

Data Submitted (UTC 11): 10/23/2020 3:44:37 PM

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Comments: We urge you to withdraw this proposed rule. There is no reason for it. Electric bicycles are motorized vehicles, regardless of their Class, and should continue to be treated as motorized vehicles under the Travel Management Rule and other Forest Service directives.

It is already hard enough to tell a regular pedal bike from an eBike. Breaking eBikes down into several classifications will do nothing to make that distinction and enforcement of motorized restriction easier.

This proposed rule appears to have no other useful purpose other than to create more confusion and wiggle room within which the Forest Service can try to allow eBikes on roads and trails closed to motorized use - which would violate the Travel Management Rule.

From a scientific and practical standpoint, pedal bikes should be considered "motorized" due to their elevated impacts to wildlife. Research is consistently showing that pedal bikes displace wildlife more than hiking and horseback riding and "suggest that wildlife in the study area may perceive mountain bikers more similarly to motorized vehicles than to nonmotorized recreation." (Naidoo and Burton 2020. See also Naylor et al 2009).

Add to this the fact that eBikes add to the range that bicycles are able and likely to travel in a given time period, and the displacement of wildlife and other recreation types is certain to be more on the order of other motorized vehicles.

We've attached the October 10 comments of Friends of the Clearwater in this regard.

Please drop this proposed rule change and simply continue to treat eBikes as the motorized vehicles that they are. If there is any need for change, it is to consider pedal bikes as motorized vehicles in terms of their displacement of wildlife and other recreation types. You appear headed in the wrong direction.