is non-motorized or nothing. There are thousands of miles of beautiful motorized dirt roads and trails suitable for E-Bikes. Please, USFS, get some expert advice from experienced local mountain bikers and hikers from areas where mountain biking is popular.

You cannot justify allowing E-Bikes because of how popular they are in Europe. The bike industry keeps pushing this mantra that "E Bikes are here to stay, just look at Europe and get used to it." The reason they are so popular in Europe is because very few people rode mountain bikes on their trails because they were too steep or technical. E Bikes suddenly made those hiking trails rideable. There were no previous rules in Europe keeping bikes off of non-motorized trails because it wasn't an issue since very few mountain bikers were ever on those trails and so E-Bikes invaded their trails quite quickly since there were no restrictions. My limited experience with E-bikes in Italy was that they really didn't mix with the crowded trails we hiked in the Dolomites and I felt sorry for the hikers.

Current state of non-motorized trails. It's busy out there.

One of the biggest conflicts on non-motorized trails with mountain bikes is their speed. And to date, there has been very little, if any, etiquette education from the USFS. Horseman, Hikers and even other mountain bikers are often terrified of bikers (young males, 20-30 years old) flying down a trail towards them, or horrified as they watch that mountain biker skidding sideways in his weak attempt to slow down in order to avoid a collision, or that mountain biker flying off the trail bouncing over wildflower and sensitive grasses just to get around you.

Over the years though, mountain bikers knew that their trail access was threatened due to their fast speeds, and without any help from the Forest Service, we have learned some manners and for awhile trail conflict had been reduced. Unfortunately the new generation of mountain bikers, along with the new technology of mountain bikes capable of traveling much faster, are even more keen on speed and the trail conflicts are on the rise again. My local community has taken it upon themselves to educate riders with signs that say, 'You are descending. Stop for uphill traffic." But the Forest Service hasn't done anything on a national level and so just because we have this rule doesn't mean our visitors are familiar with it.

And it's not just mountain bikers who cause conflict on trails. Hikers have their own set of issues because they cut corners on trails, camp in sensitive areas, walk on trails even when they're muddy and disturb wildlife because they can easily walk off trail. Horseman don't pick up their horses' poop in the middle of a trail so now hikers and bikers are dodging poop, swatting horse flies and watching the weeds grow on the sides of our trails. Horsemen are also insensitive about staying off wet trails.

There are so many conflicts on our trails right now and nothing is being done about it.

Please, understand then, that adding E-Bikes to non-motorized trails is like the cart before the horse. We need to

first solve the conflicts that exist on our trails before you make the situation ten times worse.

Why do E-Bikes not belong on non-motorized trails?
Lack of experience

E Bikes appeal to the disabled, the elderly, and those, at least from my experience, who have not spent much time on a mountain bike, because of the fitness and skill required to ride mountain bikes. This is going to be a significantly large new group arriving on our trails with little knowledge on etiquette or probably most importantly, the skills needed on how to ride a bike. Mountain biking isn't like just going out for a walk. It can be very intimidating and dangerous, especially on a narrow trail. The typical E-Bike rider really does not belong on a non-motorized trail and the number of trail etiquette issues will get much, much worse. And it won't just be run-ins with other hikers or fast mountain bikers, it will be the E-Biker not knowing how to ride a rocky section, or unable to push that heavy bike up a hill they couldn't make or they could have a mechanical with a heavy bike that is too hard to push or pedal.

The last thing we need right now on our trails are MORE fast bikers on our trails, and E-Bikers, new to the scene, will have no idea that their speed is intimidatingly fast as they fly past another trail user. They will have no idea that their speed is totally out of character with that trail and no one ever travels that fast, especially with the possibility that another rider or hiker is just around that corner. E-Bikes do not belong. Motorized use does not belong. This is the USFS's most important management tool, separating motorized from non-motorized.

