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Organization: American Mountain Bike Riders
Title: Policy Director
Comments: Re: FSM 7700 and 7710 E-bikes #ORMS-2619
Electronic submission to
[https://cara.ecosystem-management.org/
Public/CommentInput?project=ORMS-2619](https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2619)

October 21, 2020

Penny Wu?Director, Recreation Staff
U.S. Forest Service?

Dear Ms. Wu:

Attached are the comments of American Mountain Bike Riders (AMBR). AMBR is the only nation organization that advocates for e-mountain bike (eMTB) access to non-motorized natural surface trails.

This is an exciting moment as eMTBs have emerged as a new technology in our sport and for future recreational opportunities of Americans to experience the extensive non-motorized trail systems in our nation. No where else can compare with our backcountry and primitive natural environments on the trails of the National Forest Service, National Park Service, and Bureau of Land Management.

Some others, including the NFS, see only a limited place for e-bikes, perhaps at best, to assist older riders and those with disabilities. That is short-sighted.

eMTBs open new potential for long endurance high-altitude rides, and cross-country traverses. Few places other than in the United States have the vast lands and trail systems for bike riding adventures on this scale. Less than one horsepower pedal-assist bikes also extend access to casual riders who can keep up with a faster riding partners. Families can enjoy the beauty and challenge of backcountry trails together, imprinting an active lifestyle and establishing habits to reduce carbon footprints by getting out of cars and onto bikes to learn about and be part of our natural world.

The NPS and BLM, as well as the majority of states, have recognized the benefits to the physical, psychological, and spiritus well-being of the nation by incorporating and adapting to e-bike technology.

Regrettably, the NFS alone in the entire nation is going the other way. And not just rejecting the choices on management of e-bikes, but basically missing the boat on why the rest of the federal government land agencies and those of the majority of states are incorporating e-bikes as an opportunity and not as a nuisance to be sequestered with dirt bikes and off-road motorcycles.

Nothing demonstrates that more than habit of the NFS of touting the more than 60,000 miles of trails on national forests currently open to e-bike use, but ever mentioning that every mile, indeed every foot, was designed and designated for motor vehicles.

Whenever someone from the NFS repeats that the e-mountain biker should be content to share trails with off-road vehicles with internal combustion engines of 50 to several hundred horsepower and capable of going 50 mph on dirt surfaces, the reaction of most mountain bikers is: The NFS just doesn't get it. The experience we seek isn't power, speed, or roar of an internal combustion engine.

Mountain bikers care equally about the places we ride and the experiences these places provide. Our values are same as hikers, birders, and horseback riders.

So, it is no surprised that AMBR opposes this proposal. It's a non-starter. Doesn't help achieve eMTB access and threatens non-motorized trails.

AMBR does not agree that all e-bikes, regardless of class, should be classed as motor vehicles and restricted to motorized trails.

AMBR also strongly rejects that non-motorized trails should be downgraded to motorized trails as the only way to provide access for e-bikes. Instead, allow on non-motorized trails.

AMBR believes that the NFS should get in step with the other federal land management agencies and the majority of states and classify e-bikes as bikes. The NFS is well aware that the proposal does not "align with

proposed changes at other federal land management agencies." If you believe the proposal does "align" than simply do as you said, and manage e-bikes as bikes not as dirt bikes and off-road motorcycles.

Finally this entire proposal is built on a questionable foundation, at least as to pedal-assist e-bikes. If Classes 1 and 3 are not "a type motor vehicle" under the TMR, then they are not motor vehicles under the new definition proposed. Enforcement of the proposal rule will someday expose its fatal premise, and leave the NFS with no rule in place.

Please see AMBR's attached comments for our detailed analysis and positions on the proposed NFS changes. Thank you for your consideration.

Sincerely,

Armando Menocal

On Behalf of American Mountain Bike Riders

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