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Title: MTB Advocacy Comm. Chair

Comments: The Verde Valley Cyclists Coalition represents nearly 300 cyclists in north-central Arizona. Many of us ride mountain bikes on the Coconino and Prescott National Forests. We offer the following comments and recommendations under the public comment period that started September 24th, FSM 77000 & 7710 E-bikes #ORMS-2619:

- 1.VVCC supports the classification of e-bikes as motorized vehicles and the three classes of e-bikes.
- 2.VVCC supports the addition of "Trails Open to E-Bikes Only" as one of eight motor vehicle categories for identifying designated roads, trails, and areas on a motor vehicle use map (MVUM); and for designating roads, trails, and areas for over-snow vehicle (OSV) on an OSV use map (OSVUM).
- 3.VVCC generally supports e-bike usage on trails shared with non-motorized bicycles, pedestrians and equestrians, but limited to Class 1 e-bikes only, with the limitations described in #5, below. Class 2 e-bikes use a throttle and don't require pedal assistance. Class 3 e-bikes allow higher speeds. Both these types of bikes will encourage higher speeds and increase the likelihood of trail damage and conflicts with other users.
- 4.VVCC supports reclassification of these trails as "Trails Open to E-Bikes Only", with the limitations described in #5, below.
- 5.VVCC supports retaining at the local level land management, decisions on which trails are to be opened to e-bikes.
  - a.Require an authorized local officer of the NFS to issue a land-use planning or implementation-level decision allowing e-bike use. Decision should be made by staff who know the local trail conditions and usage patterns.
  - b.VVCC strongly promotes transparency with regard to decisions on where to allow e-bikes. This process should be transparent to the public, allow for public comment, and be compliant with the NEPA process.
- 6.VVCC strongly encourages the NFS to address the logistics of enforcing user compliance and public education with regard to e-bike Class 1 usage and restrictions.