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Organization:

Title:

Comments: I am an 81 year old mountain biker who owns and rides both a pedal-assisted e-mountain bike and a standard mountain bike. Despite advanced age, my balance, reflexes, and ability to read trail and ride my intended line are uncompromised, and I find mountain biking to be an inspiring and uplifting form of recreation.

I ride both types of bicycles on the same trails, and I am keenly aware of the differences between them and the differences in the riding experience they each provide.

The modern mountain bike is an extraordinary technical achievement. It is clear that e-mtb makers, for reasons that are obvious, do everything they can to make their e-mtbs ride and handle as much like standard, non-pedal-assisted mountain bikes as possible. For me, the only really significant difference between the two types of bikes is that the e-mtb enables me to do steep technical climbs that are impossible for me on a mtb without pedal assist. The e-mtb bike gives me back the legs I had 50 years ago, and that is really all that it does. On mostly level ground and on downhills I feel that both bikes provide riding experiences that are very similar. I enjoy the challenge of getting my standard mountain bike up technical sections, but it is quite clear to me that under conditions of steep climbs that require great physical strength, pedal assist provides a riding experience that is both more enjoyable and safer.

My e-mtb bike weighs 16 pounds more than my standard mtb, a difference when combining the weight of bike and rider of 7%. This weight variation is overshadowed by the magnitude of differences in body weight among riders. I have not been able to observe any difference in the impact of the different types of bikes I ride on the trail or on the environment generally. In my experience, the only tire damage to trails I have observed has been caused by riders locking up their brakes and sliding the tires on downhills. By far the greatest damage to trails I have observed has been from erosion due to rainfall run-off, and in my area this type of damage is vastly greater than any damage caused by trail use.

I also find the alarmist statements of some commenters regarding the riding behavior of e-mtb riders to be speculative and completely at odds with my experience and with the motivations and behavior of other e-mtb riders I know or have observed on the trail. I think it would be accurate to say that every e-mtb rider I have encountered just wants to turn back the clock and get his younger legs back so he can have a more enjoyable outing. I believe the notion that e-mtb riders might be less respectful of other trail users or prone to use poorer judgment than other riders is not supported by reality.

The U. S. Secretary of the Interior issued Order No. 3376 on August 29, 2019 which established the policy of permitting pedal-assisted bicycles everywhere on Federal Lands managed by the Department of the Interior where other (non-pedal-assisted) bicycles are permitted. In doing so they laid out their reasoning and provided a lucid and sensible rationale for their decision.

I truly believe that the Forest Service could provide a great service to older riders like me and to riders with physical limitations from injury or other causes by adopting the policy of the Department of the Interior with no harm resulting to National Forest trails as a consequence. While the land management issues faced by the Forest Service are not the same as the National Park Service, an appreciation of Interior's reasoning should certainly prove useful. If the Forest Service believes a more conservative approach would be prudent, they could design trial programs permitting Type 1 pedal-assisted mountain bike access on selected trails that are not presently over-trafficked and not currently under-maintained, observing results and documenting outcomes. Try it a little bit and see what happens, but try it!

Riders attracted to e-mtbs are not seeking a riding experience that is different in any significant way from other riders, nor are e-mtbs capable of providing such an experience.