

Data Submitted (UTC 11): 10/21/2020 10:48:32 PM

First name: Erma

Last name: Lewis

Organization:

Title:

Comments: Forest Service's Proposed E-Bike Rule Threatens National Forests, Wildlife, and Wilderness

The U.S. Forest Service is proposing to open up more trails in our National Forests to electric bikes, or e-bikes, through a new rulemaking process. The proposal has huge implications for wildlands, wildlife, and Wilderness on more than 150 million acres of your public lands, so it's important to speak up before the 10/26 public comment deadline!

E-bikes utilize an electric-assist motor to propel the bike forward, in addition to having pedals. E-bike use has taken off in recent years, and new technologies are now being developed to manufacture e-bikes that can drive up to 55 mph.

Unlike the Interior agencies' (National Park Service, Bureau of Land Management, and Fish and Wildlife Service) earlier proposed rulemakings, the Forest Service proposes to continue classifying e-bikes as motor vehicles, which is good. However, we're concerned that it appears that the reason for the rule is to allow e-bikes on non-motorized trails in the future because the agency is treating e-bikes differently than other motor vehicles. That could conflict with the agency's own Travel Management Rule and has the potential to impact the environment, so the agency should analyze such a proposal under the National Environmental Policy Act.

For far too long conservationists have ignored the threat that mountain biking poses to wildlands, wildlife, and Wilderness. Research shows that like all recreation, mountain bikes displace wildlife, and because they travel farther and faster than hikers or equestrians, they can impact a much greater area in the same amount of time. E-bikes can travel much farther into the backcountry in less time, and startle and disturb wildlife over far greater distances. E-bikes also conflict with nonmotorized trail users like hikers, horseback riders, and bicyclists.

But beyond these direct impacts to nature, a significant segment of the mountain biking community has become one of the most ardent opponents of wilderness designation and, more significantly, is pushing to open existing Wildernesses to bikes. That will presumably include e-bikes if they're eventually allowed on non-motorized trails on public lands.

Please ask the Forest Service to withdraw this proposal. Comments are due 10/26.

Submit your comment

Please write in your own words, but consider including the following points:

I oppose the Forest Service's proposed rule to open up my National Forest lands to additional e-bike use for the following reasons:

E-bikes must continue to be treated as motor vehicles, not bicycles. New e-bikes are being developed now that will drive up to 55 mph. E-bikes must travel only where motor vehicles are allowed.

This proposed rule suggests likely environmental impacts that should be fully evaluated through an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA).

The proposed rule appears to set up conflicts with the Forest Service's Travel Management Rule (36 CFR 212 et seq).

Because of their speed and quiet nature, e-bikes can travel much farther into the backcountry, and startle and disturb wildlife over far greater distances. E-bikes also conflict with other nonmotorized trail users like hikers,

horseback riders, and bicyclists.

Because there is almost no enforcement now for trespass, illegal off-trail riding, and illegal trail development by some bikers, e-bikes will increasingly trespass into Wilderness and other protected areas with no consequences. This illegal use will degrade the wild character of these lands and should not be encouraged as this rule will do. The Forest Service should withdraw this proposal.