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Organization:

Title:

Comments: I am commenting on the e-bike document 7710. E-bikes are motorized - they should NOT be allowed on all trails where non-motorized bicycles are allowed - they should ONLY be allowed on very specific (and few) trails where non-motorized bicycles are allowed AND trails that do not have quiet user qualities such as remoteness, quiet, solitude, and wildlife. Class 2 and class 3 e-bikes should not be allowed on any trails.

In 7715.5 Section 4. Specific Criteria and Guidance for Designating E-Bike Use on Trails: I believe that bicycle (non-e-bike) impacts are very different from e-bike impacts. Direction to consider the following e-bike impacts needs to be included in this section:

- 1) Only allow class 1 on some very specific natural surface (dirt) trails. Class 3 bikes should not be allowed on non-paved trails at all - they are too fast. I also believe that Class 2 bikes should not be allowed on non-paved trails either - they are the throttle type and do not require any pedal assist. If only Class 1 e-bikes are allowed then there is an implicit speed limit of 20 mph.
- 2) Safety: Passing speed considerations - e-bikers need to slow down to 5 mph within 30 ft of other pathway users AND animals on all trails.
- 3) Noise: noise is not insignificant - it is described as high-pitch whining (often from bearings), and it increases with speed, motor age, and motor wear-and-tear. I have seen comments that you might not notice the noise in traffic, but it sounds like you certainly would on a quiet trail. The quiet user experience should not be destroyed. In addition, the relative quietness of e-bikes relative to dirt bikes is a problem for wildlife - e-bikes will startle/stress wildlife more than dirt bikes because they will get closer before they are heard but they can still travel fast.
- 4) Ease of access to more remote areas by more users needs to be considered. The quality of the quiet user experience in terms of solitude, quietness, peacefulness, and remoteness needs to be considered. It should be hard, not easy, to get to remote areas. They lose their remoteness qualities (solitude, quiet, wildlife) if everyone can get there- they are only preserved precisely because everyone can't get there.
- 5) Trail sustainability: E-bike usage is less appropriate on steep trails (e-bikers will just use the motorized assist and destroy the trail. This already is a concern with mtn bike trails - e-bikes would just exacerbate the problem.
- 6) Wildlife: Wildlife will be startled and disrupted by the noise as well as speedy approaches.
- 7) E-bikes should NOT be considered as similar to non-motorized bicycles for any analysis purposes. E-bikes are motorized and thus open up completely different aspects that need to be considered.

To summarize for 7710 section 4: Class 1 E-bikes should only be allowed on a few trails that are "not for quiet users". E-bikes are motorized - they should not be allowed on all trails where non-motorized bicycles are allowed - they should only be allowed on trails where non-motorized bicycles are allowed AND trails that do not have quiet user qualities such as remoteness, quiet, solitude, and wildlife. Land managers should be given significant leeway to consider particular local terrain, vegetation, wildlife, and especially the quiet user experience in decisions about e-bike usage.

Section 7715.72 also needs modification. That section says that routes crossing boundaries need to be coordinated to provide continuity of recreation experiences. Where I live (in Ouray County Colorado) there are significant differences in how/where (non-motorized) mtn bikes are allowed across the boundary between the San Juan NF and the Uncompahgre NF - the San Juan NF is almost ludicrously lenient about mtn bike travel (and there is much alpine and trail damage to prove it). The managers on the Uncompahgre NF side should not be forced (in fact they should strongly resist) any attempt to allow continuity of usage. Section 7715.72 needs to allow managers to have local priorities and resource protection take precedence over decisions in adjoining jurisdictions.

Thank-you,  
Jennifer Cram