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Comments: Thank you for this opportunity to comment on the Draft EA and FONSI on managing ebikes and possible inclusion on some of the trail managed within Deschutes National Forest. E-mountain bikes on single track trails are controversial with strong arguments and emotions on both sides of the allow/don't allow equation.

Justin and the Recreation Planning team put a lot of research and thought into the inventory of trails to be open to Ebikes in this proposal. Key factors in the selection process were trails managed as mountain bike trails (no trails managed as hiking or pack and saddle) and connectivity to other open to Ebikes trails with no open trails leading to trails to not be open in the proposed action. One of the main goals with that is reducing user conflicts with other user groups such as hikers and equestrians. Given that as a goal, the FS is in fact admitting that increased user conflicts are possible/probable. While the decision-making process for which trails makes logical sense, the proposal will fail unless 3 key areas are addressed and there is a firm plan for addressing:

1. Implementation- There is very little if any info in the EA and NEPA documents on how the plan will be implemented on the ground. Without such detail it is hard to fully support this proposal, or at minimum inspire a desire to request additional information. What does the signage program look like? Who/how will this signage program be afforded and installed? What does the trail signage program for trails not open to Ebikes look like? Will there be a reference to a specific CFR and penalties for noncompliance on these signs? I see that as common on this and other forest as it pertains to things like Wilderness Permits and motorized recreation.

2. Enforcement- There is no information in the NEPA documentation on how this decision will be enforced. FS officials will readily admit there has been no enforcement of the current no ebikes on trails managed as non-motorized rule in place, and the EA document itself refers to ebike riders currently using the trail network illegally (with no enforcement as one of the main causes of a comfort level of ebikers doing so). If the past rule of no ebikes on any trail was not enforced due to whatever reasons, how will this new some trails open to ebikes (some of the time, others have winter closures) be enforced, especially given the light of significant budget cuts and staffing cuts recent with the new administration?

3. Prevention of encroachment and expansion - How will the FS assure this decision does not lead to greater encroachment of many things: Ebikes on trails not open to ebikes, Class 2 and 3 ebikes on these trails proposed to be open to Class 1, Onewheels and E unicycles and other similar devices on these trails. How will the USFS monitor and enforce the Winter Wildlife closure area to remain free of ebikes in the winter months honoring the LRMP and this EA and DM?

Obviously, there is a strong relationship between these 3. With no enforcement there will be encroachment and expansion of use. Without a good implementation and enforcement plan, we will see ebikes on trails not intended to be open and that will lead to a significant increase in user conflict. Examples include: Deschutes River Trail (I live at 7th Mtn Resort and watch ebikes ride down an access trail to DRT on an almost daily basis), Flagline- this trail has much more climbing than most trails in Bend and as such the temptation to ride an ebike on this trail will be great, Met Win Trail- managed as an important Equestrian trail and again this is a longer high country trail with more climbing than the Phils network and the temptation to use an ebike on this trail will be high, Wilderness trails- The motor of the ebike gives much more ability to ride further and steeper trails, I have already encountered an ebiker on Wilderness trails while out backpacking. These are a few examples, but not limited to these.

I would also like to address the FONSI- Finding of No Significant Impact. USFS is required to provide best available science in these EAs, unfortunately there is very little research and science regarding impacts of ebikes

as compared with traditional mountain bikes on trail tread surfaces. Without such, FS is providing little if any real science on the topic. The field of research that would be appropriate is known as recreation ecology. None of the leading recreation ecologists have studied ebike impacts mostly due to lack of research funding (not because of lack of interest, they follow the money). I have worked with 2 of the leading recreation ecologists in the US in the field and have done conference presentations with Dr. Jeff Marion (retired USGS researcher) and Dr. Jermy Wimpey (Applied Trails Research PTBA member). I have had conversations with both on occasions including 3 days on PCT with Jeff last summer and we spoke at length about ebikes and our gut feelings on impacts. Both Jeff and Jeremy feel there will be greater impacts but have not studied. The main areas we all feel will result in greater impacts are greater torque and acceleration/deceleration forces.

I am a retired trails professional planner, designer, and contractor with over 25 years experience. I recently was awarded both the Legacy Member award but also the Lifetime Achievement Award from the Professional TrailBuilders Association. My work has included contributions to a number of trail related books including the USFS Trails Pocket Manual and I have provided trail consulting and education services to all the major federal land managing agencies including: US Fish and Wildlife, National Park Service, BLM and many units of the USFS. In my professional and personal opinion I feel there will be increased impacts in 2 main areas: Physical impacts to trail tread surfaces and social impacts. Are these predicted impacts significant? Which is the question the FONSI speaks to. In my opinion the answer is yes. Will the impacts be acceptable, that is a different question.

We will see increased physical impacts in a number of ways. As noted before, greater torque per rider and increase acceleration and deceleration forces. With the largest trail system on USFS lands in the US open to ebikes we will see an increase in ebike tourist and that will have a greater impact on trails. The decision to open so many miles of trails to ebikes likely will increase overall ridership of trails, and that will have an increase to trail tread impacts effect. And lastly, with increased mileages possible for each ebike rider (as compared with human powered mountain bike) on each and every ride there will be increased impacts.

There will also likely be significant impacts to the social environment, especially in the first 6-12 months (and especially if my big 3 questions are not addressed). There was an encounter within the last month of 1 mountain biker and 4-5 ebikers that was filmed and posted on a number of social media sites. Though the mountain biker may have overreacted some, the reality is that the ebikers were in fact poaching a local trail not currently open to ebikes so there were really in the wrong. This user conflict will increase on all trails open to ebikes, but additionally on trails that ebikers continue to poach. This needs to be addressed (see enforcement) before this proposal moves forward.

Thank you again for the opportunity to comment on this proposed action relating to the management of ebikes on Deschutes NF lands.

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