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Comments: 36 CFR § 212.1 defines a motor vehicle as "any vehicle which is self-propelled". The common definition of self-propelled is "moving or able to move without external propulsion". Class 1 and 3 ebikes do not fit this definition and should not be classified as motor vehicles. Class 1 and 3 ebikes do not have a throttle and are propelled by external propulsion, the rider's legs. Many states have correctly classified class 1 and 3 ebikes as bicycles. These proposed directives do not align with the Forest Service's own regulations or state laws and will lead to burdensome lawsuits regarding the obvious conflicts amongst the agency's own regulations and directives.

Aligning ebikes with the travel management directives will add to a cumbersome, complicated process that will create unnecessary confusion and conflict. Any new directives concerning ebikes should be aligned with directives in the recreation management series and should align with state law and the Forest Service's own regulations, particularly the definition of motor vehicle.

Science has shown that ebikes do not create any additional impacts to trails when compared to other bicycles and other trail uses such as horses. Therefore, there should be no environmental review necessary at the agency, regional, or local level required to allow class 1 and 3 ebikes trails where other bicycles are permitted. The Forest Service should focus its efforts on managing trails, working with partners, and educating users. Spending needless time going through a process to allow ebikes on trails is a waste of precious time and resources.

The new directives should simply adopt class 1 and 3 ebikes non-motorized transportation. They are bicycles and anyone and everyone who is involved in developing these regulations should be required to ride one so that they have first-hand understanding of this new bicycle technology.