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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. Currently, there are 27 states that have classified e-bikes as non-motorized including Washington State. Last week, the Department of Interior released Order 3376 that designates all three classes of e-bikes as non-motorized and class 1 e-bikes trail access will be managed at the local level.

I 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.