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Comments: As a cycling enthusiast who has been riding weekly on Forest Service managed lands throughout the western United States for over twenty years, I am happy to see that the Forest Service is considering the impact of rapidly developing electric motor installations in small vehicles including e-bikes. Given increasing trail use on many of my local trails including the occasional encounter with an e-bike on trail, the safety impact of e-MTBs is my greatest concern.

Thankfully, even on the busiest two way trails in my region, injury's due to on trail collisions are quite rare as downhill riders have sufficient time to brake to a stop or otherwise completely avoid much slower moving uphill riders. Given the ability of an e-bike to go uphill at a rate of speed greater than the average human powered rider, a downhill rider encountering an uphill e-bike rider could have less time to react and avoid a collision. Further, there would likely be significantly increased energy transfer to each rider in the event of an impact due to the uphill speed of the e-bike which may be 20 mph even with the lowest class 1 e-bike.

To prevent the possible increase in injuries on trails limited to human or animal powered movement, it is therefore considered appropriate that the Forest Service proposes a new class of motor vehicle use that addresses very light vehicles with electric motors. Specifically, a class that incorporates vehicles with top speeds, mass and trail impact much lower than current petroleum power motorcycles or other petroleum powered machines. As written in paragraph g. (Excerpt attached) the Forest Service appropriately addresses this new class of vehicle and allows for specific trail definitions.

Furthermore, it would be welcome if the Forest Service considers the development of new rather than the redesignation of existing mountain bike trails for e-bikes. This expansion could be especially appropriate in areas where significant altitude increases are required rather than utilizing ski lifts, car, or bus shuttles. It could also be appropriate for the development of new trails near urban areas where the aural impact of non-battery powered motor vehicle use is a limiting factor but the advantage of electric assist allows a vehicle to more easily navigate loose, rocky, or vertical terrain, less appropriate for a human powered machine.

Lastly, given the rapid development of electric motor and battery technology, it is appropriate for the Forest Service to have already written paragraph h. Special Vehicle Designation. This designation could be used to explore the efficacy of electric motor vehicles which run solely on battery power in Forest Service managed lands and parks which are sensitive to vehicle noise, traffic congestion, road deterioration, and water quality. Perhaps special seasonal use of electric vehicles or limiting the use of certain roads or trails to electric vehicles could improve the overall user experience in a significant number of Forest Service managed lands.

Thank you for your continued service and thoughtful management strategies for these public lands.