



October 26, 2020

Director  
United States Department of Agriculture Forest Service  
Recreation Staff  
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 myself and my business, I 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 Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments.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.

For more than eight years, I have personally been involved with efforts to modernize legislation and rulemaking to promote better bicycling and specifically expand the places Americans can enjoy riding a low speed electric bicycle for the health, wellbeing and environmental benefits that they afford. Getting more Americans outdoor and active is beneficial to the growing numbers of riders that have experienced this amazing technology and the communities where they reside.

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

Kind regards,

A handwritten signature in black ink, appearing to read "Pizzi", with a stylized flourish at the end.

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