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 Forest Service policies and laws concerning electric bicycle use on public lands are outdated and are confusing for land managers, consumers, small businesses and local governments.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

REI is a specialty outdoor retailer, headquartered near Seattle with a strong believe that a life outdoors is a life well lived. As, the nation's largest consumer co-op, REI is a growing community of more than 19 million members who expect and love the best quality gear, inspiring expert classes and trips, and outstanding customer service. REI helps to connect people to the nation's public lands, including national forests, through our 167 store locations and 15,000 employees in 39 states and the District of Columbia.

The Co-op is growing its offerings of pedal-assist electric bicycles, including electric mountain bikes. Pedal-assist e-bikes create greater access to more people who want to ride but experience physical barriers. Whether it be distance, topography, physical limitation, time, or stronger riding partners, these innovations are helping people overcome challenges and ride their bike more frequently. As REI adds a wider variety of electric bicycles for customers to choose from, the Co-op will continue to focus on class-1 (up to 20 MPH pedal assist) and class-3 (up to 28 MPH pedal assist) electric bicycles.

We believe class-1 electric mountain bikes can help get more people outside to enjoy the many benefits of spending time outdoors. However, we recognize electric bicycles need to be managed in a sustainable way for both the environment and other trail users. Having clear and consistent electric bicycle policies and rules across geographics will also help provide clarity around educating customers on where they can ride their electric bicycles responsibly.

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.

Taldi Harrison
Government Affairs Manager