Data Submitted (UTC 11): 10/22/2020 10:42:55 PM First name: Susie Last name: Murphy Organization: san diego mountain biking association Title: Executive Director Comments: Thank you for the opportunity to comment on FSM 7700 and 7710, which would revise Forest Service directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System lands.

The mountain bike community is responsible for a large part of the natural surface trail infrastructure that exists today on our federal, state and local public lands. The San Diego Mountain Biking Association works very closely with the staff of the Cleveland National Forest on trail projects and has done so for over 20 years. We work with many different land managers on trail development, trail maintenance, and trail education for all users. Much of this work relies on funding sources specific to non-motorized trail projects.

The proposed directives could jeopardize this funding and increase user conflict if non-motorized trails were to become reclassified as motorized to allow for eMTBs. Instead, the final directive must reconsider how to allow class 1 eMTBs on select non-motorized trails while retaining a trail's non-motorized status, similar to the recent Department of Interior final rule. The final directive can be further improved by managing the three classes of e-bikes separately from one another, and prohibiting class 2 and class 3 eMTBs on natural surface, non-motorized trails.

Mountain bikers appreciate the leap in technology presented by eMTBs is a unique management challenge. These proposed directives rightfully plan separate management for bicycles and electric bicycles. It is critical that land managers and local mountain bikers work together to determine where eMTBs are and are not appropriate on current and future mountain bike trails.

Thank you for your willingness to engage with the mountain bike community.

Sincerely, Susie Murphy