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Title:

Comments: As an independent bicycle dealer in Southern Colorado I have witnessed the positive impacts ebikes have on my customer's lives. In general, the individuals purchasing e-MTB's are 50+yr old riders - these are the same people who pioneered mountain biking in the 80's and 90's. This technology allows them to continue experiencing the trails which they had the stamina and fitness to ride in their youth. I've personally witnessed the technology improve the lives of physically disabled individuals - the pedal assistance allows them to ride with the group again. Every Class 1 e-bike I've sold has had a positive impact on that customer's life and their fitness.

In regards to e-bike classification, I strongly believe the three classes of e-bikes need to be managed separately due to broad differences in performance and rider assistance.

Class 1 - These bikes should be treated no differently than traditional mountain bikes except on trails where local land managers see the need to restrict their use due to user conflict and resource damage. The rider experience and trail impact on class 1 ebikes is almost identical to a traditional mountain bike. Industry leading manufacturers are working to tune and calibrate these motors and drive systems to provide the cleanest power transfer to the wheel which maintains pedal assistance and traction on the dirt. The moment the wheel loses traction, the motor stops providing assistance and preserves the trail surface from excessive damage.

Class 2 - These bikes should be treated no differently than a motorcycle. The throttle assistance on Class 2 e-bike completely changes the user experience and trail impact compared to Class 1 e-bikes. I have personally dug a hole in the ground using the throttle assistance while holding the front brake on one of these bikes. The drive systems on Class 1 e-bikes are purely designed to provide maximum power with no consideration or safeguard for the damage the bike will do to the trail surface. I believe the throttle assistance provides too much convenience for riders and allows individuals who don't have the fitness or backcountry experience to get very deep in the woods. At least on a Class 1 e-bike when the terrain gets too nasty to pedal, the bike stops assisting and the rider must turn back - this is a good thing.

Class 3 - These bikes should be treated no different than a motorcycle. While 28mph doesn't seem like a big increase over 20mph, the 40% increase in speed is significant. It affects the handling characteristics of the bike and creates too much of a differential between normal riders and e-bike riders on the same trail. Leading bike manufacturers are building these bikes primarily with urban bike-commuting in mind - not forest trail riding. Though these bikes share similar pedal assistance characteristics to Class 1 e-bikes, they are intended to be ridden on paved roads, bike paths, and gravel roads - they are not designed for single track trail riding.

Thanks for your consideration on this topic. Class 1 e-bikes should be allowed on non-motorized forest trails similar to a traditional mountain bike. Class 2 and Class 3 e-bikes should be designated similar to a motorcycle and only allowed on roads and motorized trails.