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First name: Matt

Last name: Roscoe

Organization: None

Title:

Comments: I oppose any effort by the forest service to superimpose motorized forms of travel and recreation on non-motorized trails which are used by hikers, equestrians and others. My rationale for this stance include the following:

1. Recreational conflict: Class 1 and 2 ebikes travel at speeds of up to 20 mph, Class 3 ebikes travel at speeds of up to 28 mph. This represents a significant discrepancy to the 3mph speed at which people and horses are able to travel. So, the inclusion of ebikes on nonmotorized trails would lead to potentially negative impacts to other relatively slow-moving trail users. This would result in a loss of usability of some trails by some users due to conflict and/or safety concerns. This technological displacement, as some have called it, would lead to a situation where recreational users with new and more advanced forms of travel degrade and displace other more traditional users (i.e. hikers and walkers).
2. Safety: The rapid speeds that ebikes travel and their silent operation would create situations where significant public safety hazards are imposed upon public land users. This is true for both ebike users who commonly wear bicycle helmets that are designed to withstand only a 14mph collision as well as traditional trail users (i.e. hikers and walkers) who typically hike without any protective wear in anticipation of collision. Given the fact that these bikes are capable of rapid acceleration and maintenance of high speed, collisions are likely on trails not designed for long line-of-sight or room to pass safely.
3. Ecological integrity: The furthest one can get from a road in the continental US is 21.7 miles. Roads where ebikes can be used are already very available to these recreationists. Allowing ebikes on nonmotorized trails threatens the few remaining cores of wildlands left in our nation. These core nonmotorized areas serve as sanctuaries of wildness where wildlife and wild processes can continue to thrive relatively undisturbed. The effect of allowing ebikes to access these areas as nonmotorized users seems obvious: the disturbance posed by 28mph travel will threaten the sanctuary quality of these lands thereby threatening the survival of wild processes and wildlife.
4. Anticipating Future Technology-Assisted Access Claims: The consideration of ebikes as "nonmotorized" opens the door for a cascade of other technological-assisted claims to access. Consider, for example, the electronic snowmobile. These machines are available to the public and operate without the typical noise of gas engine powered models. Should these machines also be categorized as "non-motorized" simply because they are quieter? My point here is simple: non-motorized means without a motor. Both ebikes and electronic snowmobiles by definition have motors, that is, electronic motors. So, they should be excluded from consideration on trails where nonmotorized travel has been historically designated.