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Comments: Official Comment letter is also attached.

October 20, 2020

Director, Recreation Staff  
USDA Forest Service  
1400 Independence Avenue SW  
Washington, DC 20250-1124.

Dear Planning Team,

The American Motorcyclist Association District 36 (D36) supports agency efforts to revise its directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System (NFS) lands. D36 is a volunteer-based non-profit organization of motorcyclists that supports the designation of public roads, trails, and areas for both motorized and non-motorized recreation.

The proposal also includes new definitions for an e-bike and a Class 1, Class 2, and Class 3 e-bike, as well as guidance and criteria for designating e-bike use on NFS roads, on NFS trails, and in areas on NFS lands.

D36 believes it is important for the OHV and traditional mountain bike communities to work with e-bike enthusiasts, legislators, land agencies, manufacturers, and other stakeholders to support agency efforts to address the rather confusing array of rules and regulations that may actually be keeping people at home instead of helping them enjoy the great outdoors.

Over the last 4-5 years, the D36 government affairs office has been working, writing, meeting with user groups, and attending recreation conferences to discuss e-bike related management concerns, potential conflicts, and find possible solutions to e-bike land-use issues.

One of the main concerns D36 has heard from the dirt-bike community is their fear that land agencies will convert or reclassify some of our highly-valued single-track motorcycle trails to "e-bike only" trails where dirt-bike use would now be prohibited.

The following e-bike concepts are based on many of those aforementioned stakeholder interactions.

**AVOID CONVERSION OF MOTORIZED SINGLE-TRACK TRAILS and OTHER OHV ROUTES** - Currently, e-bikes are allowed on OHV routes because they are also defined as a motorized vehicle. Conversion of OHV routes to e-bike only routes - where historic OHV use would be prohibited - has the potential to cause huge conflicts between affected user groups.

**COMPANION ROUTES FOR E-BIKES** - On land allocations where motorized and mechanized trail use is authorized, consider looking for new trail opportunities where connector or transport single-track trails could be constructed and designated for both e-bike and MTB use within the management prism of designated motorized roads, trails, and areas. As appropriate, also consider designating these new single-track trails as multi-use routes that will allow dirt-bike use. Avoid designating e-bike routes in land classifications where mechanized and

motorized use is prohibited such as federal Wilderness areas.

**E-BIKE USE ON FOREST ROADS** - Authorize e-bike use on Forest roads where motorized use by either street legal or non-street legal motorized vehicles has been authorized. This is especially important where e-bike riders need connectivity between trail systems.

**COLLABORATION** - Trail recreation cultures vary greatly throughout the country. Robust collaboration between diverse user groups and the agency will be important to the planning team. Planning decisions should be site-specific and based on input gleaned from the collaborative process.

**USER FEES** - The agency should consider the use of existing fee authority or, if needed, create a new fee structure and vehicle decal for e-bikes so they can contribute to trail-related construction, maintenance, restoration, law enforcement, and safety/education programs.

D36 believes that e-bikes are here to stay and have become an important transportation and/or recreation vehicle for many who want to get out and enjoy the great outdoors. That reality lends import to this planning process.