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Comments: Grand County Trail Mix is the official entity authorized by Grand County, Utah to plan, design, build, and maintain non-motorized trails in and around Moab, Utah. This area includes such world-famous trails as Slickrock - one of the first mountain bike destinations in the country - which has now become a popular e-bike trail. Locally there are already well over 1,000 miles of dirt roads and trails open to e-bikes; only roughly 150 miles are closed to motorized travel.

As a part of our work, we have significant experience with e-bikes, and with the multiple issues arising from their use on non-motorized trails. We are opposed to some of the provisions in the proposed revision of FSM 7700 Chapters 7700 and 7710. We believe that these changes will cause significant negative impact to many existing trails, leading to increased taxpayer costs for maintenance and repairs, and a decreased overall user experience. Outlined below are the reasons behind this, based directly on our first-hand experience with e-bikes on our trails.

7702 - OBJECTIVES

The revision here states that e-bikes are good "for individuals who might otherwise be prevented from experiencing an NFS trail". With a class 1 or class 3 pedal-assist e-bike that is clearly not true - the rider still needs to be pedaling for the bike to move. The electric assist merely allows them to ride faster. A rider who goes out for one hour on a regular bike might cover six miles; the same rider in one hour on an e-bike might cover twelve - but the rider would have put in the same effort and received the same exercise benefit in both cases.

The revision also does not address the use of e-bikes by perfectly fit individuals who will only use an e-bike in order to travel faster and further than they could otherwise.

We would substitute wording saying that e-bikes make it easier for individuals to experience NFS trails.

7705 - DEFINITIONS

Bicycle - the definition here is technically accurate. However, many disabled people use three-wheeled hand cycles (where the pedalling is done by the arms, and not the legs). We would either broaden the definition of "bicycle" to include such vehicles; or to add a definition of "adaptive hand cycle".

Class 2 E-Bike - we do not feel that Class 2 e-bikes are compatible with regular bicycles on trails. Class 2 e-bikes can be operated without pedalling at all; in fact they can be operated with the pedals removed, solely by using the throttle. As such they are really small electric motorcycles, and not bicycles at all. We would encourage the removal of Class 2 e-bikes from consideration on any NFS trail.

Class 3 E-Bike - a class 1 e-bike can maintain a speed of 20 MPH. The top professional riders in the world, on a world championship race course, can maintain a speed of roughly 12 MPH. A typical rider in average shape will be slower. A rider on the same trail going 20 MPH will be a danger to others; the excess speed of a Class 3 e-bike - 28 MPH - is simply not needed. We would encourage the removal of Class 3 e-bikes from consideration on any NFS trail.

7715.03 - Policy

See comments above under section 7702 on the term "prevented".

We would encourage the addition of wording setting a policy that all trails are closed and off-limits to e-bikes until they are individually evaluated under the listed criteria. In other words, maintain the current status quo of every trail until it has been explicitly approved for e-bike use.

7715.5 - Criteria

Speed differences are listed in section 4 b as one criteria for evaluation, which we agree with. We would also add criteria such as the higher weight of e-bikes; and the lower overall experience and skill level of e-bikers. Individuals that use e-bikes often have lower fitness levels than traditional bikers, hence their use of an electric motor; but there is no electric assist for handling, or braking, or obstacle avoidance. This leads to more frequent off-trail damage when the rider is unable to stay on the designated trail, especially at the higher speeds of e-bikes.

It is not clear from the document changes whether an Environmental Assessment (EA) is required to allow e-bike use, either as a change to an existing trail, or as a part of the required EA in construction of a new trail. We would encourage the addition of wording that explicitly states that an EA is required before allowing e-bike use on any trail.

We would also recommend the addition of adjoining trail systems as a criteria for evaluation. This is mentioned in 7715.72 section 8; but it should be listed as a specific criteria. In our area, the Whole Enchilada gets tens of thousands of riders every year, from all around the world; it is a downhill trail that starts in the Manti-La Sal National Forest on Forest Service land, but ends on BLM land. The use of e-bikes on the BLM portion is prohibited; allowing e-bikes on the Forest Service section will only lead to multiple people breaking the law by continuing on the trail.