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Organization: Blue Ridge Off-Road Cyclists

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Comments: I represent the organization Blue Ridge Off-Road Cyclists. We are a chapter of the International Mountain Bicycling Association. We perform trail advocacy and maintenance in the Roanoke, Blacksburg, and the surrounding areas of Virginia. Our trail maintenance and advocacy spans both the Eastern Divide and Glenwood Pedlar ranger districts. We support allowing class 1 electric mountain bikes* on trails and support classifying all electric bikes as non-motorized vehicles. Electric bikes have been monumentally helpful in completing local trail work projects, especially in the remote areas of the George Washington and Jefferson national forests. Electric bikes have also been critical for ensuring safety and medical staff can get to areas quickly during events such as bike races. Furthermore, our mission is to advocate for trails and mountain bikers everywhere. This includes bikers with disabilities and health issues who otherwise would not be able to ride and enjoy the fruits of our labor. Classifying electric bikes as motor vehicles brings the USFS lands into inconsistency with many other recreational lands. 28 US states follow the 3-class system, and consider electric bikes to be bicycles, not motor vehicles. The policy proposed is also inconsistent with the recent decisions by the NPS, BLM, and nearly every privately owned recreation area**. Many of our constituents utilize electric bikes in areas managed by local municipalities and by the state of Virginia. This rule is certainly going against the grain of the larger trends and thus, is likely to confuse trail users.

I urge you to review the IMBA study I've attached below, as well as studies done by Boulder County in CO, and the University of TN***. Opening up National Forest lands to have studies like this conducted is a massive opportunity to bring real world data to trail impact, something that is desperately needed. I also urge you to visit <https://peopleforbikes.org/blog/colorado-land-managers-are-using-electric-bikes/> and see how electric bikes can help your trail maintainers. Finally, I urge you reading this, if you have not ridden a class 1 electric mountain bike, to try it. You will certainly be surprised, and a smile will come across your face

* An important distinction to know regarding electric mountain bikes, is that every major bike industry manufacturer (Specialized, Trek, Norco, ect.) make only class 1 electric mountain bikes. The bike industry has made the responsible, self-regulatory, choice NOT to produce off road versions of class 2 and class 3 bikes. In any local bike shop around the country, the electric mountain bikes will be ALL class 1. Class 2 and 3 bikes being made by the mainstream bike industry are aimed at road and commuting purposes and do not pose the possibility of being used on trails.

** Massanutten Western Slope, Snowshoe Ski Resort's backcountry trails, ect.

*** <https://www.sciencedirect.com/science/article/abs/pii/S0001457515001992>