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Title:

Comments: We are submitting comments about proposed changes to the directives above on behalf of Oregon Equestrian Trails, a non-profit 501(c)3 whose 700+ equestrian trail-riding members volunteer to maintain non-motorized trails.

The Forest Service's decision in the late 1980s to allow mountain bikes on nearly all non-motorized, non-Wilderness trails has significantly marginalized equestrian trail riders, jeopardizing our safety and reducing our enjoyment. We do not want decisions about e-bikes to make this situation even worse.

As you are no doubt aware, conflicts between mountain bikes and horses occur frequently. A speeding bike rounding a blind corner can spook even the best-trained horse, causing it to whirl way from danger and put its rider in the hospital. Every encounter between mountain bikes and horses represents a genuine risk for equestrians.

We are happy to see that the proposed directives and guidance will require local managers to do an environmental analysis before considering opening a trail to e-bikes. We value the opportunity to comment on any such proposal. We recognize that some trails can be safely shared, while others cannot. We appreciate that you plan to make decisions about Forest Service trails on a case-by-case basis.

Our concerns about e-bikes are:

*e-bikes can travel much faster -both uphill and downhill-- than is safe on trails shared with hikers and horses.

*Many of our non-motorized trails are already overcrowded. Allowing e-bikes on these trails will worsen the situation.

*E-bike technology will evolve, allowing manufacturers to build lighter bikes with longer-lasting batteries. The e-bike of the future will reach remote areas that are currently inaccessible by e-bikes.

*As the technology improves, we expect the market for e-bikes to shift from older-people enjoying the outdoors to include younger riders seeking speed, challenge, and thrills.

Therefore, we urge you to make the following modifications to your proposal concerning non-motorized trails.

- 1.Limit e-bike use on non-motorized trails to Class I and II only.
- 2.Expressly prohibit trail use by any e-bike that has been modified to travel faster than 20 mph.
- 3.Limit the use of e-bikes to those trails where ALL sightlines are long enough to allow a bike traveling downhill at speed to come to a complete stop before reaching an approaching trail user.
- 4.Require local land managers to conduct an environmental analysis for each non-motorized trail -- not a blanket EA for all trails in a given area -- before e-bikes are allowed. The public needs to have the opportunity to express its views about the appropriateness of e-bike use on each trail.
- 5.Educate e-bike users about proper etiquette for sharing the trails.

On trails that do not currently meet the standard outlined in #3 above, we urge you to require modifications to the trail before opening it to e-bike use. The Drive and Stay Alive website estimates that stopping distance for an automobile traveling 20 mph on dry pavement is about 80 feet. (<https://www.driveandstayalive.com/stopping-distances/>). Research is needed to determine the distance required for an e-bike or mountain bike to stop, given such factors as speed, elevation change, soil type, and trail conditions.

Please do not allow the proposed regulation to accommodate e-bike riders at the expense of the equestrian trail community.

Thank you for your consideration of our views.