

Data Submitted (UTC 11): 10/16/2020 6:49:56 PM

First name: Andy

Last name: Francke

Organization:

Title:

Comments: I wrote my initial comments before reviewing the feedback others sent previously, so I'd like to add a few things - thank you for considering.

I fully agree with Bradley Haack, who wrote, proposing that electric bicycles (class 1 & 3) fall under the definition of regular bicycles, and not treated in the regulations as motorized vehicles:

"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."

Others wrote to oppose ebikes altogether on the basis of rude behavior from riders, and/or inability to share the trail due to weight. Neither of these is a compelling reason to ban ebikes where bikes are otherwise allowed. Rude behavior doesn't come from a motor assist.

Still others wrote to assert that ebikes should be allowed, but only on paved trails, fire roads, and so on. Of all the places I would think we'd be worried about ebikes due to speed, it would be those trails. It's the singletracks and other narrower trails that keep speeds in check, ironically. Mixed use trails where there is a chance of high speeds on bikes (of any kind) should have posted speed limits, but not a ban.

The most sympathetic argument I could imagine is that formerly quiet spaces would be dominated by the noise of ebiking activity. First, we should be so lucky that enough people get outside and enjoy the trails that this could ever be a problem. Today the more wilderness-oriented trails are very sparsely used compared to suburban parklands, etc. Noise regulations could take care of that - and I'd be in favor of pushing for those (though to be honest, I have never heard a noisy ebike yet - mine makes a mild whirring sound audible to me and the riders immediately in front and behind me when I'm pedaling - it is not audible at a distance).