Novice E-Bikers will have the ability to ride up that same steep hill that human powered cyclists usually have struggled with and sometimes we might even have to walk up that hill. So if a human powered mountain biker is struggling up a hill, and an E-bike comes flying up behind them, does that rider need to stop and let the rider pass? Often when a mountain biker has to stop halfway up a steep climb, it is impossible to start riding again, very frustrating. And if we don't let the E-Biker pass, do they have the skills to stop and start again up a steep hill without spinning out (a major cause of trail damage.) And if they are elderly or disabled or out of shape or lacking skills, how will they do pushing that heavy bike up the hill? If E-Bikers were only allowed on motorized singletrack, none of these scenarios would be an issue, because they will be the slower trail user, rather than the fastest. They certainly won't be wanting to pass a dirt biker, or scaring a dirt biker, like they would a hiker, horseman or another mountain biker.

Surprise! Many Expert riders, will also love E-Bikes

No one seems to mention that E-Bikes will also appeal to the expert rider, but it will. I know this because I am friends with some very strong mountain bikers and they love their E-Bike on motorized singletrack. Have you seen the photos in magazines of expert riders catching air on their new E-Bike? In particular I am thinking of a photo I saw in 2017, where Trek Bikes was working with a mountain bike advocacy group trying to get Utah to open its State Parks to E-Bikes on its non-motorized trails, which did eventually happen. This rider, (a nice guy) was on the Dead Horse Point State Park Trails near Moab - a very busy non-motorized mountain biking destination for families because the trails are fairly easy - yet here he is launching it off a rock on his E-Bike, something he could never have done on a regular mountain bike. How would you feel, as a parent, if your child biked up to a guy in midair on his E-Bike coming right at you? Many expert riders are going to turn to E-Bikes because now they can finally motor their way through a technical rock garden, or they can now ride up the massive climb to get to their favorite descent. Trails that saw light use could get so much more crowded, and not just from elderly or disabled folks riding E-Bikes but plenty of advanced riders as well.

E Bikes definitely damage trails. The studies disagreeing with this were so biased.

To me, this notion that E-Bikes won't cause much more damage than a mountain bike is just baloney. It is plain and simple physics that they will cause damage. Speed causes more damage. More power causes more damage. This is true for human powered use and so a motor will make it exponentially worse. More trail users cause more damage. Breckenridge had a brand new trail which was used in a mountain bike race of 700 riders and it aged significantly in just a few days. And please, that IMBA study was so flawed - they used expert riders who know how to ride without damaging a trail. If you want to conduct a study on E-Bikes, use that elderly or disabled rider you are promoting, or an advanced rider who wants to power through a technical rock garden or fly up a hill.

My husband rides a townie E bike and when he uses a legal dirt path to get up a hill, he skids out on the climb because of the sudden surge of power. He is an expert rider who has mountain biked for thirty years and he knows how to ride. Skidding on a trail is not good. It leaves a rut and makes it harder for the next person to climb that same hill. My limited experience with E-Bikes (St. George, Utah) was three elderly people skidding their way UP a trail yelling at us to get out of the way. Because E-Bikes have extra power, they will be more likely to loosen rocks and churn up dirt on steeper trails. Going fast increases washboards on trails. More traffic on trails makes them wider and dustier. E bikers will also be less connected to the negative effects they have on a wet trail, because the motor will help them power through deep mud and because they are new to the bike scene and many won't know that we aren't supposed to ride on wet trails. (Yes, USFS, you could really help educate the masses on this one for both motorized and non-motorized.)

If you want to see the difference to a trail with motorized use versus non-motorized, please go check it out. Today I went for a ride that was a combination of non-motorized and motorized singletrack, both trails were built around the same time and both built with the latest trail building science to keep them 'sustainable' -i.e. not that steep and good drainage practices. Good modern trail building skills. The non-motorized singletrack was in great shape despite having seen a lot of traffic this summer. But the motorized singletrack was no fun, at least from my perspective as someone riding without a motor. It had numerous deep ruts on climbs. There were many sections of loose rock. And this went on and on, so I turned around, despite that this trail is marketed as a great mountain bike loop.

