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Title:

Comments: This comment is in regard to the Forest Service's consideration of allowing e-bicycles on non-motorized trails.

Several years ago when e-bicycles first began to appear I opposed their use on non-motorized trails. I was of the philosophy that these were not Mountain Bikes.

Then, I read several opinion pieces and industry documents that suggested that e-bicycles were not truly motorized and needed to be pedaled to produce motion. They were "e-assist" bicycles. The manufacturers and users argued that the speeds were low, and that they were no different in capabilities than regular human powered bicycles. User's argued that e-bicycles allowed disabled and aging riders to access single track trails without harming the resource.

For a time this argument resonated with me, and I was more tolerant of the e-bicycle advocates.

Now that e-bicycles are the norm, and regularly sighted, I realize I was right the first time. The e-bicycle is a motorized vehicle and does not belong on motorized trails. The speeds that are attainable by e-bicycles far exceed what any normal human can generate on their own. This endangers hikers, equestrians, and other cyclists. The e-bicycle is also significantly heavier than normal bicycles which will increase impacts on the trail tread. E-bicycles have much longer ranges with improvements in battery technology and will increase the ability of user's to venture further into the back-country. Do not think they will stop at wilderness boundaries.

Because they barely require any pedaling, e-bicycle users will be encouraged to ride in inclement weather that would keep most riders off of wet trails, because they can dress warmer and more water repellent. The e-bicycle user does not have to consider the resistance of mud or slippery tread as a human powered cyclist does.

Do not be fooled by the argument that the majority of e-bicycle users are disabled or aging. My own anecdotal experience has been that the main users are the motor-cross crowd turned to e-bicycle, or the weekend warrior, lift access downhill mountain biker now turning to e-bicycle. Both of these user groups desire the speed and ease of e-bicycles as an alternative to traditional human pedal power. The e-bicycle allows them easy access to the top of a hill so they can "rip" the downhill. From my humble experience these users tend to be less considerate of resources and other users.

Allowing e-bicycles on non-motorized trails would be a huge mistake. These are motorized vehicles. Period. Allowing them on traditional non-motorized trails would increase user traffic, increase speeds, increase user conflicts, and increase resource damage. These vehicles should be treated like other OHVs. If they are allowed to be used on NFS roads and trails they should be limited to specific OHV use areas, or specific purpose designated trails.

The reality is, I already see e-bicycles on NFS trails. These users are already ignoring trail restrictions, and will continue to do so. As the batteries and motors get smaller, e-bicycles will be harder to distinguish from regular human powered bicycles. As the batteries and technology improve these vehicles will press further into the back-country. I sincerely hope the USFS takes action to limit e-bicycle use on NFS trails.

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