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First name: Steve

Last name: Stewart

Organization:

Title:

Comments: 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.

While this is a complicated issue the core of the argument is that class 2 and 3 eMTBs should be classed as motorized because they have a throttle and do not require the rider to pedal or exert any effort. Conversely, class 1 eMTBs should be classified as non-motorized as the user has to pedal and put forth significant effort in order to ride.

Class 1 eMTBs are speed restricted in regards to pedal assist. In my experience they do not appear to be any different than a traditional MTB in regards to trail impacts. Additionally, class 1 eMTBs allow older riders to continue to engage in mountain biking while maintaining fitness. Class 1 eMTBs can also help those that are less fit engage in mountain biking, helping new riders become more active and healthy while enjoying their public 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 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 the willingness to engage with the mountain bike community.

Sincerely,
Steve Stewart
Chico, CA