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Comments: I appreciate the opportunity to provide input on FSM 7700 and 7710. I am a physician and currently the chair of the local mountain bike club, which is a chapter of IMBA. The proposed directives need to distinguish between different classes of e-bikes and maintain the trails as non-motorized.

Locally, we have seen e-bikes allow users that would not otherwise get out to bike (such as those with certain medical conditions or physical exertion limitations) are able to enjoy the local trails. A class 1 bike meets those goals. More power can lead to trail damage and personal injury, so class 2 and 3 eMTBs should have different rules for single track trails versus gravel roads.

Additionally I have concerns in reclassifying trails as motorized. A pedal assist bike is much different than a motorized bike. This will result in future user conflicts and injuries.

I agree with IMBA's position: "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."

Thank you for your time and work on this issue.

Sincerely,

Philip