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Organization:

Title:

Comments: I understand that the sum effect of the proposed rule would change non-motorized trails into motorized classification by allowing eMTB bikes (i.e., Class 1 eMTB). I cannot think of anyone who would find this beneficial. A Class 1 eMTB adds a small amount of wattage-assist, and in my experience, are primarily used by older riders when on single-track trails. These bikes are nothing like true motorized vehicles, e.g., gas-powered dirt bikes or bikes propelled exclusively on electric power that require no physical output from the rider. Please DO NOT take any action that would cause non-motorized MTB trails to be accessed by motorized dirt bikes. EMTB bikes (the kind that still require pedal-assist from riders) should be treated precisely as regular bicycles.

I literally cannot think of any group of trail users --- bikes, motorized, equestrian, pedestrian --- that would be in favor of any action that would re-designate the trails in this way.

I recommend the following simpler solutions:

Adopt Class 1 e-bikes as non-motorized transportation.

Adopt Class 2 and 3 e-bikes as motorized transportation.

Allow Class 1 on non-motorized trails upon completion of an environmental review and public comment process, driven by local forests and/or districts.

Prohibit Class 2 and 3 on non-motorized trails.

Encourage programmatic NEPA review of eMTB impact on non-motorized trails, at the District, Forest or Regional level, to ease the review burden on a trail by trail basis.

Approach eMTB access by using a "Closed Unless Signed Open" basis.

By allowing Class 1 on non-motorized trails on a case by case basis and upon completion of a review process, the USFS offers flexibility at the local level and preserves maintenance funding sources that can be pursued by hikers, equestrians, and mountain bikers to help maintain thousands of miles of trail throughout the United States. Class 1 e-bike technology is quickly becoming ubiquitous, so the above approach also makes enforcement easier and reduces consumer confusion.

It is my understanding that the above approach is also in line with the wishes of People for Bikes, the International Mountain Bicycling Association, multiple mountain bike manufacturers, as well as my own local mountain bike organization, the Evergreen Mountain Bike Alliance.

Thank you,
Colin Prince