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Comments: Non-Motorized vs. Motorized Designation:

We believe that that putting e-mtb's into a motorized designation is the wrong approach and is inconsistent with how other land managers are designating e-bikes.

We would recommend that the USFS designate all three classes of e-bikes as non-motorized. At a minimum, we would suggest that any policy revisions should align with USFS 36 CFR 212.1 and designate class 1 and class 3 (pedal assist) e-bikes as non-motorized and class 2 (self-propelled) as motorized.

By distinguishing between the 3 classes of e-bikes, the USFS will be far more effective in their management. Class 1 e-MTBs could be allowed on non-motorized trails upon completion of an environmental review and public comment process, driven by the local forests / districts and their stakeholders. Similarly, the agency could prohibit Class 2 and 3 e-bikes on non-motorized trails.

Non-Motorized Funding:

If the USFS classifies all e-bikes with a motorized designation, it would likely affect future non-motorized funding sources like RTP and NOVA grant funding in Washington State and similar non-motorized funding in other areas of the country. It also has an unintended consequence where any trail that allows a class 1 e-mtb would receive a motorized designation.

NEPA:

While we believe an environmental review and public process is reasonable across a forest or even USFS region, requiring NEPA to consider e-mtb use on EVERY trail is cost prohibitive, impractical and will result in no action. Instead, we would advise a more programmatic approach done at the local level with the local stakeholders to identify where e-mtb use makes the most sense.

National Scenic Trails:

We believe that banning all e-mtb's from ALL National scenic trails is the wrong approach and that a programmatic approach of where and how they can be considered at the local level by the local stakeholders.

E-mtb Growth:

All bike brands either have a class 1 e-mtb in production or are working on releasing them and the e-mtb market will continue to have strong growth into the future. Our suggestions above would help the USFS be in front of the technology as adoption of e-bikes continues to grow for both transportation and recreation purposes.

