

Data Submitted (UTC 11): 10/24/2020 2:28:05 AM

First name: LAURIE

Last name: MAGGARD

Organization:

Title:

Comments: The U.S. Forest Service released proposed revised directives on eMTB management on September 24th.

- Requires a local public process before allowing any eMTB access, through NEPA and Travel Management planning.

- Distinguishes between class 1, class 2 and class 3 eMTBs.

- Manages eMTBs as a new category, separate from traditional mountain bikes. Challenges with the proposed directives:

- Continues to categorize all classes of eMTBs as motorized.

- If the Forest Service continues to classify e-bikes as motorized, these directives have the potential to reclassify non-motorized trails as motorized trails to allow eMTB access. This could jeopardize trail funding and lead to increased user conflicts.

Instead, the final directive must reconsider how to allow class 1 eMTBs on selection-motorized trails while retaining a trail's non-motorized status, similar to the recent Bureau of Land Management final rule that mountain bikers liked you helped shape. /as a person with major injuries, surgery now disability in both feet an E-BIKE is the ONLY way I can get on public trails ADA laws allow me accommodation of a class-1 ebike due to my disabilities

For more information on the potential consequences of the Forest Service proposed directives, read the IMBA blog. For more details on the directives, take a look at IMBA's summary guidance. For more information on eMTBs, visit IMBA's eMTB education page and IMBA's eMTB FAQs. Ready to submit a comment?

This comment period is being conducted through a U.S. Forest Service portal. The sample comment below is in line with IMBA's eMTB position, which supports class 1 eMTB access on non-motorized trails, as long as access for traditional mountain bikes is not lost or impeded. We always advocate for these decisions to be made via public process alongside local mountain bikers and all stakeholders.

Thank you for the opportunity for the public to engage on FSM 7700 and 7710, which would revise Forest Service directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System lands.

The mountain bike community is responsible for a large part of the natural surface trail infrastructure that exists today on our federal, state and local public lands. Hundreds of organized mountain bike clubs around the country manage thousands of volunteers who work closely with land managers on trail development, trail maintenance, and trail education for all users. Much of this work relies on funding sources specific to non-motorized trail projects.

The proposed directives could jeopardize this funding and increase user conflict if non-motorized trails were to become reclassified as motorized to allow for eMTBs. Instead, the final directive must reconsider how to allow class 1 eMTBs on select non-motorized trails while retaining a trail's non-motorized status, similar to the recent Department of Interior final rule. The final directive can be further improved by following the International Mountain Bicycling Association's management recommendations: managing the three classes of e-bikes separately from one another, and prohibiting class 2 and class 3 eMTBs on a natural surface, non-motorized trails.

Mountain bikers appreciate the leap in technology presented by eMTBs is a unique management challenge. These proposed directives rightfully plan separate management for bicycles and electric bicycles. It is critical that

land managers and local mountain bikers work together to determine where eMTBs are and are not appropriate on current and future mountain bike trails.

Thank you for your willingness to engage with the mountain bike community.

Sincerely,  
Laurie Krug