10/26/2020

Director

Recreation Staff

United States Forest Service

Department of Agriculture

1400 Independence Avenue SW

Washington, DC 20250–1124

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

Dear Director,

Thank you for the opportunity to comment on the United States Department of Agriculture (USDA), Forest Service proposed revisions to directives to update and clarify guidance on management of electric bicycle use on National Forest System (NFS) lands.

On behalf of my business, we respectfully ask that electric bicycles be removed from the definition of a “motor vehicle.”

Clear electric bicycle policies and rules will facilitate management, give more Americans opportunities to explore our public lands, and provide common sense solutions for pressing issues such as traffic congestion, parking, maintenance and emissions reduction. Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments. These changes are a step in the right direction toward resolving that confusion, and it's necessary to properly define the three classes of electric bicycles consistently. Modernizing the definition of electric bicycles so that they may be used much like regular bicycles will encourage the safe use of electric bicycles and ensure more sensible access.

However, these proposed changes could result in a substantial number of non-motorized trails, paths, or roads being converted to motorized in order to allow electric bicycles – an unintended consequence and management strategy for the vast network of non-motorized Forest Service areas. Due to the risks associated with re-designating our non-motorized facilities as motorized, I do not support the proposed revised directives as written. Instead, electric bicycles should be removed from the definition of “motor vehicle” and considered a non-motorized use.

Electric bicycles are ridden, and should be managed, like traditional bicycles rather than motor vehicles. The desires of e-bike riders are similar to that of regular bike riders, and in most state and federal statutes, electric bicycles are defined as bicycles, excluded from motor vehicle classifications, and generally allowed on non-motorized trails.

We would also like to offer our company’s individual perspective on these proposed changes. Our company Felt Bicycles (a subsidiary of Rossignol group) feels e-bikes are a new essential on equipping people to be able to enjoy the outdoors like they have not experienced before. We are a company focused on sustainable resources along with our RESPECT program.

This change would greatly increase the amount of new rides we can get out on the trails and new riders mean more revenue in parks and surrounding communities. We have numerous customers wanting to go further and see more remote places and this new classification will allow more people to experience the beautiful forests and trails which they normally wouldn’t. The bicycles only have power when the rider pedals like a bicycle. It is not like a motorcycle or other motor vehicle where it has a throttle. This alone should warrant the re classification.

We would be happy to discuss this matter further and are available as a resource for anything needed by the agency. Thank you for your consideration of our comments.

-Ash Murrin

530-401-1909

Senior Product Development Manager