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First name: Amy

Last name: Edmonds

Organization: AMPL

Title: Executive Director

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U.S. Forest Service

Director Penny Wu, Recreation Staff

1400 Independence Ave SW

Washington, DC 20250-1124

RE: FSM 7700 & 7710 #ORMS-2619

Dear Director Wu,

Thank you for this opportunity to comment on proposed new directives by the Forest Service regarding the use of E-bikes on the NF trail system.

Let me begin by telling you a little bit about our organization. Advocates for Multi-Use of Public Lands (AMPL) is an organization made up of passionate recreationists. Our focus includes the organization of public support and the creation of a unified voice to maintain and protect broad access to our public lands for motorized as well as non-motorized recreational uses in a cooperative and cohabitant manner. We believe in the co-existence of recreation and conservation for all. We are dedicated to the preservation of public lands for the benefit of, and the multi-use by, our region's diverse recreational communities.

Last August 29, 2019 the U. S. Department of Interior put out Order #3379 regarding e-bike usage in our National Parks and Bureau of Land Management (BLM) lands. AMPL fully supports that order, specifically we support Section 4 (a) which states, "E-bikes shall be allowed where other types of bicycles are allowed."

We believe this best articulates the proper policy decisions around the use of E-bikes, which is why we would encourage the Department of Agriculture to embrace the use of Class 1 E-bikes on all mechanized bike trails throughout the Forest Service Trail System. Specifically, we would ask that Class 1 bikes not be placed under the requirements of 7715.5 -4 Specific Criteria and Guidance for Designating E-Bike Use on Trails. We have several reasons for this request.

As you may know, in Wyoming alone, there are vast opportunities for recreationists to go from BLM lands (which allows E-bikes) to a National Forest Trail System (which allows mountain biking) recreate in the same day. Any decision by individual Forest Service Districts to limit the use of Class 1 E-bikes on trails designated for mountain bikes could lead to confuse, chaos and the difficulty in, and expense of, enforcement.

As well, we believe Class 1 E-bikes are extremely different from Class 2 & 3 because they are limited in speed not based on the motorized maximum, but on the amount of pedaling the cyclist can achieve. Speed, for all three bikes, is also limited, like all mountain bikes, by elevation changes and realistically most E-bikes can only attain their highest possible speed on a low to no grade, paved or hard packed road. Class 1 E-bikes are unlikely to ever achieve a higher rate of speed than those of a mechanized mountain bike on uphill rides, and most certainly will not achieve higher rates of speed than a mountain bike on downhill rides, given the danger in not controlling speed.

We thank the Department of Agriculture for stating clearly under 7702, that one of the objectives of the Forest Service is to "consider emerging technologies (such as E-bikes) that are changing the way people access and recreate on NFS lands."

We believe "access" is one of the key words in this statement as E-bikes provide an opportunity to open more of our public lands to the very people who pay to maintain those lands, including the elderly and disabled. Allowing someone who could not normally enter into back country recreation because of a disability, like a veteran, to use an E-bike to gain that experience, is a goal our federal agencies should be striving to attain. The more people are allowed to recreate on our lands the more they understand why their tax dollars should go to maintain them.

We thank you for your consideration of our concerns and for the work you do to provide access while preserving and conserving our beautiful lands.

Sincerely,

Amy Edmonds

Amy Edmonds  
Executive Director, AMPL  
amy@teamampl.org  
teamampl.org  
307.214.8126

cc: Senator Mike Enzi  
cc: Senator John Barrasso  
cc: Representative Liz Cheney  
cc: Vicki Christiansen, Forest Service Chief  
cc: Mary Moore, District Ranger, Jackson District