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Title:

Comments: I've been riding my 250 watt/20 mph limited class 1 ebike on state and county trails in Colorado under their state ebike law for about 15 months. I also ride a regular unpowered mountain bike on similar trails. I believe trail erosion is actually less on my class 1 than on my unpowered bike, because I have to stand and push hard to climb steep hills on my unpowered bike, but with the ebike the computer responds quickly in real time, adding varying torque based on my torque inputs to the pedals. This results in a more consistent torque applied to the back wheel when I'm climbing, and the wheel slips less, and is therefore less likely to dislodge rocks and soil so erosion is reduced compared to my unpowered bike. I have observed this many times.

Also be aware it is impossible to spin the back wheel of a class 1 ebike on a climb as on a gasoline powered dirt bike, because there is no throttle so the speed of the back wheel is always locked to your pedal speed. It can't spin any faster than you can pedal.

No one actually cruises steep trails all day at 20 mph on an ebike. My average speed is more like 8-9 mph. I actually exceed 20 mph on my regular mountain bike often on downhills. Downhill speeds are about the same for the ebike and the regular mountain bike. My maximum speed on downhill single track trails is about 24 mph with either bike, so the motor is shut off on the ebike on descents and it rides like a regular bike.

So I disagree with the USFS proposed plan to designate "ebike only" trails. Based on my carefully measured GPS data, class 1 ebikes travel at only about 2 mph higher average moving speed on steep single track trails and are actually less likely to cause trail erosion than regular unpowered bikes. I know from experience many USFS trails are simply too steep and rocky to pedal with my regular unpowered mountain bike. I have to dismount and push often. I'm almost always the only rider attempting to ride steep unimproved USFS trails on my unpowered mountain bike, outside of Happy Jack. Opening USFS existing mountain bike trails to class 1 ebikes would allow access that simply isn't practical now, especially for older riders.

Please consider at least allowing an exception for older riders or people with health conditions who are not able to climb typical steep USFS single track trails on a regular unpowered bike. I don't believe trail erosion is a real issue, but that would keep the numbers of ebike riders small.

Finally, please note federal Public Law 107-319 (Dec. 4, 2002) designates "low-speed electric bicycles", defined as "a two- or three-wheeled vehicle with fully operable pedals and an electric motor of less than 750 watts (1 h.p.), whose maximum speed on a paved level surface, when powered solely by such a motor while ridden by an operator who weighs 170 pounds, is less than 20 mph." (i.e. class 1 and 2 ebikes) as explicitly NOT motor vehicles, so the current USFS TMR interpretation for ebikes contradicts long standing federal law.

Thank you for your consideration.