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Title: Board Chair

Comments: As an advocate working in trail access specifically related to mountain biking, I support the need for updating policy to accommodate eMTBs in National Forest areas.

However, the rules as proposed appear problematic. Defining a class system of eMTBs is important and concurrent with other efforts, but the proposed rule omits the more important detail of treating Class 1 eMTBs as non-motorized for the sake of access and use case. Studies show no difference in erosion or user conflict for Class 1 eMTBs and this should be treated similarly. Our system allows eMTBs and have seen no additional impact to the trails nor conflict since updating to allow Class 1 eMTBs in accordance with state laws.

Our organization does not operate within any National Forest space at this time, but we have close neighbors to our north with trails in the Superior National Forest. Under the current proposed rule they would either have to open their trails to motorized traffic and face great potential damage to the trails via dirt bikes and similar, or restrict access to eMTBs, a detriment to equitable access and recreation.

Again, I support the need for the update, but feel the proposed rule does not sufficiently account for current impact studies and fails to consider recreation partner needs and access of trail users.