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First name: Kathleen

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Organization:

Title:

Comments: Dear Forest Service Managers,

I am commenting on the proposed FSM 7700 and 7710 changes that would lump e mountain bikes (eMTBs) into the "motorized" category for trail designations. I worked for the Forest Service for over 32 years, most of that building, maintaining and managing recreation trails, campgrounds and wilderness on the Mt. Hood NF. I am a hiker and a mountain biker and volunteer with Northwest Trails Alliance and AntFarm Youth Trail Crew near Mt. Hood to build and maintain trails and acquire grants for mountain bike trails. I am 62 years old and considering getting an eMTB in the future.

I must disagree with your definition of the word "bicycle" as being "solely human powered". The fact is that mountain bikes now have full suspension, up to 30 gears, and other parts that "assist" a trail rider with powering their bike. While we have newer bikes, we still have our 33-year-old 1987 Stump Jumper and Trek 830 mountain bikes with few of the modern amenities and they require much more "human power" than our newer mountain bikes!

The Class 1 eMTBs provide slightly more assistance, but still require human power pedaling, unlike any kind of motorcycle or ATV which requires sitting and turning a throttle. Class I eMTBs should be considered as "bicycles" and should be regulated the same as mountain bikes on non-motorized trails and not forced onto motorized trails. eMTBs and mountain bikes have identical impacts on trails and similar noise levels, whereas dirt bikes are loud, emit gas fumes and go much faster than 20 miles and hour. Riding an eMTB with Class I ATV's and Class III motorcycles is a completely different experience than riding on a non-motorized trail with other mountain bikes and is ripe for increased user conflicts. The best practices and design guidelines are also far different for motorized ATVs and dirt bikes verses Class 1 eMTBs and other mountain bikes.

Over the last 20 years, I have acquired hundreds of thousands of dollars in grants to build and reconstruct mountain bike trails. While working for the Forest Service, I also got grants for OHV/ATV trails. The funding source for OHV and ATV trails in Oregon, are derived from ATV permits and gas taxes. eMTBs do not require these permits, nor do they use gas. Trails open to eMTBs would not be competitive for grants under those motorized trail programs.

Having worked both sides of the manager/volunteer user categories, I know that volunteer user groups, are critical to building and maintaining our trail infrastructure. We need to work with our partners and user groups to ensure that they are motivated to carry the water on our extensive trail program workloads with diminishing Forest Service funding sources and personnel. Let's keep mountain bikers together.

Mountain bikers come in all shapes, sizes, ages, gender and abilities. There is considerable difference between 62-year-old me, slowly slogging/walking my way up some hill and some twenty something riding up that same steep mountain bike hill. There are equal disparities in someone riding a \$300 mountain bike and a \$10,000 mountain bike with all the latest assistive components. These differences are lessened slightly, when folks like me, may be slightly helped with the improved technology of eMTBs or costlier components. We still need to pedal hard to get up the hill. The "e" portion does not magically eliminate the hard work required. Please keep Class I eMTBs under the same category as mountain bikes and open to designated non-motorized trails that allow mountain bikes. Thank you for the willingness to engage with the mountain bike community.

Kind Regards,  
Kathleen Walker