When those motorized trails were first built, I could bike on them, but now, they were really challenging and unpleasant for a human powered rider. Motorized use (E-Bikes included) increase the age of a trail significantly faster than a mountain bike trail. But luckily for the motorized crowd, they don't care and don't really notice the deteriorating trail conditions because they have the motor to get them through that rut or those loose rocks. An E-Biker would probably find riding a motorized singletrack as a pretty good experience because they too will have the power necessary to motor through rough sections. This is where E-Bikers belong, on motorized trails where the damage is already done. I know E-Bikes won't cause the same degree of damage a dirt biker would, but they certainly are much more of an impact, much more than some of those studies claimed, than a non-motorized biker.

Lastly, the USFS has very little funds for trail maintenance. E-Bikes will increase damage at a faster rate on non-motorized trails. Our trails need help right now. From my thirty-five years of riding on NFS trails, I have seen very little maintenance and trails are falling apart.

Why do we have a separation between motorized and non-motorized?

The Forest Service loves to promote the concept of multi-use. But why then, did the Forest Service make a distinction between motorized and non-motorized years ago if multi use is such a key component of their mandate? And the user groups are not compatible.
- Safety is a big reason to keep non-motorized and motorized seperate. Motorized users travel at much greater speeds and can come flying up a road and narrowly miss a hiker or a biker. Non-motorized users appreciate sharing a trail with user groups that all travel at similar speeds - hiker, horses and bikers all go uphill at similar rates of speed.
- To protect natural resources. Motorized use unfortunately has a history of traveling off road even if it is illegal. By limiting where they can go, you limit the damage they could do.
- the overall outdoor experience. Non-motorized users and motorized users both like the solitude and peace but this certainly wouldn't be the case if we had to share everything with motorized. E-Bikes will add a huge amount of new users to non-motorized trails and the experience will diminish.
-the cheapest way to manage trails. The USFS has not done much to educate trail users on etiquette despite speed being the number one conflict. Separating non-motorized from motorized is really the only form of management we've got, yet trail conflicts are on the rise. The last thing we need is more crowded trails with inexperienced riders on motorized bikes.

Let's talk about all the amazing terrain available to an E-Biker

So often when I read comments from fans of E-Bikes it is that finally "I am able to ride with my son who is much more fit than I am" or a disabled person so thrilled that they can ride a bike and their argument is more that if they didn't have non-motorized trails they wouldn't be able to use their E-Bike. This does tug on your heartstrings, but the problem is there are hundreds of miles of motorized roads and trails for an E-Bike rider and yet this is never mentioned. It's as if the only place they can ride is on non-motorized trails.
Personally, I think I will buy an E-Bike specifically to be able to ride on the vast network of motorized roads and trails throughout Colorado and yes, all over the United States. There are so many roads I don't ride because of their difficulty or because they are time consuming and this would open up a whole new world for me. Here in Colorado we have some beautiful jeep roads and motorized singletrack that could easily entertain an E-Biker. Here in Summit County, I could rattle off at least a hundred roads and trails for E-Bike heaven.
In addition, if something were to happen to that E-Biker, especially if they are disabled or elderly, there is a better chance of someone in a motorized vehicle coming to their rescue.

Lastly, it is becoming increasingly difficult to recognize the difference between a Class 1 or 2 E-Bike and so if you only allow them on motorized trails, it is just one less issue for overworked USFS law enforcement to have to deal with and in reality, they probably wouldn't be able to deal with a Class 2 or 3 E-bike on a non-motorized trail. I have never seen a law enforcement USFS worker on a trail.

Conclusion

Are the decision makers on this issue folks who mountain bike or hike? It worries me that I am sending this to someone in Washington D.C. Please, if you don't have much experience with non-motorized bike trails, or

familiarity with the deep history of 'motorized vs. non-motorized' take my letter and the many others opposed to E-Bikes with an equal amount of examination. The separation of motorized and non-motorized is a concept that has so much significance for current trail users and is the main way the USFS has been able to cheaply manage trails. E-Bikes are motorized and do not belong on non-motorized trails. Our non-motorized trails are too crowded, trail conflicts are on the rise, and our non-motorized trails need work. There are hundreds of miles of dirt roads and trails for E bike use and I can't wait to buy an E-Bike just so I can ride on all the motorized dirt roads in Colorado.