Data Submitted (UTC 11): 10/25/2020 2:31:46 PM First name: Andy Last name: Hovancsek Organization:

Title:

Comments: Good day, thank you for opening this up for comments. It appears that "you" are considering making eMTB'S classified as a motorized vehicle. That would be a disservice and simply inaccurate. EMTB or ebikes in general are not "motorized" vehicles in the traditional sense. Yes, you can purchase an E motorcycle but that is different than a Class 1 EMTB, which is the majority of ebikes being discussed for trail use. There is no "throttle" on a class 1 emtb and they are limited to no more than 20mph for power assistance-when you are going above that speed the assistance from the motor cuts out. Classifying emtb's as motorized vehicles puts emtb riders at risk. Imagine riding a bicycle at 12mph and a true motorized vehicle comes flying by at 45mph? This happens all the time on paved roads typically with ample space and "room" to avoid each other. Now picture that on a bike trail, 5 or 6 feed wide with trees, rocks and other significant obstacles all around you? That is dangerous for both groups/parties involved. An emtb is very similar to a bicycle, in fact there are only a few differences, a motor and a battery. Classifying them as vehicles isn't accurate, safe or the right thing to do. Would an emtb be able to ride on the Freeway? Imagine riding at 18mph down the slow lane on a major freeway? Even class 3 ebikes that are limited to 28mph are still not the same as motorized vehicles, they require the rider to pedal. Calss 2 ebikes, which do have a throttle and operate more as an electric "motorcycle" are limited to 20mph. There are simply not enough differences between bicycles and ebikes to classify them as motorized vehicles. It would be a disservice to all three user groups, bicycles, ebikes, and true motorized vehicle users. In a world of ever-growing rules and limitations this is an area where we can have a positive affect and make the better and frankly the right decisions to allow emtbs to operate in a safe space without limiting them through an in-accurate classification. I would support and think it is appropriate to consider Class 1 EMTB's the same as a traditional bicycle. If a change "needs" to be made it should not apply to Class 1 Ebikes. Thank you.