

Exemption Request for Class 1 Mid-drive Pedal Assist Mountain Bikes on Forest Service Mountain Bike Trails

I ride traditional and Class 1 Mid-drive Pedal Assist mountain bikes (Class 1 EMTBs). I support allowing Class 1 EMTBs on all Forest Service trails where mountain bikes are currently allowed. I believe Class 1 EMTBs should be granted an exception and be classified as mountain bikes. My experiences, those of (many) others, the design and operation of the bikes, and published comparisons between regular mountain bikes and Class 1 EMTBs impact on trails and users, supports this exemption. Additionally, exemption support comes from other similar allowances previously granted by state and federal land management agencies, such as the BLM. Unfortunately the way the current Forest Services proposed directive on E-bikes is written is problematic.

I do not encourage that the public spend tax dollars doing environmental analyses, trail studies, etc in order to grant Class 1 EMTBs this exemption as the default condition on all current mountain bike trails (this is not my typical mindset; usually I think all that is warranted). Requiring local approval for the exemption would drag out the process, waste time, and force every local agency/community to repeat a process that will have similar discussions, input, and outcomes. The discussions regarding Class 1 EMTBs the Forest Service is having right here is basically a repeat of what other state and federal agencies have done.

For those who have ridden Class 1 EMTBs or who have hiked or ridden traditional bikes on trails with Class 1 EMTBs, the difference between the trail impact, speeds, user conflict, etc really is difficult to discern - if all parties are being objective. I understand that there are rouge e-bikers, mountain bikers, hikers, and horse riders that can be bad examples of their various groups. I respect that certain individuals may have had one or several negative experiences with EMTBs, and appreciate their input on this. I do think most of it is overblown with respect to Class 1 EMTBs trail impact and user conflict (and is mostly equivalent to traditional mountain bikes).

While I do support a Class 1 EMTB exemption, I agree with many of the individuals who are raising concerns about Class 2 throttle bikes. Many of the general naysayers in the comments seem to be describing attributes of Class 2 bikes, which are basically mopeds, motorcycles, and scooters - not mountain bikes. I do not believe Class 2 bikes should be

used on Forest Service mountain biking trails. I believe they should continue be considered motor bikes, if they use a throttle, and limited to motorized trails only. Any changes in this should require studies and area specific land management approval. I urge caution so the Forest Service does not create a Class 2 based loophole for opening up all trails to throttle bikes.

It is possible that trails will become more crowded with EMTB use due to an influx of new EMTB-only riders, but I think some of those predictions may be overblown. Even if they do I say, good. Public lands are for the public. Does part of me NOT want any more people on “my trails”? Of course, but the truth is they don’t belong to me. Just because I am more physically fit than most doesn’t mean I somehow earn more access to the trails than somebody who is older, disabled, higher-weight, injured, less motivated, or who simply wants to use a pedal assist mountain bike (at times when I would chose a traditional bike). For a variety of reasons, I choose which type of bike I’m going to ride depending on my goals for my ride that day.

It would not be fair for me to submit my comments without discussing enforcement and regulation of all classes of E-bikes. It seems that many who comment in support seem to skip this. I agree that compliance (typically voluntary and education driven) and enforcement (often penal) issues will need to be addressed. Cynics often say that Forest Service personnel won’t be able to tell the difference between the types of mountain bike classes. I disagree. I think most rangers and enforcement people are smart enough to discern this. I can do it, so I’m sure they can. We will need education about what types of bikes are allowed and where. And yes, we will need money to make and enforce this change. How much is a matter for the Forest Services to study and request from the government (or budget within). If most people are compliant then this may be a (relatively) minor amount of money.

EMTB’s are coming in the same way that snowboards were coming decades ago. I am not analogizing snowboards being equal to pedal assist bikes, but they are an example of an attractive new technology arriving onto an existent human system. Many of us skiers felt the sky was falling when we saw the first snowboard. It didn’t and the “experience” to skiers (and snowboards) didn’t materially change. In 10 years, Class 1 Mid-drive Pedal Assist bikes will be fixtures on our trails in the same way that snowboard are here now. I don’t want the wilderness opened up to throttle bikes, mopeds, scooters, and motorcycles, however. In that

case, for me the proverbial sky is actually falling and that would materially change the current wilderness experience.

Please allow Class 1 Mid-drive Pedal Assist bikes to be afforded an exemption and classified as mountain bikes for the purpose of riding on Forest Service mountain bike trails. The way the current proposed directive is written is problematic and I urge that the final rule be adjusted.

Sincerely,

Jon Fritsch

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