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Comments: Thank you for the opportunity to comment on proposed rule changes that would update FSM 7700 and 7710 to clarify process and include definitions for E bikes. This is a significant new development when considering the potential effects of an emerging recreation use on National Forests, and must be carefully addressed in policy and in action. I worked for nearly 4 decades as a wilderness and recreation manager for the FS in Montana, and have extensive first hand knowledge about the travel management process, having been one of the principle authors of the Gallatin NF travel management plan.

It is important to regularly update the manual to include definitions for these and all emerging vehicle types. It is appropriate to include E bikes in the motor vehicle class. Because very few National Forests considered bicycles at all during their travel management processes, it is critical that this new class of users be evaluated under NEPA, and formal publicly driven processes that would revise existing travel management plans, or alternatively be included clearly in new plans. Blanket or programmatic allowance of E Bikes (regardless of class) on trails that are currently open to bicycles IS NOT appropriate, and would significantly change the effects analysis done during initial travel management NEPA. Allowing E bikes to use currently open motorized routes would likely be akin to those effects disclosed during original travel management NEPA. If a forest is considering allowing any proposed class of E bike to use currently non-motorized trails or routes, a public NEPA process must be conducted to revise the travel management decision. Since E bikes are appropriately considered motor vehicles in this proposed change, allowing them for example in critical grizzly bear habitat could have significant effects to open motorized route density, and therefore have potential to harm a threatened species. E bikes, as a motor vehicle MUST be restricted to designated routes.

I am concerned that the Travel Management Handbook wasn't also updated concurrently to include much more specific guidance about the process by which a Forest considers E bike use on anything other than currently open motorized routes.

Based on your proposed definitions, E bikes are motor vehicles (as they should be). Therefore, guidance for completing travel management analysis should state that these vehicles are not appropriate on non - motorized trails, especially where the ROS class allocation is Semi Primitive Non Motorized. I think as written, no E bikes should ever be considered appropriate on a trail managed more on the primitive end of the spectrum, even if the existing travel management plan currently allows bicycles. There needs to be a more thorough discussion about E bikes and appropriate uses based on ROS allocations, and TMOs of the routes. The emergence of this vehicle type begs that the Agency mandate that Forests update their travel management plans to be explicit about bicycles, and E bikes, and in the case of the later, restrict them to designated motorized routes, or areas of low controversy about mixed motorized and non-motorized use. Clearly, allowing E bikes of any class would change the status of a designated non-motorized route, and must only be done with full public involvement and appropriate NEPA to revise a travel management plan. When implementing this change, a clear public display of the change on maps will be critical. Currently, bicycles have been restricted by subpart b special order, and the information about permitted routes is usually buried on a Forest's website under special restrictions. The MVUM vehicle, and Forest Visitor Maps needs to be updated to include E bikes at the same time this new rule is being considered. This may create a conflict with the existing travel management rule which won't easily be solved without new rule making. Without good accessible free information about permitted routes and appropriate vehicle types, there's little hope for voluntary compliance. The Agency's ability to field enough Officers and Rangers to ensure compliance is severely limited. The emergence of this use is akin to a regulatory shift not unlike when the travel management rule first was instituted and without robust Agency education, maps, tools for the user, won't be easily implemented, and will largely be unenforceable.

E bikes will have more far reaching effects on wilderness trespass, opportunities for more primitive recreation experiences and solitude, conflicts with wildlife and recreation use patterns than bicycles have had in the past. The Agency needs to get ahead of this burgeoning recreation use, and mandate it be addressed through a thorough and transparent travel management process and NEPA analysis. Both E bikes and bicycles should be

restricted to designated routes on most Forests. Many many user created trails have been developed in the last decade by bicyclists that are having significant effects on natural resources. The time to really address this issue was yesterday. Thank you.