



Amateur Riders Motorcycle Association
PO Box 458
Cottage Grove, MN 55016

March 22, 2026

Rep. Tom Dippel (R) District: 41B
2nd Floor Centennial Office Building
St. Paul, MN 55155

Re: Opposition to HF 3785

Dear Rep. Dippel:

The Amateur Riders Motorcycle Association (ARMCA), also known as District 23 of the American Motorcyclist Association (AMA), has more than 4,000 members in Minnesota. The AMA has nearly 6,000 members in the state, and there are approximately 20,000 registered off-highway motorcycles (OHMs) in Minnesota.

We are writing to express our opposition to the language in HF 3785 that changes the definition of an off-highway motorcycle. Specifically, we ask that lines 2.4 through 2.30 be removed from the bill.

We understand the intent behind the language that seeks to distinguish Class 1–3 e-bicycles from vehicles commonly referred to as “e-motos,” and we support those sections of the bill.

However, there is a wide range of two-wheeled electric vehicles that could fall under the “e-moto” definition, and most of those vehicles should not be classified as OHMs. If all e-motos were classified as OHMs, it would signal to the public that these vehicles are suitable for OHM trails. In most cases, that is simply not true.

There are significant safety concerns associated with using many of these vehicles on OHM trails. Most are not designed to handle trail conditions or obstacles such as roots, rocks, and logs. They often lack the suspension needed for rugged terrain, may have slick tires rather than knobby off-road tires, and generally do not have frames built to withstand trail forces. For e-motos equipped with pedals, ground clearance is also an issue. There are several other design limitations as well.

The trails themselves are also not designed for these vehicles. OHM trail tread is typically very narrow—usually 12 to 24 inches wide—and is bordered by trees, stumps, roots, rocks, and ruts. On many e-motos, pedals place the rider’s feet lower and closer to the ground than the foot pegs on an OHM. In addition, pedals may be smooth, while OHM foot pegs are spiked to help keep a rider’s boots securely in place. OHM riders also wear specialized boots with substantial toe and ankle protection. Even with that protection, and with properly designed foot pegs, riders still sometimes have their feet knocked off by rocks or stumps,



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leading to injuries such as broken toes or feet. Allowing most e-motos on these trails would likely increase the number of crashes and injuries caused by contact with trees and other obstacles.

In addition to the increased risk of bodily injury, allowing most e-motos on OHM trails would also damage the trail system. Pedals scraping along the sides of trails would widen trail tread and alter the single-track experience. Super-elevated curves would develop different riding lines. Ground pressure on the trail tread would increase, changing compaction and tread conditions. These are only a few examples of the adverse impacts these vehicles could have on Minnesota's trail system.

We could raise many additional concerns about classifying most e-motos as OHMs, but in the interest of time, we will stop here.

The bill also removes the current exemption for mopeds, pocket bikes (smaller sport bikes), and gray motorcycles (custom-built "unique" two-wheeled machines) from the definitions of OHMs and dual-sport vehicles. Those exemptions exist for good reason, and there are several important policy considerations behind their inclusion in current law.

We believe the best solution is to create a new definition or category for these emerging vehicles—such as "e-motos." This could be added to Chapter 169.011, and we would be happy to work with you to develop language that is acceptable both to us and to the e-bicycle community.

However, we cannot support any of the proposed changes to the Chapter 84 definitions.

Thank you for your time and consideration.

Sincerely,

Tom and Karen Umphress
ARMCA/D23 Government Relations Officers