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Comments: I've read your recently released Draft EA addressing proposed changes to rules pertaining to e-bike use in the Bridger-Teton National Forest and commend your well-researched and documented analysis. I'm strongly in favor of expanding e-bike use and believe that Alternative 1 is the most fair and reasonable option. My reasoning:

My experience over 60 years of road and mountain bike riding and recent e-bike use around the western US has convinced me that most of the safety concerns are red herrings; arguments that make sense hypothetically but have no basis in actual experience and serve as proxies for the real issue: increasing trail use.

The documentation that you provide in the Alternative 1 description in the Environmental Impacts of the Proposed Action and Alternatives section of the EA documents and articulates quantitatively what I have observed - E-bikes on trails have not shown to be more dangerous. The speed differential between different classes of bike does not lead to higher speeds on trails - Class 1 and class 3 bikes don't have different climbing speeds. Realistically, they never climb significant grades at speeds approaching 20 mph. The bike class isn't determined by power and resultant climbing speed, it's determined by the speed at which the electric motor ceases to provide assist. The only significant difference between class 1 and class 3 speeds comes into play on flat paved routes open to motor vehicles. In my experience, downhill speed is determined by the nature of trails and level of rider ability and confidence, not bike power.

The real issue is increasing trail use by introducing new users. But that is going to happen anyway with the growing popularity of hiking, high school mountain bike racing, and growing population. Banning a new group of users doesn't resolve the issue of increasing trail use, it only postpones it. It would make just as much sense to ban new mountain bikers, new hikers, or certain user demographic groups.

My only concern about both of the alternatives provided is including class 2 e-bikes. Class 1 and 3 e-bikes require user effort - riders need to pedal to move and the motor only provides an assist. Class 2 e-bikes with a "throttle" seem to me to be dangerously close to motorized vehicles. I have seen electric dirt bikes with performance equivalent to off-road motorcycles and would not want that technology unleashed on non-motorized trails. If class 2 e-bikes are allowed, maintaining a strict limit on the power output would be important. And I'd worry that acceptance of class 2 e-bikes might lead to low-speed ATVs and other unanticipated vehicles. It feels to me that any vehicle that does not require some human-powered assist falls in the definition of motor vehicle, just like my electric car.

Thanks for your effort.