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Title:

Comments: 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.

I support allowing e-mountain bikes on any trail that allows regular mountain bikes. Many people who are opposed to e-mountain bikes do not seem to really know much about them, and have made up their minds based on incorrect assumptions. They seem to see them as motorcycles, which they are not.

From my own personal experience as a class 1 e-mountain bike owner, I can say that e-mountain bikes are not very different on the trail than regular mountain bikes. There is a bit of motor whine when climbing, especially under load - but it is not very noticeable, especially when more than a few feet away. It does not even begin to compare to a motorcycle engine, and it is hard to believe it would startle anybody. I still have to use my bell to warn people I am coming. I do climb a bit faster, but unless I am on a road, the limitations of the terrain prevent me from excessive speeds. It is more like I am just a much stronger rider, but it is not like I am on a motorcycle. And, as soon as I stop pedaling, the assist disengages, and it is just like being on a regular bike. Riding easy terrain, and going downhill, the assist generally does not engage, unless I am actively pedaling under load, and I do not go any faster than a normal mountain bike.

Currently, I have knee injuries, and I am not supposed to stress my knee by pedaling too hard. Without my e-mountain bike, I would be unable to ride many of the places I normally go - which include trails currently open to e-mountain bikes, gravel roads, and 4WD roads. And my wife has back and leg strength issues that she thought were going to prevent her from riding at all, so she would be unable to ride without her e-mountain bike. Having e-mountain bikes allows us to continue to ride together, and experience being in the outdoors, off paved roads and out of traffic. It also allows us to shuttle rides without having to drive a car to the trailhead or trail tail.

I do not think e-mountain bikes cause any more trail problems than hikers, regular mountain bikes or horses. The problems I see are caused by people not behaving well, including behaviors such as being rude to others, surprising people on the trail and not giving them space, going too fast for conditions, skidding on downhill and switchbacks, going off trail or braiding trails, cutting switchbacks, and not avoiding muddy trails until they dry. This is about the rider, not the vehicle. Also, from my own personal experience, e-mountain bikes do not spin out when starting, so do not affect the trails in this way. Finally, e-mountain bikes are only 10 to 25 pounds heavier than a regular mountain bike, which is less than the weight variation between lightweight riders and heavy riders, which could be 100 pounds or more, and certainly not nearly the weight of a rider on a motorcycle, which can be several hundred pounds more.

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. Our local mountain bike club has adopted several local trails and done extensive work on them, and I have volunteered many times to help in this effort. Much of this work relies on funding sources specific to non-motorized trail projects.

The proposed directives could jeopardize this effort and funding and increase user conflict if non-motorized trails were to become reclassified as motorized to allow for e-mountain bikes. Instead, the final directive must reconsider how to allow class 1 e-mountain bikes on non-motorized trails that allow regular mountain bikes, 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 e-mountain bikes on natural surface, non-motorized trails.

Sincerely,

Mark Mortier