

Data Submitted (UTC 11): 10/25/2020 8:16:05 PM

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Title:

Comments: Please consider this message as our comment on the proposed rule about electronic bicycles. We oppose the rule for the following reasons.

I have traveled many miles on a conventional three-speed bicycle, and I understand what they can do. They are capable of travel on paved or graveled surfaces or on natural surfaces such as dirt or rock. However, if a trail on dirt surface was wet after a rain, my bike sometimes would leave a rut a half-inch deep. For that reason, park authorities in Maryland urge visitors not to go biking on our state park trails during the first day after a rain. This problem is intensified by e-bikes, which are heavier and would leave a deeper rut. If many e-bikes travel on a wet, muddy trail, they will essentially ruin the trail. Rebuilding the trail would cost the Forest Service money. Our Maryland Park Service has a year-round trail crew dedicated to maintaining the trails in Patapsco Valley State Park, where they are heavily used by bicycles.

By reducing the physical effort needed to travel steep trails, e-bikes can lead people to ride farther from the trailhead, into more remote areas of wildlife habitat such as wilderness areas. This would reduce the value of these remaining wild lands as habitat for wildlife species that depend on remoteness from developed areas.

The Forest Service now has very little ability to enforce against illegal off-trail riding. E-bikes will be likely to trespass into wilderness areas, where they are prohibited, without any fear of being caught and prosecuted. This would certainly impair the wildness of these lands and spoil the visits of many people who went there for a wilderness experience or for a quiet hike in the back country.

The Forest Service should consider allowing e-bikes only on a site-specific basis, after analyzing the specific site in a specific national forest and after reviewing environmental impacts as required by the National Environmental Policy Act through an EA or EIS. The analysis should look at whether there is a need for e-bikes, whether they would interfere with wildlife habitat values or interfere with other visitors who come to the national forest to observe wildlife or to engage in other quiet forms of recreation. Would the impacts against wildlife and wildlife habitat be acceptable? Would the the physical impacts on the trail be acceptable? (Does Forest Service have the money to repair damage caused by heavier bikes?) A public review and comment period of at least 60 days should be provided for each proposed trail or trails, and that comment period should be in a season when the area is accessible to people who want to examine the routes for themselves before submitting comments.

The Forest Service should continue to be treat e-bikes as motor vehicles, not bicycles. New e-bikes are being developed now that will drive up to 55 mph. E-bikes must travel only where motor vehicles are allowed.

For these reasons we urge the Forest Service to withdraw this rule.

Thank you for considering our comments.