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Comments: I do not support the forest service proposed changes in their current form. Specifically, I have issues with the following:

FSM 7700 define a Motor Vehicle as

"Any vehicle which is self-propelled, other than:

a. A vehicle operated on rails; and

b. Any wheelchair or mobility device, including one that is battery-powered, that is designed solely for use by a mobility-impaired person for locomotion and that is suitable for use in an indoor pedestrian area (36 CFR 212.1)."

By this definition, a type 2 e-bike is clearly capable of being a motor vehicle and should be regulated accordingly.

Creating a new e-bike definition doesn't negate this fact.

I do not support having a separate e-bike category on a MVUM. Type 2 e-bikes would be permitted to use motorcycle trails, and the others would be permitted on allowed bicycle trails.

On a more general note, there appears to be a disconnect between the proposed regulation and the current regulation of motorcycles. It seems that e-bikes are being given significantly more favorable treatment, and I would urge the NFS to more carefully review the existing and proposed regulations to align them more closely.

All that said, I can see the value of a type 1 e-bike for many FS users, and believe they should be permitted on existing bicycle trails with very limited exceptions. I oppose the use of type 2 or 3 e-bikes on any bicycle trails without exception. The fact a type 2 e-bike is a motor vehicle and that a type 3 can reach speeds more comparable to a motorcycle means they should be confined to those trails.