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United States Forest Service Proposed Updates to Directives that Clarify Management of Electric Bikes Guidance, International Mountain Bicycling Association September 24, 2020

The following is the International Mountain Bicycling Association (IMBA) guidance for the United States Forest Service (USFS) proposed directives on electric bikes (e-bikes) as it pertains to mountain bike interests and electric mountain bikes (eMTBs).

IMBA's Analysis:

Below we have outlined a few points and suggestions based on the proposed changes to the USFS Directive on e-bikes. IMBA will be submitting a formal comment which expands on this guidance before the October 26th comment period deadline.

- In its most basic form, the proposed update to the directive clarifies all classes of e-bikes will continue to be considered motorized vehicles, and will only be allowed on motorized trails and roads and will not be permitted on non-motorized trails.
- If USFS permits eMTBs on non-motorized trails, those trails will then be re-classified as motorized, given that USFS does not, unlike the Bureau of Land Management (BLM), provide an exemption to allow eMTBs on non-motorized trails.
- The proposed update may disqualify and/or unnecessarily restrict available state and federal funding sources, federal budget appropriations, or skew agency trail accounting allocations.
- This proposed update also creates the potential for increased user conflict, as established non-motorized use will certainly continue on newly re-classified motorized trails.

Background and General Information:

- On September 24, 2020, the Department of Agriculture's U.S. Forest Service (USFS) announced "proposed updates to directives that clarify how e-bikes are managed on

national forests whereby creating an e-bike definition and by adopting the three classes of e-bikes for designation as motor vehicles.”

- The comment period will run for 30 days ending on October 26th. The USFS are asking for comments to be submitted through the following link:
<https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2619>
- Currently the USFS classifies e-bikes, including eMTBs, as motorized vehicles due to the inclusion of an electric motor. Therefore current regulation only allows e-bikes (eMTBs) to be used on designated motorized trails and roads, and not allowed on non-motorized trails.
- IMBA encourages all mountain bike organizations and individuals to participate in this public process to help guide the USFS as it addresses this ever-evolving issue.

Proposed Updates to the Directive:

- The proposed update officially adopts the three-class system of identifying e-bikes as class 1 with a pedal assist maximum speed of 20 mph, class 2 with a throttle assist maximum speed at 20 mph, and class 3 with a pedal assist maximum speed at 28 mph.
- Within Travel Management Plans USFS will add the following category to identify classes of motor vehicle use: *Trails open to e-bikes only. Specify the class or classes of e-bikes allowed.*
- The proposed update will add the following for considerations for e-bike use on USFS trails:
 - Whether trails are managed for bicycle use or bicycles are allowed
 - Are the impacts of e-bike use similar to non e-bike use including speed, increased use, and site specific considerations
 - Whether an environmental analysis (EA) may be more appropriate when non-motorized bicycles and e-bikes impacts are comparable
- USFS proposed changes can be found here:
https://cara.ecosystem-management.org/Public/DownloadCommentPeriodDocument/3567?dmdId=FSPLT3_5357607
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IMBA eMTB Position:

Access to natural surface trails for traditional non-motorized mountain bikes is critical to the future of our sport. As technologies evolve, we understand the need to examine access for

Class 1 eMTBs and the unique characteristics they possess compared to traditional mountain bikes. We support trail access for Class 1 eMTBs and support shared use on trails as long as access is not lost or impeded for traditional mountain bikes. IMBA recommends Class 1 eMTBs be managed independently from traditional mountain bikes and we encourage land managers to develop separate regulations. IMBA will continue to engage all stakeholders on this issue in an effort to reach outcomes that best suit all users.