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Organization:

Title:

Comments: NOT "LOW SPEED"

E-bikes are not "low-speed" compared to hikers, equestrians or mountain bikers. A trail-user speed comparison study (<http://jimmymacontwowheels.com/how-much-trail-do-you-use-in-an-hour-a-trail-user-speed-comparison/>) concluded that hikers average 3 miles per hour, equestrians average 4 miles per hour, runners average 5 miles per hour, mountain bikers average 7.5 miles per hour and Class-1 e-bikers averaging 11.5 miles per hour. Class 3 E-bikes are substantially faster than Class-1. E-bikes would be the fastest trail user if allowed on multi-user, recreational trails.

NOT SAFE FOR THE DISABLED OR ELDERLY

E-bikes put disabled and older riders in vulnerable situations on natural-surface trails. According to the Federal Centers for Disease Control and Prevention, one in every five falls by an older adult results in serious injury, such as broken bones, a hip fracture or head trauma. Nationally, 55 percent of all unintentional deaths among American adults in 2012-13 were due to falls, according to the CDC. Unsuspecting older adults are unaware that E-bikes will have them navigating trails at, or above, the speed of a highly-skilled, highly-trained, experienced professional cyclist.

TRAIL CREATION

The power of an E-bike's motor allows its rider to easily leave established trails and forge through undisturbed foliage. A study funded by People For Bikes concludes, "This study does not, and should not be interpreted to represent consensus on the environmental impacts of Class 1 eMTB [e-bike]. Environmental impacts are only part of understanding how a new use, like eMTBs, on public lands may affect the environment, user management, and experiences for other trail users. Social and regulatory factors may be of greater importance in determining appropriate use and should also be studied."

INCREASED WILDFIRE RISK

Off-brand e-bikes, sometimes imported directly from foreign countries to consumers, may not have the fire safeguards or the quality-control standards of more sophisticated (expensive) e-bikes. And these companies have little concern for product liability. Unlike established brands (like Yamaha, Specialized, Trek and Cannondale), these bargain-basement brands can simply disappear the first time one of their products sparks a forest fire. Do-it-yourself e-bike projects, bicycles converted with e-bike kits and e-bikes from questionable sources are all welcome under your recommended changes.

NO MINIMUM AGE RESTRICTIONS

High-speed E-bikes put older riders at greater risk of falls and you need to address younger operators too. E-bikes remove the speed and distance limitations that a young park visitor would experience hiking or human-powered biking. A child (or group of children) on motorized vehicles will result in user conflicts on trails and increases the likelihood of environmental damage.

E-BIKES WILL CHASE OTHER USERS OFF THE TRAILS

Being surprised on a path by a Class-3 E-biker traveling at 25 miles per hour (28 is the actual top speed) will motivate hikers and equestrians to abandon the path for the refuge of a trail closed to cyclists. Opening paths to motorized activity benefits consumers who can afford the motorized vehicle while pushing non-motorized users (sometimes lower income individuals) off the path.

IMPOSSIBLE TO ENFORCE

Once you open trails to any class of e-bike, you are opening the trail to all electric-motorized bicycles. There is no

way for a park ranger to visually determine if the vehicle is within power and speed restrictions.

THEY BELONG

E-bikes belong in National Parks where other motorized vehicles are permitted. They do not belong on roads, paths or trails currently designated for non-motorized use.