

Data Submitted (UTC 11): 10/25/2020 3:48:52 PM

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Organization:

Title:

Comments: First, thank you for the opportunity to submit comments to your proposed new rules 7700 & 7710. As a mountain biker and recently started E-biker, it's important to me that we are careful how electric-assist mountain bikes are managed to protect the user experience of those recreating on non-motorized USFS trails.

I'm alarmed about the current approach to classify e-bikes as motorized vehicles. This is contrary to every other national, state, and international agencies direction or policy for Class-1 EBikes. This would be a confusing counter move and a step backward for access of public forest land to "Most of the citizens" vs. "Only those who are extremely fit and/or fully mobile."

At 48, my friends and I are fit enough to ride a standard MTB; but as I age I see that EMTBs will keep us riding most of our life. That will keep us healthy, happy, and save the health care system money. I've witnessed many times people well into their 70's riding EMTBs on trails where before they would have been on the golf course. This is a massive benefit as the 10s of million riding in my generation move into retirement.

C1 EMTBs also get people into the sport, or into sports/exercise at all. You don't have to start as an athlete to try it. But if they ride, their fitness improves leading to a healthier society. EMTBs can also be a way for kids to find the sport as mine did this summer. My EMTB was fun to him, so he rode frequently. Then he bought his own standard bike and now rides daily in college. That's one more citizen who will tend toward fitness and add to the recreation economy.

Finally, if you haven't already, go ride a modern EMTB like the Specialized Levo SL and compare to a KTM dirt bike. Many shops rent them now because it's the future. To put these anywhere close to the same class is like comparing a poodle to a rhinoceros. I ride mine the same as my standard bike but can now climb as fast as my friends instead of them waiting for me at the top. There is ZERO difference going downhill because you generally not pedaling.

In close, I agree with everything proposed by my local bike club below:

This solution will jeopardize funding sources to maintain traditionally non-motorized trails and, by not aligning with recent decisions made within the DOI agencies, will cause more confusion amongst e-mountain bikers on where they can and cannot ride. More importantly, this solution will pit mountain bikers against hikers and equestrians once a proposal is made to allow e-bikes on a previously non-motorized trail by changing it to a motorized designation. The current proposals are also cumbersome and require more resources within an already constrained Federal Agency.

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,
Steve