Data Submitted (UTC 11): 10/9/2020 6:54:45 PM First name: Donald Last name: Felipe Organization:

Title:

Comments: Thank you for this opportunity to provide comment on these policies. I strongly support policies allowing Class-1 E-bikes on all trails and roads open to regular bicycles-treating Class-1 E-bikes as equivalent to regular bicycles from a regulatory point of view. There is no evidence that Class-1 E-bikes, even in their current forms (these bikes are changing year by year), pose any more of an environmental risk to trails and fire roads in comparison to regular bikes; riding downhill E-bikes and regular bikes handle in ways similar or the same as regular bikes--in fact regular bikes, ridden by skilled riders, are more likely to go faster because, for now at least, they are lighter and more maneuverable; on flat surfaces a fit rider on a regular bike can attain speeds equal to or more than an e-bike; speeding and unsafe riding on trails and roads is an issue of rider responsibility, for both regular bikes and e-bikes, and should not be used to discriminate against responsible riders, some of whom are older, like myself, and require Class-1 ebikes to access some trails---especially those which involve heavy elevation gains. Climbing is the only phase of riding that is entirely and utterly different--and in this phase of riding a Class-1 E-bike requires pedalling; the bike is actually easier to control while climbing. The primary benefit of the ability to climb is ACCESS--that is, it enables riders who would be unable to climb the opportunity to access and enjoy areas where currently only younger, more fit riders are able. Given the very similar riding experiences of Class-1 bikes and regular bikes, and the lack of any reasonable justification for prohibiting them, I would argue that discrimination, intentional or unintentional, attaches to all policies that restrict access to older or disabled riders through a prohibition of Class-1 E-bikes.

Finally, the technology of e-bikes is changing rapidly. There are already lightweight 350W bikes that ride almost exactly the same as a regular bicycle (except for climbs), and could not be distinguished as an E-bike by someone who was not familiar with the difference (this is also already true for many 700W bikes). These 350W bikes, although a little heavier, can be ridden without support if need be. In the future the differences between regular bicycles and what we currently classify as Class-1 e-bikes will become more and more dubious--and there are some in Europe, which is far more advanced in attitudes and policies regarding e-bikes, who predict e-bikes will become the norm in cycling--why buy a regular bike without electric support if the bikes are appreciably the same? These technological developments only reenforce the point: Class-1 E-bikes are pretty much like regular bikes--except, one can climb, save energy, not pedal as hard-and this improves access and rider experience. To prohibit Class-1 E-bikes on trails where regular bikes are allowed, given the facts about these bikes, is discriminatory against riders who need these bikes to access trails, and will become more transparently incoherent as distinctions between Class-1 e-bikes and regular bikes fade and become more and more obscure.