

Data Submitted (UTC 11): 10/25/2020 6:44:55 PM

First name: LeRoy

Last name: C

Organization:

Title:

Comments: Although overall I do not support the conversion of any non-motorized trails to allow ebike use, in terms of the new proposed language, as stated in the directive summary for the updates to FSM 7700-Travel Management Ch. 7700 and Ch.7710, it should give forests the ability to analyze e-bike use appropriately.

This language will cause/ allow forests at a local level to properly analyze what trails to authorize E-Bike use on. The proposed added language to FSM Ch. 7710 would allow for the specific designation of e-bikes to certain existing trails open to bikes (including the current motorized trails) Although the USFS is keeping the designation of all three classes of e-bikes as motorized, this language allows specific non-motorized trails to be analyzed to permit specific classes of e-bikes. This will allow for the flexibility of a non-motorized trail to include some level of e-bike (e.g., class 1) while restricting the use of other motorized uses (i.e., would not have to be converted to all motorized use) after a proper analysis.

The effect of the proposed language would make for an efficient programmatic transition to allow ebikes on specific trails on USFS lands. For example, if the trail management objective (TMO) is currently managed as up to motorcycle use, the process to allow for e-bike use on them would permit the forest to allow for ebikes relatively easily within the current TMO framework. Deviation from the proposed language (such as defining class 1 ebikes as non-motorized) would cause a great hardship on redesigning the TMO framework system. Basically, you are talking about a complete overhaul on the USFS trail database system if you were to go with any other language outside of what is being proposed.

From a management standpoint, one concern I have is that there is a discrepancy between the proposed language and the Travel Management Rule (TMR). The TMR defines a Motorized Vehicle as any vehicle that is self-propelled. Class 1 and 3 ebikes are not self-propelled but require pedaling to obtain the assistance/propulsion. However, the FS, W.O needs to understand the point of an E bike is to use the motor. One does not use/buy a e-bike to not use the motor. The definition in the TMR needs to be updated to account for ebikes (which were not topic at the time the TMR was finalized). A suggested definition for Motorized Vehicles could be: A vehicle that can be propelled and/or has a motor to draw power from.

With shrinking Forest Service staff and funding, undertaking resigning numerous trails will have a reasonably foreseeable effect on local FS resources. Therefore, there should be national funding allocated to forests who undertake this analysis once a decision is made. A trail sign is the first and sometimes only means of educating a user to the managed use of a trail. In addition, with new managed uses on trails, forests will need an action plan to enforce and engage the public on new rules. At a minimum for two years to engrain good public stewardship. Often the Engineering, Education and Enforcement framework is forgotten by FS leadership, and this will be important to get the public to buy into trails that are potentially going to allow ebike use.

Please feel free to contact me directly if you need any mountain bike counsel. I live in Colorado which has some of the most bicycle trails in the nation. Happy to offer my point of view and expertise to anyone who needs it. Several areas in the forests have reached their capacity and this is just another use that threatens the conservation effort of the FS mission. You simply can't manage every use for every track of land and if you change the current proposed language to anything outside of what it is, I foresee numerous conflicts in the future. Please consider traditional mountain bikers have a lot to lose and e bikers who claim e-bikes are not motorized have everything to gain. Please remain resilient throughout this process and understand these are public lands not the industries who gain profits from ebike sales.