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Comments: As a Colorado resident, avid mountain biker and a conservationist I foresee some issues with proposed language regarding the effort to define the Classes of E-bikes and differentiating between motorized, mechanized and non-motorized use on NFS Trails.

I do not support the change of any non-motorized trails to allow the use of eBikes. The Travel Management Rule defines a Motorized Vehicle as any vehicle that is self-propelled.

While Class 1 and 3 ebikes are not self-propelled and require pedaling to engage the motor, the point of an ebike is to use the motor. The problem here also lies in the fact that Class 2 ebikes are self propelled with a throttle. So for example, if indeed Class 1 e-bikes were classified as "non-motorized" or even if they gained a new unique definition within the updates to FSM 7700-Travel Management Ch. 7700 and Ch.7710, that allowed them to operate on non-motorized trails, the challenge would be enforcing the new rules and educating the public in an effective way. With NFS budgets already seemingly tight, this seems like a big undertaking and one that may be almost impossible. It certainly isn't easy to tell the difference between a class 1,2 or 3 ebikes without thorough inspection. And it doesn't seem unlikely that once the flood gates are opened to type 1 ebikes, that some users will just use a Class 2 or 3 regardless.

Another consideration would be the fact that our trail systems and public lands are already operating at maximum capacity in many areas. The addition of a new user group on non-motorized trails would only cause further degradation of our trails and public lands. And with resources already limited to manage these lands, this seems like a potentially dangerous new user to educate and integrate into the current system. Aside from that, trail user conflict is another potential problem that could very well troublesome and hard to manage.

The current TMR is clear and things have finally started settling down in general between user groups. Mountain Bikers have already overcome so many hurdles in regards to negative stigma, I fear this would lump the current community of mountain bikers in with a new user group that may not be as familiar with or interested in what it means to be a good steward of the land.

Another effect of allowing Class 1 ebikes on non-motorized trails would be the strain it would put on other local entities ie. Town or County Open Space programs, which often partner with the NFS in regards to trail management and stewardship.

I manage an outdoors shop, and while talking with locals and visitors about trail recommendations, it is clear that a majority of trail users don't often know what jurisdiction the trails they are on fall under. This added user on non-motorized trails would put a strain on the land management partners that the NFS often works with locally to create a functional system that the public can understand thru continuity. These local entities typically don't have the resources and staff to manage this added user that will inevitably pour over from the NFS trails that they neighbor.

All this being said, adding language that defines the Classes of ebikes to the TMR and officially adding them as a user on motorized trails would enable the NFS to allow ebike use and still operate under the current trail management framework. This seems like a win for everyone.

Thank you for the opportunity to comment on this contentious issue,
Sincerely, Jeff Carlson