

Data Submitted (UTC 11): 10/25/2020 8:40:31 PM

First name: Stephen

Last name: Ralph

Organization:

Title:

Comments: October 25, 2020

Thank you for the opportunity to submit comments to your proposed new rules 7700 & 7710. As an avid mountain biker, it's important to me that we are thoughtful in how we manage electric-assist mountain bikes on trails to protect the user experience of those recreating on non-motorized USFS trails.

The current change in management policy would classify e-bikes as motorized vehicles, and if their use of existing non-motorized trails were subsequently allowed, it opens up a whole can of worms in terms of essentially allowing other mechanized and motorized vehicles on these trails. Therefore, I admit to being personally conflicted about allowing e-bikes on recreational trails currently closed to motorized vehicles. However, if their use was approved I fear it would further degrade our trails by encouraging greater levels of use.

Riders of e-bikes are already using our trail systems at greater and greater frequency, leading to overcrowding and degradation of trail surfaces. I realize that enforcement of the current ban on such uses is problematic at best, but it does seem that some basic signage showing which areas are open to e-bikes and which are not is warranted in the coming seasons.

Classifying all e-bikes as motorized vehicles will likely jeopardize funding sources to maintain traditionally non-motorized trails. Further, it adds confusion amongst e-mountain bikers on where they can and cannot ride, and will be inconsistent with recent decisions made by DOI agencies. 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.

I suggest that the USFS conduct programmatic NEPA review of how eMTB impact on non-motorized trails on a trail by trail basis at the Forest District, Forest or Regional level so that local considerations can be fully evaluated and an appropriate decision can be made.

Thank you,

Stephen C. Ralph

Winthrop, WA 98862