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U.S. Forest Service
Director, Recreation Staff
1400 Independence Ave SW
Washington, DC 20250-1124

October 9, 2020

Subject: Comments on proposed revisions to Forest Service Travel Management Manual 7700

Dear Ms. Wu:

I am writing on behalf of the Idaho Conservation League to comment on proposed changes to Forest Service directives related to the use of electric bikes (e-bikes) on National Forest System Lands. The Idaho Conservation League has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development.

The Idaho Conservation League generally supports the proposed changes to Forest Service directives at FSM 7700 – Travel Management. As the agency is aware, e-bikes are an emerging recreational activity. Because e-bikes have a motor, it is appropriate to classify and manage their use along with all other motorized vehicles. E-bikes can impact National Forest System resources such as soil, water, fish, and wildlife. Designation of routes for e-bike use will minimize the effects of e-bike use to the environment by ensuring that the use of e-bikes is allowed on appropriately designed and located trails.

Insufficient management of e-bike use can also create conflicts between different user groups. For example, if the Forest Service were to allow e-bike use on all non-motorized trails, then it would result in conflicts between hikers and even mountain bikers who seek purely human-powered recreational experiences. Designating specific routes or trails for e-bike use will ensure that these designations meet user expectations.

Proper implementation of these directives is critical. To the extent that the agency is contemplating the use of programmatic decisions to approve blanket e-bike use across National Forest System units, we encourage the Forest Service to reconsider. Site-specific travel management decisions are more appropriate. As stated above, decisions to designate routes or trails for e-bike use should be limited to locations where e-bike use minimizes effects to resources and conflicts between user groups, consistent with the Travel Management Rule and its intent.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Smith". The signature is written in a cursive style with a horizontal line at the end.

Brad Smith
North Idaho Director