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Comments: I represent the Salt Lake Valley Trails Society, Salt Lake County, Utah's mountain bike ("Bicycle") trails group. Our group provides communication, design, maintenance and trail building services to land managers throughout the County. We have about 80,000 enthusiast MTBers in the Valley which to the west borders on the Salt Lake Ranger District of the Wasatch-Uintah-Cache National Forest. With a population of 1.2mil on west edge of the Forest and another 50K on the east side, many who are also MTBers, this area is at the forefront of eMTB use on FS land (see attachment). There has been tremendous growth in MTB and eMTB use brought on by improvements to the technology, events and instruction, high school MTB leagues and the Covid-19 pandemic which has broadly accelerated outdoor recreation, thus we expect the strong growth an adoption of eMTBs to continue.

In general, our group's experience with the eMTBs and trails which they ride on and frequent lead us to the following conclusions:

1. eMTBs do not have a significantly greater impact on the trail tread and features than MTBs.
2. eMTBs, of all classes, are compatible with designated MTB downhill trails.
3. Most of the time, eMTBs of all classes are compatible with MTB designated uphill or rolling trails.
4. MTBs and eMTBs may or may not be compatible with multi-use (hiking, equestrian) trails that are ridden downhill.
4. eMTBs may or may not be compatible with multi-use (hiking, equestrian) trails that are rolling or ridden uphill, and it may depend on the Class.
5. Class 2 eMTBs may have additional safety concerns as the level of fitness required to access remote locations or higher elevations and steeper terrain is much lower.
6. Class 3 eMTBs may have additional safety concerns due to higher speeds, especially on uphill or rolling terrain.
7. The overwhelming number of eMTBs sold in the US are Class 1.
8. It can be difficult to discern what Class a particular eMTB falls into with merely a visual inspection.

With regard to the particulars of FSM 7700 and 7710, we support the inclusion of eMTBs into the Forest Service Travel Management planning. We support objectives and definitions in the 7700 amendment. 7710 proposes a new motorized class for eMTBs, which we support, but the general overlap with MTB trail usage may create an information and mapping gap. It may also create a functional gap, as FSM 7710 et. seq. have a travel/transit/motorized vehicle emphasis which may not address the recreational way (e.g. repeated laps on the same area) in which trails are used by eMTBs. It may also create confusion in the analysis for multi-use trails where eMTBs, especially Class 1, might be compatible with non-motorized trail users. Because of safety concerns, it may be appropriate to consider prohibiting Class 2 and Class 3 eMTBs on natural surface non-motorized trails. Thank you for your good work and careful consideration of this issue.