

October 26, 2020

U.S. Forest Service  
Director, Recreation Staff  
1400 Independence Ave SW  
Washington, DC 20250-1124



Thank you for the opportunity to provide comments on FSM 7700 and FSM 7710, proposals to update & clarify guidance on management of e-bike use on National Forest System lands.

The Central Ohio Mountain Biking Organization (COMBO) is one of the leading groups advocating for natural surface trail access for mountain bikes in Ohio. In partnership with various city, county and state agencies, COMBO builds & maintains trails for users of diverse abilities. To this end, we also offer novice, intermediate, and advanced rider education workshops. In the course of delivering our mission to Create, Advocate & Preserve Quality Mountain Biking in Central Ohio, we have been in position to learn about and wrestle with the issues related to the management of access for electric bicycles (e-bikes), specifically electric mountain bikes (eMTBs).

Although none of our managed trails are Forestry Service trails, the land managers we partner with regularly look to the National Forestry Service, Bureau of Land Management, Dept. of Interior and other national agencies for guidance and direction in development of their own State, County & City managed lands. To this extent, proposed changes to NFS directives have a direct trickle-down impact on local regulations.

We welcome the willingness of the National Forest Service to revisit directives that currently impact shared use of diverse user groups. Generally, we support increased access for users of all abilities and the adaptive technologies that make this possible. Furthermore, we support the proposed intent (increased access) of the changes to directives & designation with concerns. Specifically, we fully support a directive that considers how to allow Class I eMTBs on non-motorized trails while retaining a trails non-motorized status.

Our first concern is that land managers often manage trails based on a “motorized” or “non-motorized” designation. Placing e-bikes into the motorized category jeopardizes the non-motorized trail designations as land managers could be put in a situation to change the trail designation in order to accommodate e-bikes. This potential change in trail designation as a result of the e-bike classification jeopardizes potential trail funding sources specifically to non-motorized trails and runs the very real risk of complicating land managers ability to manage which types of motorized vehicles would be allowed on a newly designated motorized trail. To the extent that accommodating e-MTBs would require a traditionally non-motorized trail to be recategorized as a motorized trail, we would oppose that change unless further restrictions were placed on which types of motorized vehicles would be permitted.

Our second concern regards acknowledging the classification of e-bikes into Class I, Class II and Class III vehicles without offering guidance for managing classes separately. We share concerns of others in the industry, most notably the International Mountain Bicycling Association (IMBA), that classifying e-bikes as motorized vehicles without further clarification for management implications of each class independently runs the risk of all classes being managed as one. We believe that Class I e-MTBs are much more closely aligned with the characteristics and performance of a traditional human powered bicycle whereas Class III and most notably Class II are more closely aligned with purely motorized two wheel vehicles, aka "dirt bikes". Class II and Class III e-MTBs are defined as those with motorized assists beyond 20 MPH, pushing them beyond the design intent of most natural surface trails that never considered anything going close to 30 MPH!

Thank you for your interest and willingness to address the quickly evolving technology of e-bikes. We are excited to see these technologies increase access and enjoyment of natural public spaces and welcome thoughtful regulations that better manage those spaces for all.

Sincerely,

The Central Ohio Mountain Biking Organization, Board of Directors

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