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Organization:

Title:

Comments: Thank you for the opportunity to submit comments to your proposed new rules 7700 & 7710. As a 60-year-old senior and e-mountain biker, it's important to me that we are careful in how we manage electric-assist mountain bikes on trails to protect the accessibility and user experience of those recreating USFS trails.

Motorized vehicles are very different from electric-assisted bicycles. E-bikes don't require DMV registration and licensing. E-bikes are standard bikes with a small electric motor and battery. This doesn't turn a bicycle into a motorcycle, it just provides limited assistance to the bicycle riders so they can more easily make it up hills and into a headwind. It's still a bicycle, and on many bikes, it's difficult to determine if the bike has a motor these days. The majority of bicycles sold in the US will soon have a battery and electric motor. Please don't ban these new bicycles from the trail system as it will stop the majority of new bicycle owners from using the trails and for older citizens like me will foreclose the ability to ever ride the trails again.

I'm extremely concerned about the current approach to classify e-bikes as motorized vehicles if factually incorrect, these are not DMV licensed motor vehicles, they are 21st century bicycles that have assistance for those no longer strong enough to make it up the hills.

This solution you are proposing will jeopardize funding sources to maintain traditionally non-motorized trails and, by not aligning with recent decisions made within the DOI agencies, will cause more confusion amongst a new generation of e-mountain bikers on where they can and cannot ride. 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. The current proposals are also cumbersome and require more resources within an already constrained Federal Agency.

I recommend the following simpler solutions:

Set speed limits on trails for everyone to follow.

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 Class 1 access as identical as any other bicycle.

By allowing Class 1 on non-motorized trails 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.

Thank you,  
Bruce Burns