



Director  
Recreation Staff  
United States Forest Service  
Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250-1124

October 26, 2020

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.

SRAM LLC is a global manufacturer of bicycle components with US offices in California, Colorado, Illinois, Indiana, and South Dakota. We have over 3000 employees and over \$900 million in annual sales. Our products are widely available on ebikes both for pavement and dirt trails. Therefore we have an interest in better access for ebikes on federal lands and trails. We also want to protect the quality and safety of the outdoor experience for cycling with or without electric assist and for other trail users.

We respectfully ask that electric bicycles be removed from the definition of a “motor vehicle.”

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 are writing to support the comments submitted by the PeopleForBikes Coalition, which we are a member of and the International Mountain Bike Association, a group we sponsor.

Thank you for your consideration of our comments. Please contact Randy Neufeld, rneufeld@sram.com, director of the SRAM Cycling Fund, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ken Lousberg". The signature is written in a cursive, flowing style with a long, sweeping tail on the 'g'.

Ken Lousberg CEO  
SRAM LLC  
1000 W Fulton Market  
Chicago, IL 60607