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Title:

Comments: Ebike regulations are very important to control this new technology which is blurring the lines between human powered bicycles and traditional gasoline powered motorcycles. While the ebike industry touts clear delineation between three categories of ebike, this line too can easily become blurred and needs to be anticipated in the regulatory scheme.

The Bonneville Shoreline Trail is partly on USFS land and has a non-motorized shared-use trail designation to minimize user-caused trail erosion and for user safety. Too much speed and torque will damage the natural trail surface and disparity of user speeds can be dangerous.

What concerns us is that there is no clear visual distinction between ebike types which makes enforcement difficult. We agree that the three class ebike system is a good attempt to segregate ebike types and that the class 1 ebikes with low power and user peddling required. I recently saw a very young rider on his ebike able to keep up with his parents on traditional mountain bikes going a very difficult hill, which is a good thing.

A concern is that there is a slippery slope in allowing bicycles with a motor to be designated as "non-motorized". However as technology proceeds, it may be increasingly difficult to visually tell which bikes have a motor or not. First, rules allowing ebikes on non-motorized trails must clearly specify trail signage requirements that will indicate peddle-assist low power ebikes only. The USFS needs to ensure that this rule will not someday allow 4000 watt e-motorcycles that can go 40 mph on our non-motorized trails.

Second, I would recommend that a clear visual distinction between ebike classes be required such as a color-coded drive train- green, yellow, or red.

Third, I recommend that there always be a locally decided Ranger District level policy allowed that will be able to prohibit ebikes on individual trails or on a District level based on local conditions. The conditions may include terrain, weather, and population.