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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 mountain bikes on trails to protect the user experience of those recreating on non-motorized USFS trails. I'm extremely concerned about the current approach to classify e-bikes as motorized vehicles.

The mountain bike community is responsible for a large part of the natural surface trail infrastructure that exists today on our federal, state and local public lands. Hundreds of organized mountain bike clubs around the country manage thousands of volunteers who work closely with land managers on trail development, trail maintenance, and trail education for all users. Much of this work relies on funding sources specific to non-motorized trail projects.

The proposed directives could jeopardize this funding and increase user conflict if non-motorized trails were to become reclassified as motorized to allow for eMTBs. Instead, the final directive must reconsider how to allow class 1 eMTBs on select non-motorized trails while retaining a trail's non-motorized status, similar to the recent Department of Interior final rule. The final directive can be further improved by following the International Mountain Bicycling Association's management recommendations: managing the three classes of e-bikes separately from one another, and prohibiting class 2 and class 3 eMTBs on natural surface, non-motorized trails.

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 upon completion of an environmental review and public comment process, driven by local forests and/or districts. 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 "Closed Unless Signed Open" basis. By allowing Class 1 on non-motorized trails on a case by case basis and upon completion of a review process, the USFS offers flexibility at the local level and preserves maintenance funding sources that can be pursued by hikers, equestrians, and mountain bikers to help maintain thousands of miles of trail throughout the United States. Class 1 e-bike technology is quickly becoming ubiquitous, so the above approach also makes enforcement easier and reduces consumer confusion. It is my understanding that the above approach is also in line with the wishes of People for Bikes, the International Mountain Bicycling Association, and multiple mountain bike manufacturers.

There is a tremendous amount of inaccurate information that is taken as fact regarding e-bikes and e-bike access to trails on public land; developing land management strategies that takes into consideration the differences in e-bike classification is imperative. Commonly, e-bikes are perceived as a no-effort motorized vehicle. Regarding class 1 e-bikes, this is untrue; class 1 e-bikes do not have a throttle, and thus require rider input, differentiating them from a self-propelled motor vehicle. The UFSF must recognize the obvious difference between a motorized dirt bike (moto) and a class 1 e-bike; to not do so would be remiss.

The value for e-bikes is often perceived as solely for individuals that are physically impaired and gaining access to areas they otherwise could not access. This is untrue; e-bikes add tremendous value on public lands for able-bodied individuals. Class 1 e-bikes allow the rider to travel farther and to access parts of our public lands that may not be accessible on an analog bike. Furthermore, they allow access to recreation without the environmental and noise pollution that are a consequence of combustion engine motor vehicles.

There is a misconception that class 1 e-bikes are rode at faster speeds than analog bicycles, and thus pose more of a hazard to equestrians than analog bicycles. While they have the ability to travel faster uphill, they are no

faster than analog bicycles going downhill, and are often slower. The impacts due to speed of class 1 e-bikes is no different than with analog bicycles.

The growth in popularity of class-1 e-bike must be considered in regards to the financial benefits that bike tourism provides. Mountain biking tourism funnels millions of dollars annually into communities, some rural with a depressed economy. With e-bikes making up an ever growing percentage, the USFS should respond to the growing demand for more places to ride.

Finally, the USFS should look at the lack of user conflict, and lack of any further damage to the resource (land) in current e-bike friendly communities such as Downville, CA, Oakridge, OR, and Sun Valley, ID. In all these locations hikers, mountain bikers, e-bikers, moto bikers, and equestrians are able to co-exist on multi-use trails without issue. Class 1 e-bikes should be classified as non-motorized and allowed to travel as such- it will not increase noise, trail damage, or user conflicts; whereas reclassifying trails as motorized to allow bikes will allow moto use, which will increase trail damage and noise.