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Comments: Dear U.S. Forest Service,

Thank you for letting us to express our thoughts. I am genuinely pleased and beyond happy to hear that Forest Service displays interest in terms of increasing recreational opportunities and decreases the regulatory burden of ebikes. I am writing this letter in Support to the proposed revision that expressly exempts all e-bikes from the definition of motor vehicles.

In the following letter I will be referring specifically to Class 1, non-throttled eBikes.

eMountain Bikes are well received in Europe and elsewhere, however when they first came to the United States there was not a lot of education done with the Federal Agencies and general public on what an eMountain Bike is. The misconception with those who oppose Class 1 eMountain Bikes is predominantly found in their lack of understanding of the pedal assist technology. Uneducated people think eMountain Bikes are motorcycles of some sort. Because they are equipped with a pedal assist mid-drive motor, people cling to the word MOTOR and out of fear of the unknown toss these bicycles in with ATV's, dirt bikes, and other high powered, high torque and loud machines. This is not true, for the very following reason:

An eMountain Bicycle is similar to a traditional bicycle, which is equipped with an "assist" that comes exclusively via pedaling. The pedal assist works through torque sensing which only comes in play when the rider is pedaling. The amount of boost that the assist is capable of is proportional to the torque provided by the rider. Your input is required! They DO NOT feature a throttle which means they are unable to self-propel, therefore do NOT fall under the "Motor vehicles" classification described on the "Travel Management Rule" document. Currently, all eMountain Bicycles manufactured or imported in the United States fall under one category: "Pedelects". They ride, handle, pedal, and act like traditional mountain bikes with little to no difference. Pedelects are legally classed as bicycles rather than low-powered motorcycles or mopeds. They are not faster than traditional mountain bikes as many illogically promote and moreover they are NOT even close to the motorized devices that Forest Service has them currently categorized as.

Misconceptions like this were passed around way to long and unfortunately it is the stinkers who are making the most noise. Their complaints are unfounded. Their opinions and claims that eMountain Bike riders are hooligans with no interest in anything other than vulgar display of power without any oversight, are simply being fortified and massaged to serve their agenda, which is to keep the trails to themselves. Trail access advocacy should be greater, not more restrictive. It is such a shame that opposition from this loud narrow-minded minority influences laws and regulations. Laws and regulations need to be based on facts, not opinions. Folks that are opposition by making up a false narrative should not influence the Department of the Agriculture into satisfying their ignorance. The quieter we are on these types of subjects the more open to interpretation others become. It creates an informational vacuum and when there's a vacuum, someone is going to fill it with whatever they see fit! This is also what happens today with mountain bikers and eMountain bikes and why we still have a group of people who are vehemently against this beautiful conveyance. It's largely based on the prejudice that anyone with pedal assist is cheating. Cheating at what? Cheating at having fun? Are we competing? This argument is silly and irrational. With the help of the assist my favorite rides are becoming significantly less stressing and the climbs are not taking the fun out of the greatest reward of what mountain biking has to offer.

-They're motorcycles, they're evil, they go too fast, they'll ruin the trails! NONE of this is true! Most trail erosion is caused by riders overusing their brakes on downhill sections, either due to excessive speed before turns and obstacles or by riders riding in inappropriate, muddy conditions. eMountain Bikes and traditional bikes have identical impacts on trails in this regard, given that both use identical resources such as gravity, brakes and one contact point on each tire tread. Literally, identical! In every shape and form. Rider attitude is the key factor in trail wear, not rider's conveyance.

In conclusion: The trail systems are there for people to enjoy and eMountain Bikes simply allow a greater user experience. eMountain Bikes should not be treated any differently since they are in fact BICYCLES. They are a reasonable upgrade of a traditional bike with no greater impacts on the environment and trails. Their power assist

is no more than a bike rider with super strong legs. Beyond the significant health benefits of the activity itself, it's also an elevated adventure that drives you happily insane! Restricting access to eMountain Bikes on trails is extremely disappointing if not discriminatory. And we all know, discriminating against a minority is not a quality to be proud with today.

Thank you for your time,

Sincerely,

-Vadim