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Comments: Separate Management Objectives

The USFS proposes to separate management objectives for e-bikes and adopt the Class 1, 2, and 3 classification system.

We support managing eMTBs differently from traditional mountain bikes for the following reasons:

Separating objectives would allow for a non-motorized designation for Class 1 e-bikes which we support.

Separating objectives would allow for a motorized designation for Class 2 and 3 e-bikes which we also support.

Class 2 and 3 should be specifically prohibited from non-motorized trails and only pedal assist eMTBs under 750 watts that cannot be self-propelled should be under consideration for non-motorized trail access.

We do not believe that Class 1 eMTBs require a new class under MVUM. We strongly urge the USFS to manage Class 1 e-bikes as a new non-motorized user group, to avoid jeopardizing existing non-motorized trail status designations.

The three class system is being adopted in states throughout the U.S, and 27 states have now adopted them as non-motorized bicycles. Adopting this same classification by the USFS helps to create consistency between federal land management agencies as well as increasingly more states legislative initiatives, ultimately helping to reduce consumer conflict and create a consistent management objective for eMTBs on trail.