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First name: Misty

Last name: Haji-Sheikh

Organization:

Title:

Comments: I live in the Spring Mountain National Recreation Area (SMNRA). I frequently hike the trails in the SMNRA and other locations in Nevada. The proposed language calls for designations for 3 different kinds of E-Bikes. The intent of these documents is to allow more people to be using the trails.

7702 - Objectives "8. To consider emerging technologies (such as e-bikes) that are changing the way people access and recreate on NFS lands. For example, where suitable for use, e-bikes may provide new opportunities for individuals who might otherwise be prevented from experiencing an NFS trail without assistance from an electrical motor".

I feel this ruling falls short in several areas.

First, how would a person or even a law enforcement officer (LEO) know which of the E-Bikes they are looking at? There are E-Bikes that look like street bikes (think 10 speeds) and E-Bikes that look like mountain bikes. Is it possible to know at a glance the difference between a Class 1 E-Bike and a Class 2 E-Bike? Or a Class 1 E-Bike and a Class 3 E-Bike?

Let me give you a possible example. You have allowed Class 2 E-Bikes, but not Class 3. A person sees an E-Bike on a trail and calls LEO to report it. [Note: in the SMNRA there are many jurisdictions including USFS, Bureau of Land Management, Nevada Highway Patrol, Nevada Department of Transportation, Metro Police Department and others] When dispatch or the LEO asks where and what type of bike it was. The citizen says that they were hiking with their kids ages 6, 8, and 10. The citizen was worried that a Class 3 E-Bike was on the trail moving quickly. Even if it was a Class 1 that was allowed, this type of call will take up time for the LEOs. I would hope that if that same E-Bike were being driven in a manner that was dangerous or driving off the trail, that there would be a citizen complaint.

What about E-Bikes that are being driven on roads? Non-E-Bikes can ride on road and currently so do E-Bikes, but some types of motorized vehicles, dirt bikes and mini motorcycles, cannot. For example, mini motorcycles are described here:

Kids as young as 3-years-old can start on small electric dirt bikes and can safely ride a gas-powered 50cc dirt bike at age 4 with training wheels. At age 5 or 6, they can be zipping around without training wheels and even taking small jumps on real dirt bikes."

Will there be clear signage that alerts citizens to what is allowed. There are currently rules that state where motorcycles can be ridden - streets are allowed, but not trails and in some areas not off road. In the SMNRA, often there are motorized vehicles that go off road and cause damage to the fragile ecosystem, the flora, fauna and even the soil. There is currently little to no signage.

7703 discusses the jurisdiction over the roads and trails. Are you aware that the USFS has only 2 employees to oversee nearly 500 square miles?

Currently the SMNRA has up to 2,000,000 visitors a year, which is approximately 40,000 between Friday and Sunday of most weeks. Dividing this out it could be 1,000 people per trail on those days. The trails are steep, rocky, and narrow with a 15% to 20% grade. Many people that would ride an E-Bike would not have the strength to ride on grades steeper than a 5%-6% grade. It takes a good deal of strength to ride an E-Bike up a higher percent grade and even greater strength to go downhill because of the braking that is required. And what about the speeds the E-Bike would be going down a steep trail. The speed acquired could well exceed the E-Bike governed speed of 20-28 mph. Plus there are no posted speed limits on the trails!

What about a person riding an E-Bike that gets injured? The trails are not all along the roadway. The first responders might have to travel 10-20 miles to get to an injured person and helicopter rescue may be necessary. Even a non-injured person may need rescuing. E-Bikes also run out battery power. A Class 1 would have to be pushed or the person would have to be rescued. A Class 2 or 3 could be ridden, but that leads to two problems.

1) E-Bikes are heavier than non E-Bikes and 2) if the person needs an E-Bike due to their inability to walk, then pedaling it would be out of the question and in all of these cases a person would need to be rescued. [Note: I

refer you back to 7702 "... where suitable for use, e-bikes may provide new opportunities for individuals who might otherwise be prevented from experiencing an NFS trail without assistance from an electrical motor.]"

Can these E-Bikes be ridden at night? The first responders may need to rescue people at night. The SMNRA has wild animals including mountain lions, wild horses, wild burros, bighorn sheep, elk, foxes and many more animals that come out at night. The trails are not well marked, and it is possible to get to an area that has steep cliffs by following the trail. I would not like to see someone fall off the trail - the drop could be 1,000 feet.

If properly done, lower Kyle Canyon for example, could be for E-bike use. There are dirt roads, trails, and possibly dispersed camping opportunities in the lower Kyle - and lower Kyle is significantly safer than the upper Kyle Canyon. Lee Canyon has similar needs and issues.

The Americans with Disabilities Act (ADA) says to make accessibility whenever possible. For example, a business that has steps to get in the front door needs a ramp. This ramp often needs handrails, anti-slip grooves and even bumps at the bottom for the visually impaired. I do not think that the ADA is necessarily what the Chapter Management changes [see 7702] are aiming at. If you are planning to use the ADA as the reason for these changes, it will be extremely difficult and costly to implement as Nevada has many wild areas. If you did not know, Nevada has more mountain ranges - 150 named mountain ranges - than any state in the US. If ADA is the reason for making these changes, then would not you need ramps, handrails, or other accommodations to make all areas for E-Bikes safe and in compliance. A better way would be to really limit where E-Bikes can and cannot go.

The USFS, Humboldt-Toiyabe National Forest in the SMNRA is currently taking applications (due by November 13, 2020) in the Prospectus for Opportunity for Outfitting, Guiding and Recreation Event Services that specifically names "motorized opportunities" - including E-Bikes.

I request that you please look very carefully at these areas I listed and consider changes that will protect hikers, the environment, and not add to LEO or First Responders duties.