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Title:

Comments: I write to express my strong opposition to permitting the use of e-bicycles on trails designated for non-motorized use in the wilderness areas of our national parks. I have seen the damage caused by non-motorized bicycles on trails and been concerned about the destruction caused by these non-motorized bicycles, so there can be no doubt that permitting e-bikes to use these trails would result in far greater damage to the wilderness and create serious safety concerns for all other users of the trails. I have been surprised and felt threatened by mountain bikers moving a great speeds along trails, so again, e-bikes will only intensify these dangers. The entire proposal fails to recognize the intent and value of trails open only to those who move quietly and respectfully through the wilderness with a recognition of the privilege of being able to experience nature without the domination of place by human presence. This is important not only for those who wish to enjoy nature but also important for the integrity of the wilderness for all the other species that depend upon and partake in the unviolated nature of the place.

E-bikes are motorized vehicles and so must continue to be treated as motor vehicles, not bicycles. Clearly e-bikes are capable of going at speeds far beyond those possible for un-motorized bikes and thus do not make any sense on non-motorized trails, both because they pose risks to other trail-users and because they are far more destructive. E-bikes must travel only where motor vehicles are allowed.

The consequences for the environment of allowing e-bikes as the proposed rule suggests must not be permitted and certainly must be taken seriously and must be fully evaluated through an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA).

It is also alarming that this proposal is even being considered for all the reasons mentioned above but also because it conflicts with the Forest Service's Travel Management Rule (36 CFR 212 et seq).

I am also gravely concerned that these bikes introduce a new level of threat to the integrity and safety of the wilderness areas: because of their speed and relatively quiet motors, e-bikes can travel much farther into the backcountry, and startle and disturb wildlife over far greater distances.

There is the additional danger that 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. This also represents a far greater threat for conflicts with other non-motorized trail users.

The Forest Service should withdraw this proposal.