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Comments: I wrote another letter almost a month ago about my firsthand experiences over two seasons riding my class 1 eMTB in Colorado under their state ebike law, vs. riding my acoustic mountain bike on similar USFS trails. I included GPS average moving speeds for both. The tl;dr is, my ebike is about 2 mph faster, including climbs and descents. 8-9 mph average moving speed per my GPS.

That's what all the fuss is about, 2 mph. Since then I have read hundreds of letters here, many from older people asking to be allowed to ride class 1 ebikes in USFS away from high speed gasoline powered vehicles.

People who oppose ebikes on non-motorized trails seem to break down into these groups:

- 1. Hikers and horse riders who believe ebikes do now or will in the future run at extremely high speeds, spooking horses and colliding with hikers.
- 2. Regular mountain bikers, who believe being passed by an ebike somehow diminishes their feeling of accomplishment when they climb a hill unassisted, aka "cheating".
- 3. Conservationists with little knowledge of ebikes, who fear they will harm the environment more than regular bikes with loud noises, dirt bike-like powerful motors ripping up trails, and extremely fast speeds disturbing wildlife.

I've seen several suggestions here to slowly open trails one at a time to class 1s under the discretion of local USFS managers, but I believe that would expose every local ranger district to individual lawsuits, which would have to be defended by costly legal teams individually as just happened recently in Tahoe National Forest. Any local ranger district would be vulnerable to pressure from a small letter writing campaign and threats of a lawsuit by any local conservation club. Write two dozen letters, and those ebike signs would just never go up. Not worth the hassle to districts with limited budgets.

So I believe there should be a limited national policy for class 1s by USFS.

My suggestion: Issue an order to open all current USFS mountain bike trails to class 1 ebikes for riders over 50 and younger people with disabilities. Immediately provide an address for younger people with disabilities to write in with notes from their doctors and documentation of their conditions. Begin working through them by whatever medical doctors USFS has on staff, and sending out individual ebike permit letters.

I am almost 60 and still (barely) able to climb with my regular mountain bike, but not for much longer. I chose 50+ because that is the age of many people who wrote in here asking for ebike access because of their age, and also when many people begin to develop coronary artery disease (heart attack and stroke risk), high blood pressure, diabetes, arthritis, joint injuries, and many other conditions. I would not recommend pushing the age for ebikes out to 65 or 70 based on my experience, because I crashed many times as a beginner, much less now. You need to let people learn mountain biking when they are still young enough to weather a few scrapes.

MTBProject.com has green/blue/black difficulty ratings to keep older beginners from throwing themselves off steep mountains as has been suggested (disingenuously?) by some younger regular bike riders here. Being 50+ and buying an ebike doesn't suddenly make you a fool. You shouldn't have to be 22 to learn something new. Treat your seniors as the adults they are. Why isn't anyone worried about older equestrians losing their horses deep in the back country and "putting too much strain on search and rescue"? They don't have to pedal at all!

Again, probably another disingenuous concern.

Also, in my experience USFS trails go UP practically from the parking lot, with rocks everywhere. They're not flat and smooth for miles and miles, THEN get dangerous, aka "technical" as some have suggested here. I'm sure some trail somewhere is ten miles of green then suddenly black, but it's not my experience.

Anyway, back to permits. Not requiring every single older person to document their health status would allow them trail access at the beginning of the 2021 season, and allow case by case processing of permits for younger disabled people much faster with limited resources. 50+ people would only need to carry an ID to show to rangers.

Here are the mitigations for the summarized ebike concerns above:

- #1: Descents are when both ebikes and regular bikes hit maximum speed for the day, not climbs. Older people on ebikes are less likely to use Strava and "hotdog" downhill at unsafe speeds. The speed of my climbs on my ebike are close to the same climbing speed on my regular mountain bike on rough trails because I have to navigate the bike over rocks. I only need the pedal assist to keep my heart rate at a safe level on climbs.
- #2: If you are passed on a climb by a slow, grandfatherly appearing person who probably would not even be able to ride that trail without an ebike, it is no insult or diminishment of your ability or accomplishments, any more than you envy someone queuing in a wheelchair because he has a place to sit down. Be happy for them that they can still get out and ride a bike in these difficult stressful times.
- #3: Limiting ebike riders to 50+ would get the numbers down, and limiting the bikes to class 1 would keep the speeds down. Also I wrote in my other letter, the speed of the back wheel on a class 1 ebike is LOCKED to the pedal speed. It can't spin out, "roost", on a climb or go any faster than the rider can pedal. There is an upper limit to how fast a class 1 ebike can go even if somebody cheated and hacked an illegal motor into it, because the front chain ring would have to be the size of a pizza and drag on rocks to move the back wheel that fast. All the ebikes I have seen or ridden are quieter than knobby tires running on pavement.

Rangers would only have to inspect the bike to make sure there is no throttle, which would require little training. My state and other states require a "class 1" (or 2 or 3) sticker on all new ebikes sold.

Comparing this season to last season, the busiest trail network I regularly ride on my regular bike, Happy Jack in SE Wyoming, is deeply eroded this season by the increased bike traffic. Some places are like troughs filled with a few inches of sand. It wasn't like that before. Everyone has seen in the news, bike shops are selling out and used bikes are selling for high prices. People need something to do during the pandemic, and many are choosing bike riding. But don't blame that on ebikes. I've been riding there since 2016 and have only seen one ebike in that time, and I know what ebikes look and sound like. That damage was done 99.99% by regular mountain bikes. There are just more of them this year.

I'm not in favor of opening trails one at a time over many years, and battling lawsuits one by one, but I would support local trail managers having the discretion to close some very heavily used trails to ebikes outside urban areas like Boulder if necessary, but I think they should have to justify that to USFS with data, otherwise again, they are vulnerable to pressure and threats of lawsuits at the local level from small conservation groups.

Thank you again, for reading my letter.