

Data Submitted (UTC 11): 10/24/2020 11:53:54 PM

First name: Christopher

Last name: Lish

Organization:

Title:

Comments: Saturday, October 24, 2020

Director

Recreation Staff

1400 Independence Avenue SW

Washington, DC 20250-112

Subject: Reject the Proposed E-Bike Rule Which Will Threaten National Forests, Wildlife, and Wilderness -- Forest Service Manual 7700 Travel Management; Chapter 7700, Zero Code; Chapter 7710 Travel Planning

To National Forest System Associate Deputy Chief Tina Johna Terrell:

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

1) E-bikes must continue to be treated as motor vehicles, not bicycles. They use an electric motor, rather than a gas-powered one, to propel the bike forward and should not be considered equivalent to human-powered bicycles. New e-bikes are being developed now that will be able to achieve speeds of up to 55 mph. E-bikes should only be allowed to travel where motor vehicles are allowed.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

2) 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).

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

"In permitting the sacrifice of anything that would be of the slightest value to future visitors to the convenience, bad taste, playfulness, carelessness, or wanton destructiveness of present visitors, we probably yield in each case the interest of uncounted millions to the selfishness of a few individuals."

-- Frederick Law Olmstead

4) 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. I have observed that there are many more dead animals on and along trails that are open to bicycles; if e-bikes are permitted on trails, there will be an increase in trailkill.

5) Their presence adversely affects existing passive recreational use, especially hiking and bird-watching, activities which are engaged in by those who are seeking a quiet, contemplative, non-motorized and non-mechanized experience and who are disrupted by a machine racing by. Because of their speed and quiet nature, e-bikes will also conflict with other non-motorized trail users like horseback riders and bicyclists.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish--indeed, all the living creatures of prairie and woodland and seashore--from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- Theodore Roosevelt

6) 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 nor permitted as this rule will do.

Again, I strongly oppose the proposed rule by your agency to open up my federal public lands to e-bike use and urge you to reject this proposed rule.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA