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Title:

Comments: I have been riding bicycles on national forest land for 45 years. The reason is that my parents both worked for the USFS, and I grew up on lookout towers across the country, living in USFS cabins. Additionally I raced mountain bikes professionally in the 80's and 90's, and now design and build bicycles, including e-bikes. This makes me an expert in the field. I have also designed and built trail professionally, and as a volunteer. With that being said, I have several comments related to the proposed rule changes. In 7711.3, the designation should be for Class 2 e-bikes only. The reason is that they have a throttle, therefore they fall in the category of a motorized vehicle. Class 1 and Class 3 e-bikes do not have a throttle, and cannot achieve speeds higher than a conventional bicycle with similar gearing can be pedaled. Due to this fact, class 1 and class 3 bicycles are no different than any other bicycle, and should be allowed on the same trails as any other user. We have thousands of miles of riding data to back this up. Bicycles do not impact trails any more than foot traffic does, and far less than horse traffic. E-bikes do not have any additional impact to the trail over an analog bicycle. If a member of the USFS would like to discuss this and see examples, I am happy to have that discussion with them.