

Data Submitted (UTC 11): 7/15/2025 12:23:47 PM

First name: Grace

Last name: Ogawa

Organization:

Title:

Comments: Objection to Draft Decision for Class 1, Pedal-assist E-bikes on Select Trails in Deschutes National Forest, #66475

To Alicia Bergschneider and/or whom it may concern,

I am disappointed in the draft decision to adopt Option 2, altering the rules to allow Class 1 e-bikes on specific trails in Deschutes National Forest. To me this represents a failure to prioritize the integrity of our natural resources and vanishing wilderness habitat and supplication to that side of the recreation industry more concerned with enriching themselves than in stewarding our vulnerable environment. Please find my detailed objection below.

Abstract

The use of e-bikes on singletrack beyond that of mobility assists for those with disabilities increases the hazard of collision, injury, and conflict between trail users. It negatively impacts the emotional wellbeing of non-motorized trail users and wildlife. The restriction of e-bikes to certain classes, trails, and times does not represent meaningful mitigation of impact due to the ease of violation of restrictions. I object to the draft decision and respectfully recommend a withdrawal of the proposed rule change.

Negative impacts of motorized recreation

Because e-bikers generally go faster and have a higher likelihood of being novice riders, they represent a physical hazard to both themselves and others. Due to the common speed differential between e-bikers and non-motorized (muscle) bikers, instances of passing are increased, which in turn increases opportunities for conflict and collision.

A human riding a muscle bike, working as hard as they want, who is not a world-class athlete, will likely be overtaken by any e-biker who doesn't have a limiting factor such as a disability. This e-biker will not be working as hard as them, yet will be going so much faster that the difference is substantial. From my lived experience, interaction doesn't feel like one with a fellow trail-user; it feels like getting passed by a motor vehicle. Which is what I go to the trails to get away from!

E-bikes, even Class-1 e-bikes, are motor-bicycles. Their presence fundamentally and negatively alters the recreational experience on trails, and they should not be allowed on non-motorized trails in Deschutes National Forest.

Environmental considerations

In our modern world it is easy to forget that human beings are the ultimate invasive species. Our mere presence in natural areas is a disturbance. For those like myself who indulge in recreational activities in natural, undeveloped or minimally developed areas, preservation must be a critical concern. E-bikes represent a challenge in that they increase the weight, speed and range of any given biker, thus enabling them to disturb more wildlife and degrade more habitat. Increases are both in range of the ride (distance covered) and in frequency (riders doing "laps" around popular loops).

Use of e-bikes will significantly impact the already fragile natural integrity of our forest. It is our duty to enjoy recreation responsibly with an emphasis on conservation, to which the general use of e-bikes would be a detriment.

Adherence concerns

A key consideration of the proposed rule change is that the only type of e-bike allowed would be Class 1 pedal-assist e-bikes. However, it is difficult to tell by looking which class of e-bike one is, especially since manufacturers have endeavored to conceal the motor to give the machine the appearance of a muscle bike. There are also numerous avenues for e-bike users to "jailbreak" their Class 1 bikes so they are no longer compliant with regulations in speed and assist.

In reality, it must be presumed that allowing even one type of e-bike would encourage all types of e-bikes, and this part of the rule will have poor adherence.

Similarly, people are already riding e-bikes on singletrack where e-bikes are prohibited. Even allowing for use by people with disabilities, I regularly see young, healthy-looking people riding e-bikes seemingly just for the pleasure of going fast without working hard. I have observed them on all the trails affected by the proposed rule change and several trails (such as Met-Win and Tumalo Ridge) that would remain closed to e-bikes.

This lack of adherence to existing rules strongly indicates people wouldn't adhere to the new ones, and muscle bikers and hikers-and even equestrians-would be thrown into conflict with e-bikers where they are not expected.

Alternative options

I believe that our natural resources are our most precious and vital commodities, and that the more people enjoy them, the more people will value and protect them. Motorized assist to persons with disabilities appropriate to the individual's needs and abilities are a valuable asset in spreading awareness and wellness to humans and nature alike. However, given that a person without a disability already may enjoy these trails through non-motorized means, they should be expected to do so.

The strongest argument I've heard for allowing e-bikes on these trails is to allow people with heart conditions, asthma, or ongoing cancer treatments, to enjoy the outdoors. But these disabilities should already qualify them for exemption under the ADA. This should be made abundantly clear so that these individuals have a path forward to outdoor recreation.

Give people with disabilities clear indication that they are exempt from the e-bike restriction. People without disabilities can thoroughly enjoy the trails without the use of a motor. Sometimes slowing down is the point.

Summary

E-bikes, even Class 1 e-bikes, are motor-bicycles. Because distinguishing different classes of e-bikes from one another is difficult, and because people can modify their class 1 e-bikes, the distinction of allowing only Class 1 e-bikes carries little weight. Further, the lack of adherence to existing rules suggests people wouldn't follow the new ones. The increased traffic from e-bikes would negatively impact our vulnerable natural habitats. People with disabilities should be given clear indication that they are exempt from the e-bike restriction under the ADA.

My lived experience is that the presence of e-bikes negatively alters the recreational experience on trails.

Please withdraw the proposed rule change.

Thank you for taking the time to read and consider my objection.