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Comments: E-bikes should be allowed on trails and roads designated for motorized use. E-bikes should NOT be allowed on trails designated as non-motorized, and most certainly should not be allowed in wilderness areas.

By the definition in section 7705 of FSM 7700, an e-bike is classified as "a type of MOTOR vehicle". The very definition should preclude its use on trails currently designated as non-motorized.

E-bikes should not be allowed on any non-motorized trails, including trails where bikes are currently allowed. FSM 7710, section 7715.5 paragraph 4 states "Consider designating a class or classes of e-bike use, as appropriate, on NFS trails managed for bicycle use or where bicycle use is allowed, where effects from e-bike use would be comparable to effects from bicycle use." E-bikes are not comparable to human powered bikes, by the very definition they are a motorized vehicle with greater torque, speed, and distance capabilities. Only a tiny fraction of e-bike users are the elderly or disabled desiring to access locations they could not otherwise. The overwhelming majority of e-bike riders are, and it is reasonable to believe always will be, perfectly able bodied riders. These riders will achieve 1) higher speeds which results in harder breaking and more pronounced washboarding which is an erosion and trail maintenance issue, 2) more torque on uphill sections increasing instances of loss of traction due to over-torqueing and the resulting wheel spin, again causing trail damage and erosion issues, and 3) a significant increase in the miles ridden by any given rider, increasing overall user miles and wear and tear on the trails even assuming (incorrectly) that there is no difference in wear and tear per mile ridden.

On currently designated motorized trails, the addition of e-bikes can reasonably be expected to affect trail wear and tear only nominally as the intended use of motorized trails (e.g. motocross) includes vehicles that have far more power than e-bikes.

Unless the Forest Service has a defined plan and funding set aside to address these increased deleterious effects, e-bikes should be limited to trails that are already designated as motorized. Knowing that trail maintenance in the Forest Service managed areas I ride (larger Crested Butte area, Buffalo Creek, Colorado Springs area, Durango area, Steamboat area) is almost exclusively carried out by volunteer organizations, I find it hard to believe the Forest Service has the funding necessary to address the increased wear and tear that would come with allowing e-bikes on trails currently designated as non-motorized. That would lead to an environmental effect, requiring NEPA to address.

To summarize, e-bikes should be treated like any other motorized vehicle, the fact that they are a 'bike' is irrelevant, they are motorized. They should be allowed anywhere that motorized vehicles are currently allowed. E-bikes should not be allowed anywhere motorized vehicles are not currently allowed.