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Comments: I support giving individual land managers the ability to assess individual trail suitability for e-bikes on a case-by-case basis.

I do not support blanket e-bike permissions on every trail where bicycle access is permitted because e-bikes are a different category of use and deserve their own management considerations. They have increased speed on uphill and flat sections of trail, which gives increased chances for user conflict, especially with hikers and horses. Their increased power gives them capability to ride uphill on sections of trail that have previously only been ridden by mountain bikers in a downhill direction due to grade, creating opportunities for totally new encounters.

As such, e-bikes should have specific trail etiquette rules to minimize conflict. In particular, I have had problems in the past with e-bikes (as a mountain bike rider and as a hiker) passing too closely, too fast, and without announcing (even on USFS trails where e-bikes have been prohibited). This has happened often enough that I feel like a particular point about passing and yielding to other trail users needs to be emphasized. Something such as "e-bikes should yield to all other trail users" or an even more general rule such as "faster trail users should yield to slower trail users" should cover those bases.

Even in the mountain bike community, passing and yielding etiquette is a largely misunderstood topic and it seems like the growing popularity of privately owned/managed bike parks with unique rules (such as directional trails, bike-priority trails, bike-only trails, and specific yielding instructions) is increasing confusion with the rules on multiple-use, multi-directional public trails. Adding to this growing confusion, the resorts make their unique rules explicit and extremely obvious, whereas the rules on many public lands can be difficult to find, and frequently not posted at all at trailheads.

E-bikes also present their own increased fire dangers. There have been battery fires from e-bike batteries. This is less of a concern from more expensive models from major manufacturers, but aftermarket kits from overseas and bargain models from brands with questionable quality control present major risks.

How are land managers to distinguish e-bike classes? Adding to the confusion, how will land managers be able to determine if an e-bike has modifications that put it into a different class? What will be the penalties for violating the rules the USFS sets for this? Illegal e-bikes that are motorcycles with pedals are a problem (such as the one Simon Cowell crashed on), modifications such as de-limiting are widespread, and outrageous kits from overseas are easily available. I know that USFS enforcement is already stretched thin, so the addition of these new problems will only tax enforcement staff even more.

Further, e-bikes present risks related to the fact that they reduce the physical barrier to entry for reaching deeper into the forests. With un-powered bicycles, there is a significant barrier to entry of trails, and that's the physical fitness of the rider. E-bikes reduce the required fitness of the rider to reach farther from roads. Because they have limited power storage, they absolutely can reach a point where the battery and motor simply make for a much heavier bicycle that becomes a problem for a less fit rider to remove from the forest in the event of battery drain or a mechanical/electrical failure. This scenario puts the rider at more risk. I see this as more of a problem with e-bike rentals (riders who overestimate their abilities and have a poor understanding of the capabilities of the e-bike they've rented) than with people who own one and understand the capabilities of the machine they own, but it's still a major issue to be considered.

This presents a case for limiting e-bike access to certain trails, and particularly frontcountry trails.

I do feel like gated USFS roads should permit broad access to e-bikes. I don't see any major considerations for preventing their use there. For that matter, I don't feel like gated USFS roads should prohibit bicycles at all, yet on some forests, this is the policy towards bicycles.