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Comments: To Whom it May Concern:

I am writing in strong opposition to treating electric bicycles (e-bikes) the same as non-motorized bicycles on trails that currently only allow non-motorized travel.

As a resident of Deschutes County Oregon, I am an avid user of non-motorized trails on USFS land on a traditional bicycle - as are thousands of other people, both from the local area as well tourists from around the state and around the country. Most people here would agree that we already have an overuse of public lands here in Central Oregon without adding another user group. This policy would affect hundreds of miles of non-motorized trails on USFS lands throughout Oregon including Deschutes National Forest, Willamette Nation Forest, and Ochoco National Forest, just to name a few. By issuing such a sweeping policy to allow e-bikes on non-motorized trails, the USFS is completely ignoring existing travel management rules and regulations undermining the laws that protect human-powered recreation in the backcountry landscapes we enjoy.

Many of these areas already support a large user base and their maintenance falls on the shoulders of volunteer organizations - adding additional users that can both travel longer distances, and at higher speeds, will put significant additional stress on these natural resources, requiring substantially more maintenance. Given the fact that the proposed action expressly states that it will, "expand recreational opportunities for many people, particularly the elderly and disabled," it is unlikely that this new group of users will be capable of participating in required maintenance significantly enough to offset their increased wear and tear on our public resource. For more able bodied users, e-bikes will allow more distance to be covered either by allowing them to travel faster, or simply allowing them to travel further before exhaustion. Despite the fact that e-bikes have not been shown to put more stress on trails per mile traveled, they will allow many more miles to be traveled, which will ultimately wear and erode trail surfaces more severely than traditional non-motorized users have in the past.

While e-bikes are a very appropriate mode of travel on some public lands, they do not belong on non-motorized trails, because to put it simply, they have a motor - this simple fact indicates they should be regulated in accordance with existing travel management rules and limited to motorized trails and roads as they currently are. There are already thousands of miles of motorized trails and roads in Oregon as well as the rest of the American West that are already legally accessible to e-bikes. If any non-motorized trails are to be considered for e-bike use, the Forest Service should carefully analyze impacts to current users, wildlife and natural resources on a case by case basis before allowing e-bike designation. Bicycles already travel faster and quieter than people on foot - adding more speed without additional noise will only increase the impact on wildlife.

Furthermore, despite the fact that we in Deschutes County have a strong volunteer search and rescue organization, not all areas are that lucky. E-bike access on backcountry non-motorized trails may create situations where mechanical breakdowns, accidents or other emergencies far away from civilization put added strain on search & rescue organizations. Failing to account and plan for this will result in more severe injuries or deaths.

I appreciate the fact that you've sought public comment and sincerely hope that you weigh these points prior to making a decision.