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Title:

Comments: The most important thing is that e-bikes must be treated as a separate user group from mountain biking. While adding e-bike access has many positive aspects, it also comes with risks. As a mountain biker, I do not want to see the loss of access or future access challenges due to e-bikes. If e-bikes create issues, we need to be able to exclude them as needed without impacting mountain bike access. If new trail access or development is not appropriate for e-bike access, then trails need to be able to be developed without e-bike access.

Concerns and comments with.

- 1) E-Bike speeds and power are limited by firmware. How and who will enforce e-bike regulations with respect to class? How will modified e-bikes be prevented from accessing the trails.
- 2) E-Bikes are a new user group. If there are issues with E-Bike riders, the current mountain bike advocacy groups will not likely be able to help manage this new user group.
- 3) There are many multi directional trails. E-Bikes have the potential to increase closing speeds between trail users and cause additional trail conflict.
- 4) Across the USA, we do not have enough trails as it is. If we add another user group to the mix, without more trail access, this will result in more trail conflict. New trails will need to be developed that take e-bikes into account in the design of the trail.
- 5) As a mountain bike advocate, search and rescue is a topic often used against mountain bike trail development and access. E-Bikes allow less experienced and fit riders to get further into the back county and increase the risk of search and rescue. How will the BLM prepare for the additional search and rescue needs.

E-Mountain Bikes do provide the opportunity for many to get to experience the outdoors and there should be a place for their use. While E-Mountain Bike Advocates talk about older or physically challenged riders getting to recreate, the bike industry is pushing E-Mountain Bikes to young fit riders by promoting aggressive riding. I would be much more comfortable with a model that would allow riders to apply for E-Mountain Bike permits based on the need due to physical disability.