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Comments: Theoretically, I am in favor in increasing accessibility to trails, and the idea of allowing e-bikes in certain situations; I find several pieces of this decision specifically problematic:

1. Studies have shown that of e-bike users only '28.7% reported having a physical limitation that makes riding a standard bicycle difficult,' and 81.6% agreed that 'on average, I ride faster than I would on a standard bicycle.' (Portland State University Transportation Research and Education Center, 2019)

2. Allowing e-bikes to be classified alongside standard mountain bikes is a threat to mountain bike access. As expressed above, while similar, e-bikes DO go faster than standard bicycles in many cases. Having e-bike access rules follow that of mountain bikes threatens mountain bike access, 'as future decisions regarding whether or not a trail should be open to mountain bikes will necessarily have to take into account that e-bikes will have to be allowed access as well' (Michelle Markel, supportpubliclands.com).

3. 'Once an area has been naturalized to motor vehicle use, it is automatically disqualified from consideration for future protection as a federally-designated wilderness' (Michelle Markel, supportpubliclands.com). With the current state of controversy with e-bikes' consideration as motor vehicles, the prospect of that consideration disqualifying potential future wilderness areas is absolutely a step in the wrong direction. We need to protect our natural areas from accidentally losing this potential level of protection over shifting qualifications and loose definitions.

Perhaps, if the reasoning is to allow greater accessibility to trails, some type of permit system (such as that of Service dogs - i.e. if the e-bike's purpose is to grant you access where you could not have it before, you could be approved for e-bike use, you could take for example an e-bike safety and trail ethics class, and be issued a license or permit).

Protections should also be put in place, then, while allowing these permit-only e-bikes to use trail systems, ensuring that 1. future considerations will NOT be able to reference e-bike use as grounds for disqualification from federally-designated wilderness status, and 2. mountain bike approval must not be explicitly tied to e-bike use. Perhaps by default if an area is open to mountain bike use e-bikes would be allowed, but an area may still be able to disallow the use of e-bikes and protect that of mountain bikes in certain cases (for example that which mountain bike usage is already 'fast' pushing the edge of dangerous, or where mountain bike usage status may already be threatened.)

Thank you!