Data Submitted (UTC 11): 10/15/2020 10:54:33 PM

First name: James Last name: McIlvain Organization:

Title:

Comments: I am opposed to allowing e-bikes access to roads, paths or trails currently designated for non-motorized recreational activity in U.S. Forest Service managed areas. E-bikes should be welcomed by The Forest Service in areas designated for motorized recreation. They should not be permitted to share areas with hikers, equestrians or bicycle riders.

- 1. Allowing any class of e-bike virtually opens the area to all electric-motorized bicycles. These "classes" overlook "do it yourself" electric motor kits attached to bicycles, engine controllers that digitally override speed limitations (a simple and popular modification) and electric-motorized bikes sold directly to consumers from foreign counties. A park ranger's visual inspection cannot determine an e-bike's class (or top speed).
- 2. E-bikes are not "low-speed."? E-bikes are high-speed compared to hikers, equestrians or mountain bikers. A Forest Service path has hikers averaging 3 miles per hour, equestrians averaging 4 miles per hour, runners averaging 5 miles per hour, mountain bikers averaging 7.5 miles per hour and Class-3 e-bikers averaging 16 miles per hour. Introducing this new user group to non-motorized areas will force other user groups off the trails and paths.
- 3. E-bikes place disabled and elderly riders in danger. ?Encouraging older or disabled riders to operate an e-bike on natural-surface trails (unpredictable surface conditions and far from medical assistance) is dangerous. The Federal Centers for Disease Control and Prevention says one in every five falls by an older adult results in serious injury, such as broken bones, a hip fracture or head trauma. Nationally, 55 percent of all unintentional deaths among American adults in 2012-13 were due to falls, according to the CDC. Electric motors permit disabled and elderly park visitors to navigating a trail or path at the speed of a highly-skilled, highly-trained, experienced professional cyclist.
- 4. E-bikes introduce a new fire danger to your parks. Anytime you have stored energy (batteries), there is a chance for combustion. Off-brand e-bikes, sometimes imported directly from a foreign factory to a consumer's home, do not have the fire safeguards or the quality-control standards of more sophisticated (expensive) e-bikes. And these companies have little concern for product liability. Unlike established brands (like Yamaha, Specialized, Trek and Cannondale), these bargain-basement brands can simply disappear the first time one of their products sparks a forest fire. Do-it-yourself e-bike projects are a serious fire concern.

Please limit motorized recreational vehicles to areas you have already deemed appropriate for motorized activity. Thanks for listening.