

Data Submitted (UTC 11): 10/23/2020 2:54:48 AM

First name: Steven

Last name: Oxley

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.

Below I have copied a "suggested comment," which I agree with, but I have some thoughts of my own to add. I think that class 1 e-bikes should be allowed on non-motorized trails. I understand that technically they have a motor, but they are very much in the spirit of non-motorized bicycles. I do not own an e-bike, but my wife does, and we have been able to enjoy many trails together that we would not have been able to if she didn't have the e-bike to keep up with me. I think of class 1 e-bikes as similar to a motorized wheelchair (which are also often allowed on non-motorized trails), since it technically has a motor, but it doesn't function in the same manner as other motorized vehicles.

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,

Steven Oxley