Data Submitted (UTC 11): 10/25/2020 5:37:20 PM
First name: Traegon
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Organization:
Title:
Comments: Thank you for the opportunity to submit comments to your proposed new rules 7700 \& 7710. As a mountain biker, it's important to me that we are careful in how we manage electric-assist, but also enable increased access to trail systems for new users.

I'm extremely concerned about the current approach to classify e-bikes as motorized vehicles.

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.
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 "Class 1 Open Unless Posted Closed" basis
By allowing Class 1 on non-motorized trails where mountain bikes are allowed, and limiting access for Class 2 and 3 to only trails where motorized use is permitted.

We should use the learnings from other parts of the world who were quick to adopt consistent policy to enable this type of use as I believe that this approach will improve trail access for many users who would otherwise be limited and do so in a way that would not impact other users.

Thank you,
-Traegon Hon

