



SIERRA BUTTES TRAIL STEWARDSHIP

550 Crescent Street
Quincy, CA 95971
www.SierraTrails.org

10/23/2020

To whomever it may concern:

Thank you for the opportunity to comment on FSM 7700 and 7710 to clarify guidance on management of e-bike use on National Forest System lands.

As a volunteer driven 501c3 non-profit organization dedicated to the maintenance and enhancement of trail systems, Sierra Buttes Trail Stewardship (SBTS) works closely with both private and public land managers, including the Tahoe, Plumas and Lassen National Forest, to understand responsible trail use and accommodate different recreational modes of use for all trail users. Since our founding in 2003, SBTS has built more than 100 miles of new trail, maintained more than 1,200 miles of existing trail and provided more than 100,000 volunteer hours.

Over the past five years, SBTS has witnessed a noticeable increase in Class 1 pedal-assist bike use. Not to be confused with Class 2 or Class 3 electronic assist bicycles, Class 1 pedal-assist bikes do not have a throttle, do not provide any motorized power assist unless the rider is pedaling and have a top assist speed of 20 miles-an-hour. Pedal-assist bikes are a new form of recreational use largely misunderstood by the general public, which is why SBTS has partnered with the Tahoe National Forest in conducting hundreds of hours and thousands of miles of “saddle time” riding Class 1 pedal-assist bikes on trails to understand their impacts.

Here are our findings:

- Class 1 pedal-assist bikes have no more environmental impact on trail tread than a traditional mountain bike. In fact, due to the added weight and lower center of gravity, pedal-assist bikes have greater stability and traction under braking, resulting in less skidding and creation of braking bumps on the trail tread than a mountain bike.
- Unlike a motorcycle, Class 1 pedal assist bikes do not produce nearly enough power to create ruts in the trail when accelerating. Pedal-assist bikes accelerate with the same tread impact as a mountain bike.
- The pedal assist of a Class 1 bike allows more of the public to safely and responsibly enjoy more of our public lands, riding trails and seeing areas they otherwise would not physically be able to access. This expanded access distributes use over more miles of trail, reducing impacts on more heavily trafficked trails closer to trailheads. Further, the expanding battery range of pedal-assist bikes reduces the practice of vehicle-based shuttling, serving as an environmentally friendly “self-shuttle” that results in less vehicles on the road.

There have been concerns of trail user conflict with this new form of recreation. In our experience, operating Yuba Expeditions bike shops in Downieville and Quincy, California, renting Class 1 pedal assist bikes, we have not received a single report of trail user conflict involving a Class 1 pedal assist bike. Irresponsible trail use – whether on foot, horseback, motorcycle or bicycle – are the root of potential impact or conflict, not the vehicle itself. This impact or conflict is best mitigated by educating

trail users, not restricting them from their preferred mode of travel, especially when it has no negative environmental or social impacts.

SBTS believes in shared multi-use experiences, where trail users can co-exist and responsibly experience the outdoors in their own way. We support our National Forests in their efforts to be a pioneer in the expansion of responsible Class 1 pedal-assist bike access, as well as building a model for other land managers to follow.

Respectfully,

A handwritten signature in blue ink, appearing to read "Greg Williams". The signature is stylized and written in a cursive-like font.

Greg Williams
Executive Director