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First name: Lisa

Last name: Romano

Organization:

Title:

Comments: -I agree that it is important to define e-bikes as their own categories, and believe you have sufficiently defined those categories

-FSM 7715.03 - Policy: Statement #9 requires that new technologies be considered. I agree that e-bikes should be considered when making trail management decisions. I disagree, however, with the example you provide in statement that follows ('may provide new opportunities...'). This statement reveals a strong pre-decisional bias towards allowing e-bikes on trails and doesn't acknowledge the fact that there may also be good reasons to not allow e-bikes on nonmotorized trails. If you will require your recreation managers and people doing NEPA analysis to review and follow this manual direction, you should either remove this language or ensure language that points to the benefits of allowing e-bikes is equally balanced with language about the drawbacks of allowing e-bikes.

-FSM 7715.5 - Criteria: I think your logic is essentially flawed in that this proposed directive assumes there will be trails in which the effects of e-bikes will be 'comparable' to existing bicycle use. Given that e-bikes are designed to provide power beyond what even an elite athlete is able to do, any use of e-bikes is likely to increase the speed of travel (particularly going uphill), and likely the distance as well. Any increases of speed can have detrimental impacts on other trail users and on wildlife - high rate of speed combined with quiet activity means wildlife have little advance warning of what they perceive as a threat, which means their response is more likely to be a high-energy-output flee, rather than hiding. This is already a concern with mountain bikes and will be more of a concern if e-bikes are allowed in more areas. Because e-bikes will allow people to ride farther and faster on trails than they could on their own, I can't envision many scenarios where their use will be 'comparable' to mountain bikes (there may be individuals who choose to limit their speed, but you can't make management decisions based on assumptions of how some people might behave; the only true known is what new capabilities ebikes provide, which are consistent, enduring speeds up to 20mph).

For this reason, I believe the foundation of your criteria is flawed. At the very least, your criteria should include a requirement that the best available science specifically regarding ebikes and their effects on wildlife and other trail users be used to make trail management decisions; lack of available research doesn't qualify as evidence that there aren't effects. Also, when considering the potential for increased or concentrated use, decision-makers should also consider the likelihood that ebikes, while still prohibitively expensive for many, will become more affordable in time; thus, the level of interest in using ebikes today doesn't necessarily indicate their level of use/popularity in the coming years.