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Title:

Comments: Sample Comment:

Thank you for the opportunity for the public to engage on FSM 7700 and 7710, which would revise Forest Service directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System lands.

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.

As an avid mountain biker and an avid motorcycle rider, I truly believe that many areas should be accessible only under human power. I ride mountain bikes and motorcycles in several areas that have a mix of trails that allow motorized vehicles on some of the trails and not on others. The quality and nature of the two types of trails are quite different and I would be able to very quickly and easily identify trails that allow motorized vehicles on them and those that do not just by riding on them for a couple hundred feet. The mountain bike only trails tend to stay much nicer, smoother and narrower where as the trails that allow motorized vehicles on them are looser, more chewed up and have more erosion on them. I certainly appreciate that eMTBs do allow access to some people who normally would not be able to enjoy some of the scenic areas under their own human power but I do think there should be differentiation so that allowing class 1 eMTBs onto some selected trails does not by default open these same trails up to motorcycles and other motorized vehicles.

If this approach were taken, there would still need to be careful consideration of where to allow class 1 eMTBs in order to keep the trails safe and conflict free. On certain trails where 2-way traffic of bikes is permitted, bikers going quickly downhill are able to spot and stop for hikers and bikers that are riding up hill because they are moving 5 miles per hour or slower. If eMTBs were allowed to go up these trails and are capable of going 10-15 miles per hour, it would be very difficult for bikes coming down hill to have enough time to see them and stop for them. In areas with steep and technical uphill riding you could potentially see some conflict or annoyance if eMTBs are zipping around human powered bikes that are slowly struggling to make it up and around obstacles.

Mountain bikers appreciate the leap in technology presented by eMTBs is a unique management challenge. These proposed directives rightfully plan separate management for bicycles and electric bicycles. It is critical that land managers and local mountain bikers work together to determine where eMTBs are and are not appropriate on current and future mountain bike trails.

Thank you for the willingness to engage with the mountain bike community.

Sincerely,

Tom Joyce
Oregon/Idaho biker, hiker and motorcyclist