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Title:

Comments: Thank you for the opportunity to comment on this important issue. I am a Back Country Horsemen who represented the Washington State organization during the legislative process that passed the state e-bike bill. I worked to get the language in it that gave agencies the right to keep classes of e-bikes off soft-surface trails. As a horseman, I wanted to know the limitations of using e-bikes, so I purchased a higher end Class 1 e-bike and put it through its paces including crossing much of the State of Washington on the Palouse to Cascades Trail, commuting to work daily on the Olympic Discovery Trail, and exploring logging roads and motorcycle trails open to e-bikes. I found the bike very useful and appropriate on wide rail-trails that served a dual purpose as transportation and recreation corridors. I found it less adapt at negotiating steep downhills on sharp cornered soft surface trails, in fact, I ended one such outing with a trip to the emergency room for stitches when the mountain bike rear tire slipped away under the added weight of the motor and battery. At these times, even a Class 1 bike is more of a light motorcycle than a regular bicycle due to the poorer steering and heavier weight. I ride and pack horses and would not want to be on any narrow trail with horses in these circumstances.

My points are as follows:

I support the 3 class e-bike system being added to the USFS code (Revised FSM 7700) which establishes consistency in definitions with most states that have adopted this standard.

Revised FSM 7710 Travel Planning:

I support the added category to MVUM for identifying trails open to e-bikes but not other motorized uses (class designations can be 1, 2, and/or 3). (FSM 7711.3 Subsection 6g).

I support the general statement about e-bike considerations in planning policy (FSM 7715.03 Subsection 9).

I have serious concerns over the Criteria being added in FSM 7715.5, particularly Subsection 4. Trails open to e-bike use should have a different design standard than bicycles that do not have a motor assist. I also feel that in no cases should throttles (Class 2 e-bikes) be allowed on non-motorized trails. I have seen many of these on rail-trails, and they are often used more like scooters than bicycles, which is immediately apparent since the pedals are not used even when going uphill. Subsection 4 is more appropriate for Class 1 only, and even then, only for wide surface trails or trails with exaggerated turns, gradual elevation gain/falls, and clear sight distance. This rules out most all mountain trails.

I would add that many backcountry trails are maintained supplemented by Recreational Trails Program (RTP) grant funding from highway gas tax. RTP is divided into allocations for motorized (30%), diverse (both) (40%), and non-motorized (30%). This non-motorized is an FHWA category (not USFS or DOI) and excludes e-bikes. Trails paid for with the non-motorized share would be closed to e-bikes, and bicycle trail advocates could be restricted from using this share of RTP funds.

Law enforcement will be mostly impossible due to indistinguishing features so e-bike management will mostly be based on signage and self-management. Good signage is essential, and most trails aren't signed one way or another at this point.

An e-bike supporting change I would recommend to Subsection 4 is that the exceptions to e-bikes being banned on National Scenic Trails should include when considering Road and Trail Jurisdiction Coordination (7715.72). I am very familiar with a National Scenic Trail which shares a short segment with a County trail that does allow e-bikes on that segment. It is the only realistic non-road route for the NST for the foreseeable future, and the senior-rights held locally allowed e-bike use is not a distraction for the purpose of the overlaying USFS managed NST.