

Data Submitted (UTC 11): 10/25/2020 4:08:40 AM

First name: John

Last name: Traeger

Organization:

Title:

Comments: I would like to submit comments to your proposed new rules 7700 & 7710. While it is important to manage eMTBs on multi-use trails, I don't believe the currently proposed approach to these rules where eMTB are classified as motorized vehicles is desirable or practical.

This solution will jeopardize funding sources to maintain traditionally non-motorized trails. As it does not align with recent decisions made within the DOI agencies it will cause more confusion amongst e-mountain bikers on where they can and cannot ride. Changing non-motorized trails to a motorized designation will create problems and user conflicts. The current proposals are requires more resources to manage within an already constrained Federal Agency.

For the sake of clarity and feasibility I propose the following 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 at the District, Forest, or Regional level, NOT on a trail by trail basis.

Prohibit Class 2 and 3 on non-motorized trails.

Use a "Closed Unless Signed Open" basis for eMTB access.

My proposed solution allows the USFS 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. This approach also makes enforcement easier and reduces consumer confusion.

My recommendation above is also in line with the groups such as the 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,
John Traeger