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First name: Patrick

Last name: Brooks

Organization:

Title:

Comments: To whom it may concern,

I have worked in a bike shop for 15 years, and we have sold E-bikes for 10 of them. I was once in favor of E-bikes and felt they provided greater access. This is no longer my point of view.

The market is now flooded with super cheap electric motorcycle masquerading as a bicycle. These bike ship straight from china and have a throttle that does not require you to peddle. I now see twice as many of these bikes and I do anything that would be considered "pedal assist". The three tiered system would require education of each and every officer in the forest service as to the brands that ship these bicycle shaped motorcycles straight from china and a level of interventional enforcement that is quite simply impractical. To allow these bikes to make there way into the not motorized areas would open a Pandora's box of unrestrictable quiet motorcycles that not only brake the intended laws suggested in this proposed directive.

It is also my observation that the speed of these bikes combined with the athletic demographic leads to an injury rate that far exceeds that of the average cyclist. This issue has been documented to the extent that Liberty Mutual, the primary insurance provider for bike shops, will be denying coverage to any bike shops that rent E-bikes or sell a high percentage of E-bikes. The problem became so evident this summer that I began to refuse test rides to people because around half of the people who came seeking E-bikes were barely able to mount them and and were so unstable trying to ride these 20 mile an hour machines that the potential litigation wasn't worth the risk of a potential sale.

Allowing these electric motorcycles in non-motorized areas is in my opinion a violation of the belief of "Fair Chase". As a former hunters safety instructor, I'm disgusted by the number of so called "Sportsmen" who are trying to lazy their way to a harvest with no respect for the animals they are pursuing. These areas were made non-motorized for a more than one reason of course but one of those reasons is road hunters.

It is because of these realities of the "e-bike" market that we as sportsmen cannot open these areas to unenforceable policies attempting to make uneducated officers differentiate between which E-bikes function in which way just by looking.

Thank you for your time

Patrick Brooks