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Organization:

Title:

Comments: Subject: Proposal to permit the use of e-bikes on public trails within the National Forests and on other public lands.

Dear Forest Service:

I strongly oppose the Forest Service's proposed rule to open up our National Forest mountain bike trails or other trails to additional e-bike use for the following reasons:

E-bikes, regardless of class designation are still motor vehicles, not bicycles and they should continue to be treated as such. These devices may look similar to mountain bikes and they may have pedals like a bicycle, but having an electrical motor makes them motorized vehicles. I believe that a definition of e-bike must stress that this device is "motorized", not just that it has a 750 watt motor. Also, I feel that statements within the Forest Service travel plan that e-bikes are just electrical mountain bikes, is misleading. In the FS proposed plan it even says "Electric Bicycle (E-Bike)...a type of motor vehicle..." in the definition for an e-bike. Besides that, there are new e-bikes under development now that will drive up to 55 mph. This rate of speed is not possible from a human-pedaled mountain bike, even with a highly trained professional riding it. I, therefore, offer a suggestion that the definition of bicycle and e-bike be written as follows:

"Bicycle. A pedal-driven, nonmotorized, solely human-powered device, with two wheels attached to a frame, one behind the other."

"Electric Bicycle (E-bike). A type of motorized vehicle with two wheels attached to a frame, one behind the other, equipped with fully operable pedals and an electric motor of less than 750 watts that meets the requirements of one of the following two classes:

Class 1 E-bike. An e-bike equipped with an electric motor that provides assistance only when the rider is pedaling and that ceases to provide assistance when the e-bike reaches the speed of 20 or 28 miles per hour, based on specific model.

Class 2 E-Bike. An e-bike equipped with an electric motor that may be used exclusively to propel the e-bike and that ceases to provide assistance when the e-bike reaches the speed of 20 miles per hour.

Because of their speed and quiet nature, e-bikes could travel much farther into the backcountry, and disturb wildlife over far greater distances. E-bikes will conflict with other nonmotorized trail users like hikers, horseback riders, and bicyclists, especially if they are permitted on the same trails.

Currently, because there is almost no enforcement for trespass, illegal off-trail riding, and unauthorized trail development by some users, I fear that e-bikes will only increase the likelihood of such trespass into Wilderness and other protected areas. This illegal use will only degrade the wild character of these lands, and should not be encouraged, as this rule will most certainly do.

This proposed rule suggests likely environmental impacts (i.e., increased impacts on wildlife, conflicts with other trail users, unauthorized trail creation) that should be fully evaluated through an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA). I also ask that the Forest Service look into another potential problem with e-bikes related to the lithium-ion batteries that power them, i.e. batteries igniting spontaneously or even exploding while being ridden. With major fires occurring every year, the Forest Service

may want to reconsider how they designate classes of e-bikes. I have included references at the end of this comment.

Finally, I am concerned that the real reason for this rule now is to allow e-bikes on nonmotorized trails in the future, especially since the Forest Service is treating e-bikes differently than other motor vehicles. This seems to set up conflicts with the Forest Service's own Travel Management Rule (36 CFR 212 et seq) and has the potential to impact the environment, so it is important that the Forest Service analyze such a proposal under the National Environmental Policy Act.

I realize that the Forest Service mission includes increasing access to forest trails so that everyone, even those who may have physical limitations, might have an opportunity to experience nature, and I understand that e-bikes may provide this access. However, I am unwilling to allow such technologies to disturb the wildlife, interfere with other users, or to change the wild character of wilderness or other protected areas just so that one group of users can have unfettered access to the National Forests, National Parks, National Monuments, and other public lands. These lands belong to all of us, but they must be protected from overuse and abuse, and right now it just doesn't seem like they are getting the protection they deserve.

Based on what I have read about e-bikes, comments of others, news reports, the threats posed to wildlife, wilderness and other protected areas, the inevitable conflicts with users if they are permitted on nonmotorized trails, the creation of even more unauthorized trails, the potential fire danger of lithium-ion batteries, I believe that the Forest Service should withdraw this proposal. I don't believe that it is in the best interests of the public to allow electrically powered bikes, regardless of class designation, onto current mountain bike trails or any other trails that were created for nonmotorized use only. Thank you for this opportunity to express my views.

Sincerely,

Lee Ann Bennett

References

References

Hawkins, Nathan. Personal comments on ebike use. September 25, 2020. 11:54:38 AM. In Public Reading Room on USFS Website.

Reid, Carlton. 2019. Electric road bike explodes on Adelaide hill climb, causing bushfire. [www.Forbes.com](https://www.forbes.com/sites/carltonreid/2019/01/14/electric-road-bike-explodes-on-adelaide-hill-climb-causing-bushfire/#7f2c3c7fd91f). January 14, 2019. <https://www.forbes.com/sites/carltonreid/2019/01/14/electric-road-bike-explodes-on-adelaide-hill-climb-causing-bushfire/#7f2c3c7fd91f>