

OUTDOOR ALLIANCE

October 26, 2020

Director, USDA 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:

On behalf of the human powered outdoor recreation community, we write to share our perspective on the Forest Service's revised directives to facilitate access and improved management for e-bikes on Forest Service trails.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

In general, our interest is to ensure that e-bikes are harmoniously integrated with other public lands recreational uses and that e-bike use does not come at the expense of the human powered recreation experience, human powered access, or conservation values. Given that hybrid human/electric powered technology is likely to expand into other settings, we support the Forest Service in moving cautiously.

Most importantly, we strongly support the decision to require site-specific access determinations based on NEPA and robust public engagement, and we believe these attributes to be absolutely essential to balancing the public desire for e-bike access with protecting the experience of other trail users and conservation values. We believe it is appropriate that these decisions be made in the context of travel management.



OUTDOOR ALLIANCE

Outdoor Alliance also strongly supports the decision to provide management and definition for some e-bikes distinct from both traditional bicycles and from other classes of off-highway vehicles (OHVs). E-bikes are a hybrid technology, with reduced potential for user conflict and environmental impact relative to other classes of OHV, but with increased potential for conflict and environmental impact relative to traditional bicycles. It is appropriate to manage this type of use independent of both traditional bicycles and higher-impact OHVs.

Additionally, we support the decision to adopt the 3-class system employed by the Consumer Product Safety Commission and empower land managers to open trails to a specified subset of the 3 classes as dictated by physical and social conditions on the landscape.

We are concerned, however, by the potential for reclassification of trails to change the availability of funding where funds are restricted to nonmotorized trails. We encourage the Forest Service to examine this issue more closely to ensure that funding availability is not curtailed by a decision to open trails to e-bikes. Additionally, it is important that reclassification of historically nonmotorized trails to allow for e-bike use, where appropriate, not become the first step toward broader motorized use. For these reasons, we would support a cautious exploration of ways to develop a hybrid category of trail designation that maintains a clear distinction for truly nonmotorized use, but ensures that decisions to judiciously allow increased access for e-bikes (and other hybrid human/electric technologies to come) will facilitate precise management and not come with unintended social effects or funding ramifications.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance



OUTDOOR ALLIANCE

cc: Adam Cramer, Executive Director, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, Interim Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
Todd Walton, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Mitsu Iwasaki, Chief Executive Officer, American Alpine Club
Sarah Bradham, Interim Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club
Chad Nelson, Chief Executive Officer, Surfrider Foundation

