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America Outdoors Association offers the following comments to the proposed changes to the Forest Service Manual (FSM 7700 and 7710 E-bikes #ORMS-2619) regarding the use of e-bikes on Forest Service trails. As a trade association with members in the motorized and non-motorized communities as well as the horseback, hiking, and biking communities, AOA has considered many points of view in the development of these recommendations. We hope this input is beneficial as the US Forest Service grapples with appropriate management for the several classifications of e-bikes and how they should and shouldn't access roads & trails on national forests.

E-bikes are motorized vehicles and in forest service management they should be regarded as such. While they are appropriate and attractive options in the appropriate setting, they are not appropriate for use everywhere traditional pedal powered bikes are used. The agency should presume that any expansion of e-bike use onto trails traditionally reserved for non-motorized use will lead to increased user conflicts between e-bike riders and traditional non-motorized trail use groups. Based on this assumption, AOA recommends the following approach to authorizing e-bikes on Forest Service trails.

*When considering the use of e-bikes in an area where they have not previously been permitted, the agency should always engage in site-specific analysis of any changes to (or the development of trails for) e-bikes, unless there is little to no chance of user conflicts or inordinate safety issues.

*While mountain bikes carry similar inherent risks to e-bikes, the potential for e-bikes to carry a less experienced rider onto more technical terrain at a higher rate of speed should factor into management choices. E-bikes are probably not appropriate in cases where speed presents an unacceptable level of risk to participants and other users.

*The expanding use of mountain bikes across forest service resources has worked well where management choices are deliberate and collaborative. Where they are poorly managed, there are tendencies toward increased conflict, and, for the decreased use of a multi-use non-motorized trail

*by hikers and horses when it becomes popular with the mountain-biking community. In most cases e-bikes should not be authorized on trails where horses and hikers are the primary users.

*Class I e-bikes may be appropriate on single-track trails that are designated primarily for mountain bikes, but only if enforcement is available to ensure that Class III bikes are not substituted for Class I bikes. When it is viable to disperse uses across specific user groups (i.e. exclusive to horsepacking or exclusive to bikes and e-bikes), or when it is viable to schedule use days on some trails for specific user groups (i.e. alternating days between bikes and horses), the US Forest Service should consider doing so.

For additional consideration, we offer the view of an America Outdoors members who uses e-bikes for the bicycle tours, including e-bikes on trails:

*In the woods, e-bikes allow someone to cover more ground and since they are moving faster than other users, you now have over-take issues, adding to a sense of crowding. Also, many of these people probably should not be where they are using them, thus a user may be out of their element both physically and base on resource knowledge.

There are similar problems on rails to trails and other popular biking trails. Using them in our tours, they add an

additional dimension of people problems. Commonly a client who is a biker really wants their partner to come along. They believe that an e-bike will be the solution for the non-biker, but it does not often work out that way. We have had a significant uptick in injuries in this user.

*E-bikes are heavier and harder to balance, and therefore not compatible with a user who is on a traditional bike. In addition, the extra speed changes how to ride, and once again new users have more trouble adapting to this. Finally, there are social issues around someone who is not a "biker" and does not understand etiquette, for example, and does not yield to other participants.

Thank you for considering the America Outdoors Association and other user groups' comments in the development of these proposed changes.

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