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Comments: Thank you for the opportunity to comment on the proposed changes to the travel planning directives. Electric bikes have indeed become a popular form of recreation with increasing questions raised about where use of this new technology is appropriate on the National Forest. The lack of clear guidance has been problematic thus I welcome the effort to clarify direction regarding e-bike management.

The directives include three key aspects that must be preserved in the final:

- 1.All classes of e-bikes must remain classified as motor vehicles so that a designation process is necessary to authorize this use beyond what is displayed on current MVUMs. Additionally, the technology is changing so fast that the gap between an e-bike and an electric motorcycle is rapidly closing with some e-bikes now capable of speeds up to 45 mph. The trend is clearly towards more power and speed, thus the need to keep e-bikes in the motor vehicle class. It would also help to clarify that e-pack wheels or electric game carts would be considered equivalent to Class I or II e-bikes.
- 2.Adding a separate class for displaying routes open to e-bike use on the MVUM is helpful.
- 3.The designation process must include the requirement for site-specific environmental analysis with opportunities for public comment at the local field unit level.

As with any new technology, the question around where such use is appropriate and how the use should be managed is important. Stewardship and sustainability deserve as much attention as do providing access and new opportunities. Within the agency's multiple use mission, not every use should occur on every acre (or on every trail); the overriding principle must be sustainable use. This means careful consideration of the environmental, social and economic/managerial implications of accommodating e-bike use in concert with all the other existing uses of the National Forest. As currently written, I don't believe the directives put enough emphasis on the three pillars of sustainability. This point could be strengthened in the directives as well as the need to tier to desired conditions for a particular area.

E-bikes have the potential to make trails accessible to more people, but this fact means that overall bicycle use will likely increase, potentially in areas that already struggle with congestion and conflict unless long-term sustainability is carefully considered. The key concerns I have are:

- 1.Social conflict and potential collisions resulting from negative bike-horse interactions, bike-hiker interactions (particularly considering the rapid growth of older people regularly walking Forest trails), and bike-dog interactions. Most bicyclists do not intend to harm others but the differential speed on shared-use, single-track trails with limited visibility makes some negative interactions unavoidable which hardly achieves the objective of providing quality experiences.
- 2."Conflict" incidents with wildlife - bears, moose, lions - due to higher potential for surprise encounters.
- 3.Staff capacity to adequately enforce regulations and manage use in the face of continuing budget declines. New funding sources must be found to bolster planning, management and enforcement. Adding e-bikes to the already increasing recreation use in many National Forests will require more intensive management including more separated use trail systems. Many states require registration permits for motor vehicle travel on the National Forest. Encouraging States to add e-bikes as a separate class of OHV with a similar permit requirement could go a long way towards making planning and management possible.

The proposed directives partially address these concerns in the criteria: "For trails that are managed for bicycle use or where bicycle use is allowed, the extent to which effects from e-bike use are comparable to effects from existing bicycle use, accounting for, as appropriate, differences in speed; potential effects from increased or concentrated use; and any site-specific considerations." However, the proposed criteria also include the statement: "Consider designating a class or classes of e-bike use, as appropriate, on NFS trails managed for

bicycle use or where bicycle use is allowed, where effects from e-bike use would be comparable to effects from bicycle use."

I would suggest that this second statement be deleted as it is duplicative and suggests that e-bike use should be considered on any trail that bikes are currently allowed, without accounting for other factors noted in the previous paragraph.

The criteria in the directives should be strengthened by spelling out considerations beyond trail management objectives, potential increased use, and differences in speed to also include the potential for social conflict, potential for negative wildlife interactions, and the ability to manage and enforce e-bike trail designations.

The directives should also be strengthened by providing more guidance on where e-bikes are not appropriate as well as where they might be particularly appropriate. Obviously, e-bikes are not appropriate in Wilderness (where bicycle use is already prohibited) and, as noted in the proposed directives, e-bikes are not allowed on National Scenic Trails unless there is a regulatory or enabling legislative exemption. I believe the directives should also state that e-bikes are not appropriate in Wilderness Study Areas and in areas of recommended wilderness.

The directives should also note that, in accordance with the policy of encouraging more e-bike opportunities, e-bike use may be particularly appropriate at Mountain Resorts, on National Recreation Trails, and on Level 1 roads (that are currently closed to motor vehicle use but may provide ideal opportunities for e-bike adventures including bike-packing).

Respectfully,  
Linda Merigliano