

October 26, 2020
501 Meador Ave. Suite 106
Bellingham, WA 98225



US Forest Service
Director, Recreation Staff
1400 Independence Ave. SW
Washington, DC 20250-1124
Portland, Oregon 97204

By electronic submission to: <https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2619>

RE: FSM 7700 and 7710 E-bike Proposed Revisions

Dear Ms. Wu,

I am writing today on behalf of the Whatcom Mountain Bike Coalition (WMBC) and our 988 members regarding the Forest Service's proposed revisions to e-mtb designations in FSM 7700 and 7710.

We are located in Bellingham, WA and have 3 bike manufacturers (Kona Bikes, Evil Bikes, and Transition Bikes) and 13 retail bike stores in our small, but vibrant community.

After reading through the proposed policy revisions surrounding e-bikes, below are areas where we believe the USFS should adjust the proposals.

Non-Motorized vs. Motorized Designation:

We believe that that putting e-mtb's into a motorized designation is the wrong approach and is inconsistent with how other land managers are designating e-mtb's. Currently, there are 27 states that have classified e-bikes as non-motorized including Washington State. Last week, the Department of Interior released Order 3376 that designates all three classes of e-bikes as non-motorized and class 1 e-bikes will be managed on trails at the local level.

We would recommend that the USFS designate all three classes of e-bikes as non-motorized. At a minimum, we would suggest that any policy revisions should align with USFS 36 CFR 212.1 and designate class 1 and class 3 (pedal assist) e-bikes as non-motorized and class 2 (self-propelled) as motorized.

By distinguishing between the 3 classes of e-bikes, the USFS can manage them differently. Class 1 e-MTBs could be allowed on non-motorized trails upon completion of an environmental review and public comment process, driven by the local forests or

districts and their stakeholders. Similarly, the USFS could prohibit Class 2 and 3 e-bikes on non-motorized trails.

Non-Motorized Funding:

If the USFS classifies all e-mtb's with a motorized designation, it would likely affect future non-motorized funding sources like RTP and NOVA grant funding in Washington State and similar non-motorized funding in other areas of the country. It also has an unintended consequence where any trail that allows a class 1 e-mtb would receive a motorized designation.

NEPA:

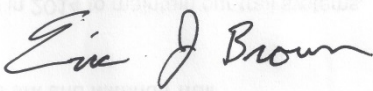
While we believe an environmental review and public process is reasonable across a forest or even USFS region, requiring NEPA to consider e-bike use on EVERY trail is cost prohibitive, impractical and will result in no action. Instead, we would advise a more programmatic approach done at the local level with the local stakeholders to identify where e-mtb use makes the most sense.

National Scenic Trails:

We believe that banning all e-bikes from ALL National scenic trails is the wrong approach and that a programmatic approach of where and how they can be considered at the local level by the local stakeholders. An example is the Pacific Northwest Trail which is near our organization and has many sections where an e-mtb would be very reasonable to allow.

All bike brands either have a class 1 e-mtb in production or are working on releasing them and the e-mtb market will continue to have strong growth into the future. Our suggestions above would help the USFS be in front of the technology as adoption of e-bikes continues to grow for both transportation and recreation purposes.

Best regards,



Eric Brown
Executive Director, WMBC
Phone: (206) 399-8347
Email: eric@wmbcmtb.org
Web: www.wmbcmtb.org