Data Submitted (UTC 11): 10/25/2020 2:23:58 PM
First name: Jerud
Last name: Crandall
Organization:
Title:
Comments: I've been a mountain biker for decades and while I'm not interested in using them myself, I have tried them out and it's clear that eBikes will be a big part of the future of the sport.

While every eBike is undeniably "motorized" the classes 1, 2, and 3 are crucial and relevant when it comes to trail use. The difference between pedal-assist (class 1 and 3) and throttle control (class 2) is tremendous, and is the fundamental distinction between an "electric bike" and an "electric dirtbike". It's clear that "dirt bikes" don't belong on trails currently only open to MTB use -- but this shouldn't mean that class 1 & 3 bikes can't use these trails. Human nature drives the industry to keep selling eBikes, and drives users to want them. They are expensive status symbols, use appealing technology, and make a grueling activity easier and more enjoyable. People aren't going to stop using them. That means that if eBikes are categorically prohibited from MTB trails, the inevitable next step will be petitioning to open up current MTB trails to motorized use -- and that will bring with it the "true" dirt bikes, side-by-sides, and other uses which do undeniably damage the trails, environment, and user experience.

The difference is the throttle. You can't do the kind of damage with pedal-assist that you can with an independent throttle. This creates a clear line between class 2 and classes 1 & 3 eBikes. Class 2 can clearly be banned, but the other two don't pose the same risk.

And when it comes to classes 1 & 3 -- for MTB use they are essentially the same, because the distinction between them is mostly top speed, and even the top speed of a class 1 eBike is preposterous for trail use. I suspect those who worry eBikes are "too fast for trails" aren't personally familiar with riding MTB. Cycling on trail "feels" fast (that's part of why it's fun) but few riders come anywhere close to even 15 mph on trail. Most barely exceed 10 mph. This isn't because of their physical fitness -- it's the trails themselves. Actually keeping a bike on the path around tight corners and obstacles is difficult at higher speeds and regardless of propulsion, the vast majority of riders simply lack the skill or strength to control a bike that well. Many trails are simply built too tightly for high speed riding at all, by a rider of any skill, and it's fair to say that eBike riders in general are not going to have advanced bike-handling skills. In other words -- it doesn't matter what the top speed of an eBike is -- the riders won't be capable of reaching it. There is therefore little to no practical difference between class 1 and class 3 eBikes on MTB trails with the exception of those areas where "trail" runs on open, flat doubletrack or similar surfaces.

Please don't lump all eBikes together when creating trail-use policy. This issue requires careful consideration of the details, and willingness to differentiate between 'shades of grey' rather than making categorical distinctions according to definitions that could not forsee current technology. The long-term effects will be harmful to the land, the users, and the goals of the Forest Service.