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Title: Chair

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RE: Forest Service Manual 7700 Travel Management

Chapter 7700, Zero Code

Chapter 7710 Travel Planning

Thank you for the opportunity to comment on the proposed changes to the directives above as they pertain to the use of e-bikes on non-motorized trails.

The Deschutes Trails Coalition (DTC) is a diverse group of trail users, from hikers to mountain bikers to OHV trail riders, as well as environmental advocates and local business interests, all advocating for an ecologically and socially responsible recreational trail system. By using a collaborative strategy, the DTC ensures trails are shared equitably among a diverse and growing number of trail users, including wildlife while fostering a shared sense of place and community.

We agree with the Forest Service, regarding the designation of three classes of e-bikes on National Forest System lands. These reclassifications will provide clarity for the appropriate use of bicycles and e-bikes on NFS trails and NFS roads. We acknowledge this emerging technology has allowed and will continue to allow new opportunities for individuals who may not have access to National Forest land experiences without the assistance of an e-bike or other electrical motor.

It is encouraging to see the proposed directives require local land managers to perform an environmental analysis before allowing e-bikes on certain trails. However, this analysis needs to be based on fact. At this point, there are no scientifically based, peer-reviewed studies to provide factual analysis of e-bikes on current non-motorized trails and the environment. The impacts of e-bikes from both social and environmental sustainability aspects are unknown.

The DTC calls on the Forest Service to conduct the appropriate scientific studies on the impacts of e-bikes on the current recreational environment. Studies should address user conflicts, trail sustainability, wildlife and watershed impacts, at a minimum. The FS could then make scientifically supported decisions regarding allowing e-bikes on non-motorized trails and would provide guidance to local managers as they apply the NEPA process to determine the scope of recreational e-bikes on the National Forest lands they manage.

Once again, thank you for the opportunity to be a part of these impactful decisions.

Brad Chalfant, Chair

Deschutes Trails Coalition