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Organization:

Title:

Comments: Electric bikes are MOTORIZED VEHICLES and should NOT be allowed on non-motorized trails. As a member of multiple Back Country Horseman Chapters, trail volunteer groups and equestrian groups that build and maintain trails I do not want ANY motorized vehicles on current non-motorized trails. This is a safety issue for not only equestrians, hikers and mountain bikers but for the wildlife.

"non-motorized trails were created to ensure that the public could find recreational trail opportunities free from the ever-growing motorization and mechanization of our public lands. Millions of public land users including hikers, backpackers, hunters, horse packers, climbers and mountain bikers value non-motorized trails for recreation."

Once an area has been naturalized to motor vehicle use, it is automatically disqualified from consideration for future protection as a federally-designated wilderness.

If new e-bike trails can only come from trails that are currently non-motorized, the availability of trails promising a lack of interaction with vehicles is necessarily reduced.

Because e-bikes are surprisingly quiet, this combination of speed (Class III e-bikes can accelerate up to almost 30 mph unassisted) and silence endanger traditional non-motorized trail users, especially hikers, who typically average 2-3 mph, and equestrians, because horses tend to spook extremely easily. Many non-motorized trails are more remote and inaccessible than motorized trails and roads. If non-motorized trails are re-classified as e-bike trails, it is likely that Search & Rescue (SAR) calls will increase, and that more trail users will be injured more severely and more frequently.

COST

Re-classifying non-motorized trails to allow access for e-bikes will result in numerous costs that will ultimately be footed by Taxpayers, the vast majority of whom do not use e-bikes:

- Costs associated with re-signing existing trails and re-printing MVUMs;
- Costs associated with trail maintenance, and specifically accelerated trail erosion;
- Costs associated with enforcement and regulation of e-bike users on trails;
- Costs in staff hours associated with re-classifying non-motorized trails as appropriate for e-bike use;
- Costs associated with the inevitable lawsuits that will arise as a result of inappropriate designations, failures to properly adhere to legal and regulatory procedure in re-classifying trails, conflicts between user groups, and civil liability litigation that will arise as a result of collisions between e-bike users and traditional non-motorized trail users.