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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 the management of electric bicycle (e-bike) use on National Forest System 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.

The mountain biking community understands that eMTBs present a unique challenge to the current understanding of motorized and non-motorized vehicles. However, due to the unique nature of many existing trails, the additional power provided by a class 1 eMTB only serves to reduce the effort necessary to surmount difficult obstacles and uphill terrain. This permits less physically fit riders to engage with highly demanding terrain without endangering themselves or traditional mountain bikers. Many riders simply refuse to ride eMTBs, and thus their introduction has not and will not alter the nature of trails, which continue to be used primarily by non-motorized users; however, granting trail access to all motorized vehicles will fundamentally alter the nature of the trail and endanger the trail's primary users and maintainers.

In conclusion, while land managers should be given the opportunity to permit or deny trail access to class 1 eMTBs, they should be granted a general exception to ride non-motorized bicycle trails unless explicitly denied access. Class 2 and class 3 eMTBs should be banned from non-motorized trails, as both of these are significantly more powerful than class 1 eMTBs. This arrangement will allow trail users to continue to enjoy trails safely while maintaining the current funding arrangements.

Thank you for your willingness to engage with the mountain bike community.

Sincerely,

Thomas DeWitt