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Comments: I am commenting on behalf of Adventure Cycling Association, a national nonprofit organization with over 50,000 members that inspires, empowers and connects people to bicycle travel.

The Forest Service's proposed revisions to directives regarding management of electric bicycle use on National Forest System lands (FSM 7700 and 7710 E-bikes #ORMS-2619) still define electric bicycles (e-bikes) as "motorized vehicles." We ask that e-bikes be removed from this definition for several reasons:

1. To maintain consistency with other federal and state statutes, which define e-bikes as bicycles and exclude them from motor vehicle classifications. Lack of consistency has led to confusion among public lands users and land managers about what is permitted and where, and modernizing the outdated definition of e-bikes would help resolve these issues.
2. E-bikes are ridden and should be managed like traditional bicycles rather than motor vehicles. E-bikes are rapidly growing in popularity as a recreation option, offering accessibility to the outdoors for greater demographics of people, particularly those with disabilities or other health limitations that restrict them from pedaling a bike without assistance.
3. With growing demand for e-bike facilities, classifying them as "motorized vehicles" could result in several non-motorized trails, paths or roads being converted to motorized in order to allow the use of e-bikes. Given that e-bikes require the user to pedal in order to move forward (except for class 2 e-bikes), they are quiet, have no emissions, and can go no faster than 20 mph (except 28 mph for class 3 e-bikes), their presence and impact on non-motorized trails is more similar to traditional bikes than motorized recreational vehicles like motor bikes or ATVs. The Forest Service should not risk the unintended consequence of re-designating non-motorized trails by including e-bikes in the same definition as motor bikes and ATVs.

Adventure Cycling supports:

- Defining and recognizing the three classes of electric bicycles.
- Creating a new type of non-motorized trail designation for e-bikes to be considered by land managers.
- Allowing land managers the ability to open non-motorized trails to specific classes of e-bikes, adding specific criteria to guide land managers in making e-bike use decisions.
- Adding a new section to the "policy" considerations that guide travel management decision-making devoted to considering emerging technologies like e-bikes.
- Requiring a seat or saddle to avoid confusion with scooters and broadening the definition of e-bikes to include three wheeled devices.
- Applying the rules for traditional bicycles to electric bicycles when they are being ridden.
- Clarifying how the directive would be implemented and what NEPA review will be needed to change a trail designation.

Thank you for your consideration of our comments, and please contact us if you have any questions.