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Title:

Comments: Foreseeable/current problems with the use of ebikes on gated National Forest roads/trails.

Currently, the use of ebikes on trails, gated roads, etc. are prohibited on National Forests. There are many reasons to keep it that way.

*One of the reasons stated for revisiting the permitted use of ebikes is that it provides recreational opportunity. The experience on National Forests vary by the user. I would suggest that most visitors on the forest seek the outdoors for seclusion, exercise, and connection to nature. I can't see a good reason for allowing the use of a motorized vehicle (regardless of class) could enhance this experience. Currently, there are thousands of miles of roads that the ebike is legal to operate. A road that is currently open to motorized traffic is also legal for ebikes. Gated roads and trails are often the only access for those who seek conclusion within the forest. This will have a huge negative impact on other users and potentially create dangerous encounters and user conflicts.

*Another reason stated is that it will provide more recreational opportunity for the handicapped. I disagree with this as well. The districts I have worked on stopped the use of allowing motorized vehicles on certain roads due to the fact that there was no way to know who is handicapped or classifies as so and what is not.

oPoint being that we do not have the personnel to properly enforce the rules on current motorized vehicles on open roads, what makes us think that we can do this on gated roads/trails?

*Currently, in NC, the USFS is restricting and closing areas to camping due to the environmental impact and damage. Even though some of these areas are remote, they at least require physical exertion to get there. I can't see a single positive reason for allowing the use of ebikes will help with environmental impacts to such areas. Resource protection is one of the most important tasks that the USFS is responsible for.

*At what point does this stop? Ebikes are just getting started. If it is currently regulated by speed or watts, how will that be enforced? LEO's would have to have something to measure wattage making it almost impossible to regulate. Would there be regulation against possessing two or three different motors on one ebike if they all fall within the limit? This would be non-enforceable.

oWill we only allow bikes with two wheels? What do we do when someone that has a handicap wants to take their golf cart (within the watt or mph rule) on a gated road? Will they be exempt? Restricted? How are they going to get their "ecart" around our gate to give them access? Will we be required to give that access?

oWhere will we be in 2, 5, 15yrs? Battery powered devices (such as ebikes) are evolving fast. Currently, the bikes, with little or no pedaling, will do 20mph and some will do so while pulling a cart along with the rider. If we are going to allow a "bike" to pull a trailer and/or cart, then why wouldn't we allow a regular vehicle to do the same on a current closed/gated road?

*The Forest Service cannot maintain the current trails that only allow foot travel. How is it expected that more maintenance won't be needed? The recently signed Outdoors Act funds backlogs of maintenance issues (with 70% going to National Parks), how are we going to create more of a burden of maintenance and expect to accommodate it?

*The USFS differs from BLM and the USPS. BLM is western land which doesn't see the human impacts like the east. Permitting ebikes to travel everywhere a traditional mountain bike is permitted to travel is creating more of a problem. There is already problems with illegal trail construction within the mountain bike community. This would further the problem by the minimal effort it takes to reach these areas on an ebike and allow for further, illegal construction of use. Once established, the illegal trails become advertised and more frequently used with no way of enforcing the activity.

*Will the USFS develop trail specific to ebikes? Ebikes and traditional mountain bikes are not in the same category. If trails were developed or if ebikes are allowed to operate on current ATV trails, will those users be required to pay fees?

*The allowing of ebikes (a small percentage of forest users) will likely take away from the experience of other users, which makes up probably 90% of forest visitors.

The USFS and the DOI agencies differ greatly in their purpose. Some of this is due to location of the property, but not all.

-The National Park Service doesn't allow collection of resources, hunting, drones, etc. whereas the USFS does.

At what point or how will the USFS address the impact of the additional resources being taken from the land? I.e. wildlife, wood, galax. The BLM and other agencies with mostly western lands should not be compared the to the USFS lands as a whole. The arid climate of the west can support different impacts than the land in the deciduous east. Currently, the USFS lands in the western part of the US manages ATV use much differently that its eastern counterpart due to weather and remoteness.

-The wet, and sometimes steep areas of the east are far more vulnerable to environmental impacts that the west.