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Comments:

The proposed rule change related to directing authorized officers to allow class 1 e-bike use where mechanized, non-motorized bicycle (regular bike) use is allowed on USFS land is affirmatively supported. The basis for this support is provided in the following section.

Speed:

A class 1 eBike is limited to 20mph which is less than what can be achieved on a regular bike. The latter can be accelerated to 30mph by pedaling only. Hence, speed cannot be brought forward as an argument against eBikes' use on USFS land.

Weight:

Modern eBikes exhibit a weight in the 45 pound range approaching the weight of regular bikes. Given the wide range of rider weight there is no significant total, including bike and rider, weight difference between eBikes and regular bikes. Hence, weight cannot be brought forward as an argument against eBikes' use on USFS land.

Impact on trails:

Given the typical use of wide tires for eBikes and a weight that is approaching that of regular bikes, the pressure impact on the ground is no worse from eBikes. In fact 10 years ago, regular bikes on 26" rims and 1.9" wide tires caused more trail erosion than today's eBikes with 27.5" rims and 2.5" wide tires. Hence, impact on trails cannot be brought forward as an argument against eBikes' use on USFS land.

Safety:

It has been argued that eBike riders might get lost in the back country since they are able to go longer distance due to their pedaling support. This seems to be hardly a valid argument as even motorbikes that rely entirely on motorized propulsion seem to be able to return safely on a regular basis. Surely eBikes with assisted support will not result in a relative uptick in backcountry emergencies. Hence, impact of relative emergencies cannot be brought forward as an argument against eBikes' use on USFS land.

Crowded trails and rights of use:

The idea that eBikes would lead to more people on USFS land, crowding out trails appears non justified. USFS land as a public entity benefits from taxes and, therefore its use should benefit all tax payers and not only those on regular bikes. eBikes are often used by older athletes to extend their active life. These people have paid taxes for decades and should be able to participate at the recreational opportunities their funds have help establish. Lastly, USFS lands seem to be vast and appear to have plenty of space to offer for tax payers' enjoyment. Hence, crowded trails and rights of use cannot be brought forward as an argument against eBikes' use on USFS land.

In summary, reclassifying class 1 eBikes such that they will be authorized just like regular mechanical bikes for use on USFS land has been overdue to keep up with recent technical advancements and need for public access for the benefit of all tax payers. There are no arguments why such a reclassification should not move forward.