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Organization:

Title:

Comments: First, you have three groups riding ebikes. And 2 types of ebikes

Rider Groups

- A. Bikers with limitations who cannot ride a bike without assistance.
- B. Bikers who cannot pedal at all and ride three wheel ebikes. (These cannot fit safely on some trails due to width, or rocks, jumps, etc.. Due to inability to pedal, I will nit include them in comments below)
- C. Standard bikers who can ride without assistance and wants to go farther/longer and/or excels at downhill biking.

Ebike Types ( Based on Major brands, lesser brands may break the limitations)

A. Ebikes with Hub Drive Motor intended mostly for road, gravel, sand, and snow riding, many can be ridden on easy trails, some are actual mountain bikes.

They need more wattage to power bike than mid-drive motors , 750w limit, might have throttle, has 20mph limit. THE "LESS THAN 750 WATT" RULE MEANS YOU ARE ELIMINATING MOST OF THESE PERFECTLY ACCEPTABLE EBIKES. (Why is there an issue with wattage if speed limit is 20mpg? A lower wattage hub drive cannot make it steep hills and is a real problem for Group A riders. Throttles can be helpful at times, but I understand the "no throttle" on trails, on roads it is moot point and very helpful crossing roads.)

B. Mountain Ebikes MTeB with Mid-Drive Motor intended trails. (More powerful than hub drive, typically 250-350watt, (manufacturers seem to be increasing wattage more each year). May not allow all Group A to go up steep hills. (I cannot go up hills with my 250watt turbo MTeB. )

Group A needs a bike powerful enough to assist them up the hills. In my experience, there is a huge difference in power (and price) in a hub drive ebike (less expensive), and a mid drive (less powerful but more expensive). For instance, I am 72, have severe arthritis in right knee, riding an PAS ebike helps me tremendously. I have two ebikes, one powerful hub drive bought because I live in won't an area with very lots of very steep hills. It can get me up every hill around here without fear it will stop working and possibly cause a fall. It also gets up speed quickly to be safer on roads. (I cannot ride it on trails due to it not being within current limitations).

I bought a mountain ebike for trails, 250 watt turbo mid drive) But I've had to stop riding most mountain trails due to several crashes (Although more powerful than a 250watt hub drive, it cannot get me up the hills even though I have strong calves and thighs now from riding commuter ebike.)

Strongly object to the "less than 750watt" rule. 750watt on hub drive is not a powerful ebike.

Thank you for reading my notes, didn't find the 7715/7716 laws so cannot comment in these at this time.

As a side note, my commuter bike cost \$1700, my MTeB used was \$4,000, sells for \$8,000-9,000 new.