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October 21, 2020

Tracy Tophooven
Director Recreation Heritage & Volunteer Resources
1400 Independence Ave. SW
Washington, DC 20250

Dear Ms. Tophooven and Recreation Staff,

Mountain Bike the Tetons (MBT) is a regional chapter of the International Mountain Bicycling Association (IMBA). Our mission is to build a vibrant, healthy community by enhancing recreational and economic opportunities in the Teton Region through the development of our outstanding mountain biking resources. We represent both the Jackson Hole, WY and Teton Valley, ID mountain biking communities and submit our comments on behalf of our organization, our staff and board. We are grateful for the opportunity to submit public comment regarding these proposed Forest Service Directives.

We applaud the USFS in their efforts to manage innovation and recreation use comprehensively in this case. We strongly believe that the USFS is correct in recognizing three classes of e-bikes based on their drive systems and top speeds. This will ultimately allow for more nuanced management moving forward, aligning with numerous states and municipalities nation-wide.

We support an update to the 2005 USFS Travel Management Rule (36 CFR Part 212) adding a category of motor vehicle use that is specific to e-bikes as outlined in proposed the FSM Proposed Directive Chapter 7711.3.

Ultimately, MBT believes that access to natural surface trails for traditional non-motorized mountain bikes is critical to the future of mountain biking. As technologies evolve for riders, including those of the adaptive mountain biking community, we understand the need to examine access for Class 1 eMTBs for non-adaptive athletes and the unique characteristics they possess compared to traditional mountain bikes. We support trail access for Class 1 eMTBs for non-adaptive athletes and Class 2 eMTBs for adaptive athletes if and when current designated non-motorized trails are examined Forest-wide but ideally specific to each Ranger District through criterion outlined in the FSM Proposed Directive Chapter 7751.5, particularly Section 4, c. (...consideration of whether a programmatic environmental analysis may be feasible and more efficient due to similarities in effects of bicycle use and e-bike use). Engaging

a full NEPA analysis for current and future non-motorized trail systems when considering e-bike access is imperative.

MBT recommends that Class 1 eMTBs for non-adaptive athletes and Class 2 eMTBs for adaptive athletes be managed independently from traditional mountain bikes and we encourage agency managers to develop separate regulations for all cases.

Again, thank you for the opportunity to comment publicly on these proposed directives. We look forward to continued engagement in this process.

Regards,

A handwritten signature in black ink, appearing to read 'TF' or similar initials, written in a cursive style.

Tony Ferlisi, Executive Director - MBT