Data Submitted (UTC 11): 10/22/2020 5:16:04 PM

First name: Jamaka Last name: Petzak Organization:

Title:

Comments: 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.