



USDA Forest Service
Director Penny Wu
1400 Independence Avenue SW
Washington, DC 20250-1124.

October 26, 2020

Re: Forest Service Manual 7700 Travel Management; Chapter 7700, Zero Code; Chapter 7710 Travel Planning

Submitted to: <https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2619>

Dear Director Wu,

Thank you for this opportunity to provide comments on proposed revisions to the Forest Service Manual (FSM) 7700 and 7710 regarding the definition of bikes, e-bikes and the designation of three classes of e-bikes. Please accept the following comments on behalf of Friends of the Inyo, a regional nonprofit conservation organization working within Region 5 and 6 on the Inyo and Humboldt Toiyabe National Forests. We also commented on the Department of Interior's rulemaking for e-bikes and have reviewed that final rule published this month. We are pleased the USDA USFS has decided to take a different approach to planning for e-bikes, and do it through the appropriate mechanism of Travel Management.

We agree with the need to clarify that e-bikes are a class of motorized vehicle subject to long-standing travel management laws and policies. We also see the opportunity for the agency to respond to the growing number of e-bike recreationists through a formal designation process that includes limiting e-bikes to particular classes that determine their appropriate use on the national trail system. The need to respond to the rapidly growing industry and technology of e-bikes is time sensitive and we are in full support of the agency's process in moving forward with revisions to the 7700 and 7710 directives.

We look forward to reviewing the final revisions to the directive when they are released and engaging in how the new directives are applied in our local area. We fully expect that the designation of trails for e-bike use will maintain the Travel Management Rule by applying the appropriate level of NEPA and application of the minimization criteria.

Sincerely,

Jora Fogg
Policy Director
Friends of the Inyo