

Data Submitted (UTC 11): 10/23/2020 3:06:21 PM

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Comments: Thank you for the opportunity to engage on FMS 7700 and 7710, which would clarify Forest Service directives and guidance on electric bicycle use on National Forest Systems land.

It is important to recognize that all eMTBs are motorized: directives and guidance that are already used for motorized travel are more appropriate for their governance than trying to include the vehicles with those modes of travel that exclusively a non-living power source.

Including any eMTB's in policy that would normally guide mountain bike access further jeopardizes and confuses what is a very simple separation of motorized and non-motorized users. This should be an easy, clear distinction. It also confuses continued efforts to overturn the inappropriate ban on bicycles in wilderness areas.

Please ignore the IMBA's proposed policy position: it is poor policy that ignores basic realities. All eMTBs are motorized vehicles, none are bicycles. To arrive to any other conclusion would be arbitrary and capricious, exposing the agency to legal action.

Thank you for your consideration in this matter.