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Comments: I believe there is place for e-bikes on public lands, but also that there are important differences between the use of e-bikes and traditional human powered bikes that warrant thought about how and where safe integration of e-bikes can be allowed. Given the higher speeds allowed while going uphill, e-bikes do have the potential to increase collisions and user conflicts while traveling uphill vs. traditional bikes. This is an important consideration on multi-directional trails, particularly for trails with limited width, and limited sight lines due to natural contours related to topography, visual obstructions due to foliage, etc. Simply put, traditional human powered bikes are limited in speed while climbing uphill to the users fitness level, and these limits provide a "built in" safety mechanism whenever a climbing bicyclist meets another trail user (whether downhill biker, hiker, or equestrian) by allowing a natural level of reaction time to avoid a collision. With e-bikes, uphill climbing speed is not limited by fitness. As a result, when an e-bike meets another trail user, the natural amount of reaction time is usually reduced because the e-bike is going at a higher rate of speed vs. a traditional bike. This inherently will lead to greater number of collisions in situations that would have only been "close calls" with a traditional bike.

With that said, several common sense policies could increase the safety of e-bike use. Letting local BLM/Forest Service staff who are familiar with the trails in their area choose which trails are appropriate/not-appropriate for e-bikes would be a good start. For example, e-bikes can much more safely be allowed use on less popular trails, wider (doubletrack) trails, dirt roads, and one-way single track trails - all of which reduce the likelihood of user conflicts. Additionally, where e-bikes are allowed, it would be wise to have a modified policy regarding "right of way" etiquette for e-bikes vs. traditional bikes on multi-directional trails. Whereas etiquette for traditional bikes calls for the bike traveling downhill to yield to the uphill bike, it would be worth considering changing the policy so that e-bikes yield in both directions (uphill and downhill) to traditional bikes. This would lead e-bike users to slow down anytime they encounter a user coming the other direction, giving more margin for error to avoid a collision. In cases where the e-bike is traveling uphill, requiring them to yield will give the downhill rider a longer distance to slow down themselves (and they would likely end up yielding to the uphill e-bike since it is difficult to visually distinguish an e-bike from a traditional bike these days). It's far better if both riders are preparing to stop than giving permission for the e-bike to continue at the same rate of uphill climbing speed because they believe they have the right away (given how much faster an e-bike can go uphill compared to a traditional bike).

Thank you for considering these ideas. I believe e-bikes are going to be around for a long time, so rather than fighting the idea completely, it is more important to consider how to safely integrate them to the existing trails. In many cases, this can be done very safely, but I also know that there are trails where their presence would increase the likelihood for collisions and user conflict.