Data Submitted (UTC 11): 10/23/2020 3:56:03 PM First name: Bill Last name: Miller Organization: Title: Comments: Thank you for the opportunity for the public to engage on FSM 7700 and 7710, The revision of FS directives for e-bikes is timely and will help define proper usage.

The evolution of e-bikes is finally at a point where meaningful distinctions between type and function can be drawn for the purposes of defining reasonable usage.

As you know, 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 (including myself) 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.

I think IMBA has done a good job of defining default classifications of the three classes of e-bikes. class 1 eMTB's are e-bikes and should have access to non-motorized trails (subject to local decision making/considerations of course), Class 2 and Class 2 are electric motorcycles and should be relegated to motorized trails. IMBA has done a good job of clarifying this.

Thank you for listening/considering this approach. Sincerely - Bill Miller - Woodside, CA 650 646 1550/bmiller@makenacap.com