

Data Submitted (UTC 11): 10/24/2020 4:13:29 AM

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Comments: FSM 7700 and 7710 Directives

Thank you for addressing issues surrounding e-bikes. This form of recreation is proving problematic, as users and the industry selling them continue to attempt to redefine motorized to include this motorized use. The changes proposed with FSM 7700 and 7710 do a good job of addressing these issues, but with changes, they could be better.

FSM 7700 - I am in complete agreement with defining bicycles as being solely human-powered, and electric bicycles as a distinctly different class. Beyond that, I think that attempting to manage e-bikes by Class 1 - 3 is a futile effort and that it would be simpler and more effective to consider two groups - solely human-powered bicycles, and electric powered bicycles. The reason for this is that the distinctions between classes 1 -3 are far smaller than the difference between a bike that is solely human-powered vs one that is electric, and modification of bikes will blur the distinctions between classes further.

FSM 7710

7711.3: I am in complete agreement with the change in 7711.3 to add a category for trails open e-bikes, but not other motorized vehicles. This is a needed change and should enable more trails to be designated for motorized (e-bike) use in areas where noise would have previously been an issue.

7715.03 I agree with this revision as well, with the caveat that as a motorized use, e-bikes should be allowed only on trails designated as motorized.

7715.5, item 4 "Specific Criteria and Guidance for Designating E-Bike Use on Trails" - this should be clarified to apply only to trails designated for motorized use (even if the only motorized use permitted is e-biking). This cannot be stated strongly enough - as a motorized use, e-bikes are not appropriate on nonmotorized trails. Additionally, any trail designated such that e-bikes are the only allowed motorized use should be done on a trial basis. E-bike technology is rapidly advancing and the approaches taken by bicycle manufacturers producing e-bicycles are converging with those of motorcycle manufacturers producing electric motorcycles. It is premature to make long term decisions based on what we see today from these categories.

I encourage adding efforts to enforce compliance of e-bike use. In more than 20 years of mountain biking and a lifetime of outdoor activity, I can not recall a user group that has so frequently and flagrantly ignored restrictions on their use.

The changes proposed in FSM 7700 and 7710 are absolutely the right direction for the USFS in managing e-bikes. The changes suggested above would improve them even more.