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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 Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments.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.

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 re-designating 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.

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.

E-bikes are treated as bicycles in Europe and have caused no problems.

E-bikes have allowed me and my wife to ride on trails that we can no longer ride a traditional bike on due to the loss of lung capacity we suffered from COVID-19.

E-bikes are allowed on many state and county trails and it has caused no problems while allowing older and less able people to enjoy the trails. My house is surrounded by national forest lands that I cannot ride on because of the USFS restrictions on e-bikes. I have tried riding on motorized trails and been nearly killed. Those trails are deeply rutted and pulverized and simply not rideable by any bicycle or e-bike. I have suffered far worse crashes and injuries trying to ride my e-bike through these sand traps than anywhere else.

Moreover, motorcycles and ATVs drive at much faster speeds than e-bikes. E-bikes and traditional bikes ride at approximately the same speeds. I've been passed many times by non-electric mountain bikes but have rarely passed them. Going downhill, I ride no faster on my e-bike than on my traditional bike because YOU DON'T USE THE POWER GOING DOWNHILL. The e-bike just allows me to get up long hills that I couldn't get up otherwise without walking.

A class 1 e-bike can only do 20 mph on a flat, paved surface, not an unpaved trail. The max speed of an e-bike on a mountain bike trail is the same as a mountain bike. The speed is determined by the difficulty of the trail and the skill and fitness of the rider. I never go more than 11 mph on an unpaved trail and generally average about 7

mph. With a traditional bike I would have to walk most of the trails in my area.