

Data Submitted (UTC 11): 10/17/2020 3:30:13 AM

First name: JOHN

Last name: OLSON

Organization:

Title:

Comments: As a general proposition, I think allowing broader E-Bike access to National Forest trails is a very good thing indeed. Further, I would suggest that the cleanest, most-conflict-free and simplest-to-manage way of doing this would be to treat Class 1 and Class 2 E-Bikes as being no different, from a regulatory standpoint, than any other standard bicycle.

Specific comments on proposed changes:

7702.8 and 7715.03.9: I support your willingness to consider technological changes. This is probably not the last time technological change will come up but now is the time to consider E-Bikes, which I strongly favor. It is abundantly clear to me, through direct personal experience, that E-Bikes open up a plethora of outdoor recreational experiences that would otherwise be closed off to those of us that are elderly, infirm, or otherwise less than perfectly fit.

7705 - DEFINITIONS: Electric Bicycle (E-Bike) ... These definitions seem consistent with many of the various states' definitions I am aware of (including my own, Arizona) so I'm not inclined to nit-pick them. I would note, however, that the main reason for identifying different classifications here would be to separately regulate them. For safety reasons, if no other, I would strongly argue against any differentiation between Class 1 and Class 2 E-Bikes; see below for my reasoning on this. Other than having to draw a line somewhere, the merits of having a separate Class-3 are not clear to me; regardless of merit or lack thereof, it seems to be a regulatory "done deal" and probably not worthy of further debate.

7711.3.6.g Trails Open to E-Bikes Only. I do not support the development of E-Bike only trails. Rather, I am of the opinion that an E-Bike should be treated as a standard bike (as is the case, at least, here in Arizona); dedicated E-Bike trails only add complexity and needless differentiation and administrative headaches.

7715.5.4 Specific Criteria and Guidance for Designating E-Bike Use on Trails. I would suggest that you add a criterion that requires a consideration of E-Bike practices and regulatory standards in civil jurisdictions adjacent to a NF and to extend those practices on to the local NF trails where practical. While this is particularly pertinent to situations where a local civil trail extends into a NF (per 7715.72.8 On routes crossing multiple jurisdictions ...), maintaining a common designation for similar trails throughout any particular NF could dramatically reduce confusion among local riders.

General Comments (RE: the eventual implementation of these regs):

Class 1 vs Class 2 E-Bikes: There is no regulatory differentiation between these two classifications here in Arizona. I think this makes a great deal of sense as there are little to no significant performance or appearance or noise differences between these bikes. And while there seems to be many advocates for Class 1 E-bikes (per my random sample of comments you've received), I would submit that having a Class 2 throttle at hand can make a huge difference when trying to ride a rutted and washed-out or rocky trail. I've been able to ride up some trails with a throttle that would have been impossible for me otherwise. While it's a truism that you should never ride down a trail that you cannot ride back up, it does happen - more than most of us will admit - and it's more likely to be a problem if you only have pedal assist.

E-Bikes vs standard bicycles vs Engine-driven vehicles (Motorcycles/OHVs etc.): It is also clear to me, again through direct experience, that there is less potential for conflict between riders of bicycles and E-Bikes - because of their manifest similarities - than between motorized FS users (i.e. motorcycles, OHVs) and riders of

E-Bikes and/or standard bikes. For example, you might see uphill speed differentials between an E-Bike and a bicycle of, maybe, 3-4 mph and, depending on the specific riders, it could well be that the standard bike is the faster one. The same speed differential between a motorcycle and E-Bike/bicycle could well exceed 20 mph, which is more often the case than not.