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Comments: Thank you for the opportunity for the public to engage 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. Hundreds of organized mountain bike clubs around the country manage thousands of volunteers who work closely with 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 following the International Mountain Bicycling Association's management recommendations: 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. This is justified by the fact that Class 2 and 3 eMTBs have significantly higher power, larger motors, much higher mass and therefore larger and different impact on the natural environment.

Mountain bikers appreciate the leap in technology presented by eMTBs is a unique management challenge. However, the user groups should be classified, grouped, and managed by the level of impact they have on the natural resources. Class 1 eMTBs and their impact are much more similar to traditional MTB and hikers than they are to class 2 and class 3 eMTBs, and should be managed accordingly. 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 the willingness to engage with the mountain bike community.

Sincerely,

K Holback, Reno, NV