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Comments: As a nearly 40 year resident of SW CO I have witnessed first-hand the exponential growth of the mountain bike industry and the negative effects of seemingly endless development of legal and illegal bike trails in the San Juan National Forest. Wildlife biologists are sounding alarm bells as wildlife habitat on our public lands is increasingly being fragmented by both sanctioned and illegal user-created trails - in some cases leading to population level declines.

E-bikes are mountain bikes on potent steroids, allowing even novice bikers the ability to travel farther and faster into the backcountry. On a recent hike looking for bighorns near the top of Coal Bank Pass my wife and I encountered E-bikes illegally using Coal Creek Trail and regular mountain bikers using an illegally built loop off the trail. Riders were loudly whooping, grunting and using profanity as they approached us and flew by. The days of quiet wildlife watching and trail use are largely over in many areas of the forest that allow mountain biking. E-bikes are a new huge environmental threat to the integrity of our national forests and the FS should consider all of the following:

E-bikes must continue to be treated as motor vehicles, not bicycles. E-bikes must travel only where motor vehicles are allowed.

This proposed rule suggests likely environmental impacts that should be fully evaluated through an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA).

The proposed rule appears to set up conflicts with the Forest Service's Travel Management Rule (36 CFR 212 et seq).

Because of their speed and quiet nature, e-bikes can travel much farther into the backcountry, and startle and disturb wildlife over far greater distances. E-bikes also conflict with other nonmotorized trail users like hikers, horseback riders, and bicyclists.

Because there is almost no enforcement now for trespass, illegal off-trail riding, and illegal trail development by some bikers, e-bikes will increasingly trespass into Wilderness and other protected areas with no consequences. This illegal use will degrade the wild character of these lands and should not be encouraged as this rule will do.

The Forest Service should withdraw this proposal.