

October 24, 2020

## **USDA Forest Service FSM 7700 and 7710 E-bikes #ORMS-2619**

Dear Director,

Thank you for the opportunity to comment on the Forest Service's proposed regulations governing the use of electric bicycles, or e-bikes, within National Forest Trails and Grasslands

As an E-bike owner, 63 years old, I would like to address my concerns allowing E-bikes on trails designated for traditional pedal bicycles.:

While e-bikes are federally regulated for the purposes of consumer product safety, e-bikes, managed across federal land management agency policies, have regulated e-bikes as a motor vehicle. E-bikes should stay categorized as "motor vehicles" subject to federal motor vehicle safety standards pursuant to 49 U.S.C. § 30102 E-bikes can do 28mph on a straight away with pedal assist motor.

Forest Trails and Grasslands offer a quiet, safe bike riding experience. E-bikes use is controversial and will have a negative effect on other visitors. Traditional bikes are slower, lighter, easier to control and can maneuver quicker to avoid user conflict.

More and more people are using e-bikes, especially those who wish to continue, or start riding a bicycle, but are limited by age, disability or physical capacity. This in itself poses danger, especially motoring into remote trails not open to motorized vehicles. The motor and throttle give users a false sense of security, which would inevitably lead to falls and severe injury. This would be an administrative nightmare. They should be kept off non-motorized trails and out of such areas.

Whether the E-bike is a Class 2, 1 or 3 makes no difference-they are still a Motorized Vehicle, which can operate with or without pedaling; this I know from personal experience with the throttle.

Allowing Electric bikes on non-motorized areas would also open up use to electric scooters, segways, hover boards and other motorized devices.

You will hear from the older, inexperienced riders to change the rules. You are hearing from the bike industry anxious to sell more bikes. You are hearing from People for Bikes, the trade association representing companies that manufacture and distribute bicycles, who want the access; they are not the land managers who have to manage the E-bike users and call Life Flight to get them out of the remote areas.

I ask the UDSA Forest Supervisors to not allow the use of Electric (motorized) Bicycles on the trails.

Thank you for your consideration in clarifying where E-bikes can be used. I strongly encourage their use to roads and not non-motorized trails.

Sincerely, Georgi Douglas