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First name: Jonathan

Last name: Wheaton

Organization:

Title:

Comments: I have been involved in mountain biking as a recreational user since 2002, and actively involved as a volunteer in building and maintaining multi-use trails all over Maryland since 2004. While the paragraphs below were drafted by the International Mountain Bike Association, I agree with them whole-heartedly. I firmly believe Class 1 eMTBs should be allowed on trails classified as non-motorized, as that will allow a large class of users to participate in this wonderful activity who otherwise would be excluded due to any number of disabilities or frailties. More people riding bikes = a healthier population = a better world.

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,
Jonathan Wheaton