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Comments: Thank you for the opportunity for the public to engage on FSM 7700 and 7710, which would revise Forest Service directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System lands. While e-bikes do provide some exciting opportunities (such as for disabled riders), they also risk fundamentally changing the nature of mountain biking as a non-motorized, human powered sport. Allowing e-bike access to non-motorized trails, or re-designating non-motorized trails to allow any class of e-bike presents a unnecessary risk in the already delicate management of trails. Even a Class 1 E-bike provides a huge advantage for a unfit, unskilled rider over a fit and skilled rider. As electronic motors and battery technology advances, e-bikes will continue to expand their range, speed, and power. It is not unrealistic to say that in 20 years, e-bikes that may "look" like mountain bikes will be more comparable to current motorbikes that are properly only allowed on motorized trails. The increased range and speed, in particular in the context of riders who would otherwise lack the fitness and experience to obtain that range and speed under their own power, creates a host of problems: what happens when a battery dies and leaves a unfit rider out of reach of their vehicle or help, or when electronic assistance allows an unskilled rider to access the top of a challenging descent by motoring up a climb that would normally serve to filter out unskilled riders?

The fundamental push behind e-bikes is to make mountain biking easier. Mountain biking is- and should be- challenging. While many proponents will talk about how e-bikes provide access to those who would otherwise be deprived, the truth is that most \$5000+ e-bikes seen on mountain bike trails are being driven by individuals who have no need to assistance, but want to be able to go further and faster than they would be able to without the requisite suffering. Programs that allow for Class 1 e-bike access on designated trails for persons with a documented disability or handicap could provide access for those truly in need without jeopardizing non-motorized trail access for the rest of the mountain bike community.

Ultimately, e-bikes are no different than other motorized vehicles that have existed with non-motorized vehicles for decades. They are motorized vehicles, and should be separately classified from mountain bikes and allowed to access the many trails that already provide for motorized vehicles. There is no need to expand the definition of mountain biking- which has always been human powered- to include motorized bikes.