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Comments: Speaking as a fan of E-bikes, I do not think that any class of E-bike should be allowed on non-motorized use trails. E-bikes have a motor, and therefore reduce the amount of physical effort a user needs to put into using the trail. Removing the barrier of physical exertion will vastly increase the number of people using a given trail, meaning there will be more trail damage. We already have many non-motorized use areas that are getting "loved to death" where overuse is causing major maintenance and rubbish issues.

Typically, the type of people who are willing to put in the physical effort required to enjoy the trail are more likely to respect the trail and surrounding lands - they will be stewards of the trail, following stay-the-trail and leave-no-trace principles. Removing the physical-effort aspect of trail use will attract a wider range of people, and there will be a higher percentage of trail users who will not respect the trail as a result.

Additionally, there is the significant issue of trail access. Many trails incorporate land-use agreements from adjacent private landowners or municipal areas. Ebikes were never considered in the land-use agreements or trail easements. Private landowners and other stakeholders that tolerated the level of monthly visitors associated with non-motorized trail use may not tolerate the significantly increased level of monthly visitors if those same trails were also opened up to e-bikes. For many trails, it took many years of negotiation with stakeholders to open up trails for human-powered mountain-bike use. The mountain biking community had to work very hard to open up various trails to bike use that were previously hiker-only, often to staunch opposition. There are many examples of trails being closed to bike use due to perceived overuse, trail damage issues, or the interaction between cyclists and hikers on a narrow trail. It is highly likely that motorized e-bike trail use and muscle-powered mountain bike trail use will be viewed as one-and-the-same by the general public, and so increased trail use brought on by the allowance of e-bikes may have an adverse effect: many of the trails that the mountain bike community fought so hard to open to mountain bike use may end up being barred to mountain bikers due to the allowance of e-bikes.

Please do not create a grey area in the definition of non-motorized use by allowing motorized e-bikes on non-motorized trails. Non-motorized should continue to strictly mean all effort involved in using the trail derives directly from muscle-power.