Data Submitted (UTC 11): 10/27/2020 3:53:34 AM

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Title:

Comments: I am writing in regards to 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).

I respectfully ask that electric bicycles be removed from the definition of a "motor vehicle."

Clear electric bicycle policies and rules will facilitate management, give more Americans opportunities to explore our public lands, and provide common sense solutions for pressing issues such as traffic congestion, parking, maintenance and emissions reduction. Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments. These changes are a step in the right direction toward resolving that confusion, and it's necessary to properly define the three classes of electric bicycles consistently. Modernizing the definition of electric bicycles so that they may be used much like regular bicycles will encourage the safe use of electric bicycles and ensure more sensible access. This is an excellent first step and one I heartily support.

However, these proposed changes could result in a substantial number of non-motorized trails, paths, or roads being converted to motorized in order to allow electric bicycles - an unintended consequence and management strategy for the vast network of non-motorized Forest Service areas. Due to the risks associated with redesignating our non-motorized facilities as motorized, I do not support the proposed revised directives as written. Instead, electric bicycles should be removed from the definition of "motor vehicle" and considered a non-motorized use. This is particularly true for Class 1 (pedal assist) E bikes. Without a throttle, a rider must pedal, like every other bike, to go. Additionally, Class 1 Ebikes have 20mph governor on the assist mode so that speed is kept safe, much the same speed as what non-pedal assist bikes typically operate at. Class 1 Ebikes should certainly not be considered "motor vehicles"

Electric bicycles are ridden, and should be managed, like traditional bicycles rather than motor vehicles. E-bike riders are similar to that of regular bike riders, and in most state and federal statutes, electric bicycles are defined as bicycles, excluded from motor vehicle classifications, and generally allowed on non-motorized trails. This is the right direction to head to complement the first step above of differentiating between the differing Classes of Ebikes. The Forest Service would be an outlier to manage Ebikes as motor vehicles and create more confusion amongst in the bike riding community.

Thank you for the consideration of my input.