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Comments: As an avid mountain bike, former US Forest Service trail crew worker, and a person concerned with non-motorized trail access, I oppose the Proposed Directives FSM 7700 and FSM 7100 which classifies e-bikes into three classes and paves the way for motorized recreation on designated non-motorized trails.

To be clear, my opposition is not to electric, motorized bike use but to allowing this motorized equipment on non-motorized trails. Currently e-bike users "are allowed on approximately 60,000 miles or nearly 40 percent of trails on national forests and grasslands. These vehicles are also allowed on thousands of miles of roads on national forests and grasslands..." (fs.usda.gov/visit/e-bikes). This is great news for these motorized users, why is there a push for more?

The bike industry is seeing sales climb due to many reasons but they have found that the e-bike will do the most to improve their bottom line. In Forbes magazine, Ian Kenny, Specialized global marketing leader says, "The growth in e-bikes is even accelerating at a faster pace. The e-bike is on this exponential curve." As this segment of the industry explodes, the bike industry is working to equate motorized, e-bike use with the sport of mountain biking, hoping to capitalize on sales to mountain bikers in their quest to increase their bottom line.

I hope bike industry companies continue to make a profit but not at the expense of the sport of mountain biking and our access to non-motorized trails.

Mountain biking, cross-country biking in particular, has always been known as a hard sport but with great rewards and a sense of accomplishment. Sometimes you have to pedal a 25 to 30 pound bicycle uphill over rocks, roots, and steep grades on a trail that was not originally intended for mountain biking. Although many of us enjoy this challenge, mountain bike organizations across the country have worked to develop bike-specific trails that area easier and accessible to all. The influx of easier trails in many places allow all users to enjoy the sport regardless of their fitness and skill. Using these beginner trails, people can hop on a bike, learn skills like proper braking and mountain bike etiquette, and if they like it, gradually progress to harder trails. The argument that e-bikes increase access for all is invalid. The variety of trails that are found across the country already do this...no motor required.

The system of progressing in the sport based on trail difficulty has seemed to work in the past. Before a rider has the skill to descend a 15% grade trail without skidding, they have progressed on easier trails and learned how to brake on purpose-built low-grade trails. Now with e-bikes, people without the learned skills will be able to make it out onto trails above their ability and deeper into the backcountry. This has a negative effect on the sustainability of our trails.

We can look at the effect of other high use trails in which people are shuttled or take lifts to the top to descend. Two examples are the Two Elk trail near Minturn, Colorado and the 401 trail near Crested Butte. Both trails have seen increases in use year-to-year due to lift or shuttle access and both trails have been obliterated with brake bumps (the result of skidding), off-trail riding, and blown out corners. The US Forest Service can't control how these trails are accessed but to advocate for e-bike use on non-motorized trails (the intended or unintended consequence of this directive) we will see exponential growth in trail use, trail damage, and impacts to wildlife.

Non-motorized users, non-mountain-bikers, and wilderness advocates have every right to be concerned. The mountain bike community has worked tirelessly over the past ~30 years to gain trail access, give back to the trails and make sure others in our community treat other users with respect. With an increase in bike use in general, this is already a tough task. Many people are entering the sport with little knowledge of trail etiquette,

and the responsible people of the mountain bike community are playing catch-up to educate these people to maintain trail access and keep good relations with other users. This is without the proposed directive that seeks to pave the way for thousands and thousands of motorized e-bikes on non-motorized trails. There is simply no way to get a handle on the education of this sort of exponential use on our non-motorized trails.

The bottom line is this- The push to bring motorized use to our non-motorized trails is driven by the bike industry and money. Recent trail building efforts have increased accessibility to the sport for all users. Motorized, e-bike use on our trails will nullify all of the efforts that mountain bikers have made to be able to access trails. This motorized use will degrade our trails and the sport.

As a former USFS employee, I know that there is simply not the resources to regulate a three class e-bike system. As smaller batteries and motors come online, it is getting tougher to distinguish a mountain bike from a motorized, e-bike. How could the USFS possibly enforce any e-bike classification? It is best to keep it simple and to keep our trails to their intended use- A bike with a motor is motorized and mountain bike without a motor is non-motorized. To do anything else is unenforceable and will damage the sport and trails that we love.