



10/25/20

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 Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments.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. We're a utility type bicycle company based in Southern California offering bikes that fold to fit in vehicles for easy travel, and many of our bikes are used in these areas by those camping and recreating in parks. Other models are designed to replace cars altogether, providing clean transportation and carrying capacity for passengers or cargo.

Access to safe places to ride and common-sense policy decisions encourage people to make choices to be better stewards of our planet and U.S. Forest Service Land.

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.

A handwritten signature in black ink, appearing to read "S. Boyd", written over a horizontal line.

Steve Boyd
President