

October 26, 2020

FROM: SPECIALIZED BICYCLE COMPONENTS INC
15130 Concord Circle
Morgan Hill, CA 95037

TO: 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

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 Specialized Bicycle Components, 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 Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments.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.

Specialized Bicycle Components is a USA-based company that brings to market bicycles of all kinds in addition to bicycle equipment and accessories. We employ several hundred taxpayers in all 50 states at our headquarters in California, distribution centers in Utah and Ohio, and our field workforce around the country. We have been developing bicycles for 40 years and used that expertise to develop our first pedal-assist electric bicycle in 2010. Since then, we have become the unquestioned leader in the quality USA e-bike market, with over 1/3 of the total brand share.

Our leadership extends beyond the business and into the advocacy front, where we have helped to shape the industry's efforts via PeopleForBike's E-Bike Committee, and our work across the country on electric mountain bike trail access. People who ride Specialized bicycles use their bicycles a lot, globally logging over 1 million kilometers of rides via our Mission Control app that connects to our electric bicycles. Not only do they ride a lot, but they do so safely – the power and speed data we've anonymously collected from the app led directly to the development of our latest e-mountain bike, the Levo SL, which bucks the anticipated trend and lowers the maximum and average power output of the pedal-assist motor.

As a complete bicycle brand who serves all types of riders, both analog and electric, we believe it is crucial that when welcoming eMTBs to trails, we preserve access for traditional analog bicycles as well. The Forest Service's proposed rules threaten that access as well as additional, local-level funding that may be specific to non-motorized trails. Rather than define eMTBs as motorized, we request that the same classes be defined as non-motorized vehicles, in keeping with the trend of all other federal and nearly all state agencies and legislatures.

Furthermore, we encourage all local rangers and land managers of NFS lands to provide access for class 1 electric bicycles wherever traditional, analog bicycles are allowed.

Thank you for your consideration of our comments, concerns and priorities regarding proposed the proposed revised directives. We are available to answer any questions about electric bicycles and their use on federal public lands.

Sincerely,



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