

Data Submitted (UTC 11): 10/15/2020 5:50:06 PM

First name: Bradley

Last name: Haack

Organization:

Title:

Comments: I generally support the Forest Service's proposed revisions to directives regarding management of electric bicycle use on National Forest System lands (FSM 7700 and 7710 E-bikes #ORMS-2619). However, I don't think it goes far enough toward encouraging and allowing e-bikes.

I respectfully request one modification to the proposed changes -- that electric bicycles be removed from the definition of "motor vehicle" and considered to be a non-motorized use. FSM 7700 defines a Motor Vehicle as "Any vehicle which is self-propelled". Pedal assist e-bikes are not self-propelled and therefore should not be classified as motor vehicles. Electric bicycles are ridden, and should be managed, like traditional bicycles rather than motor vehicles. As an e-bike rider, my desired experience is also identical to that of a regular bike rider and I seek the opportunity to ride my e-bike on the types of trails, roads, and paths that are designated as non-motorized. These areas should continue to be designated as non-motorized and land managers should have the discretion to permit e-bike use. This would align Forest Service policy with other U.S. laws. The Department of the Interior and 28 states (and counting) define electric bicycles as bicycles, exclude them from the motor vehicle classification, and generally allow their use on non-motorized trails.

The rules segregating motorized and nonmotorized were made decades ago when pedal assist e-bikes did not exist. An e-bike does not impact the trail any more than a regular mountain bike. If you compare me (65 yr old) on an ebike with a young, fit, 20 lb heavier rider, the power and weight would be very similar. It seems like the anti e-bike arguments are based on semantics (it has a motor), and elitist righteousness (only the fit are allowed), and not based on reasonable arguments.

I ride downhill on my e-bike at the same speed that I do on my regular bike. I ride uphill on the e-bike at the same speed (or slower), as a younger rider. I'm an aging mountain biker and I merely want to ride an e-bike in order do some of the long rides that I used to be able to do when I was younger.

There are many rides that strong riders do as a loop from town. I used to be one of those riders, but now, at 65, I'm like most riders and will drive to a trailhead or arrange a shuttle. An e-bike will make those shuttle rides reasonable for an average rider thereby reducing the number of cars on the roads and at the trailheads.

Most dirt bike trails are too steep and loose for regular mtn bikes or e-bikes. E-bikes do not have the power needed to climb these trails, they just have a mild pedal assist.

An e-bike is not a motor vehicle by Colorado law. Federal Public Law 107-319 states that they are not considered a motor vehicle.

e-bike, dirt bike comparison

power: e-bike: <1 hp. dirt bike: 20-50+ hp (no limit);

weight: e-bike: 50 lbs. dirt bike: 250-300 lb;

noise: e-bike:almost nothing. dirt bike: 94+ db?