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Comments: It is easy to assume that an e-bike is not too different from a mechanical bike. They both provide a bipedal means of getting from one place to another that doesn't involve pedestrian or vehicular travel. Both rely on similar componentry and are built and sold by common vendors. The unknowing spectator may not even be able to tell them apart for they can so closely resemble each other.

Many have found e-bikes to be a suitable alternative for their daily commute. Some pick up the kids from daycare, maybe a hundred pounds of groceries too, then whiz home with mechanical and electrical advantages on their side. This is fantastic. It keeps them out of a car and may ameliorate rush hour traffic in some communities.

Allowing e-bikes on natural surface trails, however, has been a much more contentious proposition.

Arguments for opening wildland trails and public lands to e-bike use commonly include the fact that electrical propulsion assistance reduces key barriers to the sport of mountain biking. In short, e-bikes make pedaling uphill drastically easier. Grandpa can keep up with junior, and those with disabilities are no longer left behind. In fact, secretarial order #3376 states the intent "to increase recreational opportunities for all Americans, especially those with physical limitations."

If only there was a way to ensure e-bike use on public lands is duly limited to persons over 60 years of age or with debilitating disabilities. There is a major problem with this. How on earth will land managers and district rangers possibly police the use of e-bikes within their jurisdictions? Who can tell the difference between a tier 1 e-bike and a tier 3 e-bike from a distance? What will prevent those who do not need an e-bike from abusing the privilege? Do emergency first responders even support the idea of enabling the elderly and those with disabilities to get deeper into the woods and farther from the trailhead where it is more difficult to perform a rescue? This doesn't seem very well thought through. If the argument for e-bikes is one of accessibility, will there soon follow a directive to reduce all grades on sloped trails to 3% and remove all rocks larger than a grapefruit?

Another common argument is that e-bikes are no more impactful to trails and trail user experience than traditional bikes. Where is the data to support this? When the challenge of the climb is removed, there's nothing left to discourage someone from lapping the trails all day long, thereby compounding the effects of high volume traffic on trails, many of which are already undermaintaned and crowded with users. Are our trails prepared for an onslaught of additional use? A methodical study of e-bike impacts could better inform the decision to allow broader use of e-bikes across public lands. It will always be easier to open the floodgates than to walk back a decision that turns out to have long-term consequences that aren't immediately recognized.

Finally, it must be pointed out that one thing definitively sets an e-bike apart from a traditional bicycle: an e-bike relies on an electric motor for propulsion. This sounds obvious, but an e-bike is inherently a motorized vehicle, and therefore extreme caution should be taken before permitting these motorized vehicles to travel on designated non-motorized trails. It is a slippery slope that may lead to all sorts of unwanted use on public lands.

The USFS should reconsider the notion to hastily open our forest lands and trails, particularly those designated for non-motorized use only, to e-bikes until the impacts and potential long-term ramifications of such a decision are better understood.