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Organization:

Title:

Comments: Thank you for the opportunity to submit comments to your proposed new rules 7700 & 7710.

We are a backpacking and mountain biking family of 4, and especially with children on the trails, we feel it's very important to protect the backcountry experience of our shared non-motorized USFS trails.

We understand that ebikes are becoming more ubiquitous, and that's a good thing especially if it means fewer cars on the streets. But we must proceed with foresight and caution when creating rules about where they are allowed to be used. We're therefore concerned about the current approach to classify ALL e-bikes as motorized vehicles.

The three different classes of ebikes are so different from each other and thus must be differentiated for where they're allowed, especially where non-motorized trail use is concerned.

Class 1 e-bikes are allowed on trails in the state of Washington. If all ebikes are classified as motorized, this solution will jeopardize funding sources to maintain traditionally non-motorized trails. Also, many trails are currently harmoniously shared by bikers and hikers - changing the classification of all e-bikes to motorized will create friction and unnecessary hardship to the community of recreationalists who have a shared system that works. I understand that the current proposals are also cumbersome and require more resources within an already constrained Federal Agency.

I have reviewed various recommended solutions, and I propose the following:

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,  
Iona Park