



# Pacific Crest Trail Association

October 22, 2020

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

This letter submitted to: <https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2619>

RE: U.S. Forest Service revised travel management directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System (NFS) lands

Dear U.S. Forest Service Director of Recreation,

I am writing on behalf of the 14,700 member Pacific Crest Trail Association (PCTA). The nonprofit PCTA is the U.S. Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails is rooted in the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance," states, "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." As such, the PCTA's role is to work with the U.S. Forest Service to ensure the best possible management of the PCT and the experience it affords trail users, year-round.

We appreciate the opportunity to comment on the proposed updated travel management directives to clarify how electric bicycles (e-bikes) are managed on National Forest Service (NFS) roads and trails. The PCTA supports the use of e-bikes in appropriate places on NFS lands, and believe that motorized recreation is an important use of public lands; however, the effects of designating motorized use on non-motorized trails must be analyzed to ensure that this use will not degrade the natural, cultural, recreational, and social values for which that land and other resources are managed.

The PCTA's comments are organized to reflect each section of the Travel Management Directives that have proposed updates.

## 7702 – Objectives

The PCTA supports adding objective #8, "To consider emerging technologies (such as e-bikes) that are changing the way people access and recreate on NFS lands."

We support motorized transportation and recreation on NFS lands. It is important for the Agency to address new and increasingly popular forms of transportation and recreation. Nonetheless, it is essential that this new objective is considered in collaboration with the other seven Travel Management Objectives, including objective #3 which is, "To provide an appropriate range of recreation opportunities on NFS lands and to *minimize conflicts among uses* [emphasis added] of NFS lands." Future e-bike designations must take into consideration how new motorized use will conflict with or degrade the experiences of other recreationists such as hikers, equestrians, and mountain bikers.



### **7705 – Definitions**

The PCTA supports the definition of a “bicycle” as a, “...solely human-powered device...” We also strongly support the definition of an “electric bicycle (e-bike)” as, “...a type of motor vehicle...equipped with...an electric motor...”

To define an e-bike as anything other than a motorized vehicle would defy plain and simple fact. We commend the U.S. Forest Service for taking this straightforward approach, rather than exempting e-bikes from the definition of a motorized vehicle as a means to allow e-bikes on non-motorized trails.

### **7711.3 – MVUMs and OSVUMs**

The PCTA supports adding line “g” to section 6 to designate e-bikes as a special class of motor vehicle on the Motor Vehicle Use Maps.

### **7715.5 – Criteria**

The PCTA supports the addition of Criteria #3 to consider existing Travel Management Objectives (TMOs) before designating motor vehicle use, including e-bikes, on NFS trails. In addition to considering existing TMOs, the Recreation Opportunity Spectrum (ROS) should be considered prior to allowing e-bikes on non-motorized trails. Specifically, e-bikes, as a type of motorized use, should not be allowed on trails where the ROS designation is *Primitive* or *Semi-primitive non-motorized*.

**Criteria #4**, “Specific Criteria and Guidance for Designating E-Bike Use on Trails” needs more explicit direction in places.

#### **4. a.**

The decision to designate e-bike use on a NFS trail should start with evaluating the trail’s TMO, and to consider whether bicycle use is already allowed on that trail. If bicycle use is not allowed, then the addition of a motorized e-bike would likely not be appropriate to include on that trail. Additionally, as stated above, the ROS should also be consulted as a tool to sustainably manage motorized and non-motorized forms of recreation.

#### **4. b.**

We specifically support the direction to address, “...any site-specific considerations.” Without adequate, project-level National Environmental Policy Act (NEPA) analysis and public process, a Unit cannot accurately determine if the, “...effects from e-bike use are comparable to effects from existing bicycle use...” *If* it is determined that the effects from e-bike use on a given trail are comparable to mountain bike use through NEPA analysis, then it *may* be appropriate to allow e-bike use.

Regarding the protection of the PCT, and other trails which motorized and mechanized use is prohibited, site-specific analysis is crucial. Although the PCT is legally closed to mechanized and motorized transportation, this does not make the PCT immune to the impacts associated with mechanized and motorized vehicles in a real, on-the-ground way. Currently, the agency is not able to sufficiently enforce the prohibition of non-mechanized and motorized vehicles on the PCT, resulting in illegal bicycle and motorcycle trespass. In some areas, this problem is rampant and because of a lack of law enforcement, there is little consequence. This trespass negatively impacts the PCT experience, creates user conflicts, and poses serious safety concerns. A mountain bike rider traveling downhill at high speeds poses a serious threat to hikers, and especially horseback riders. An e-bike, like a mountain bike, is relatively quiet and can come up quickly on a hiker or horseback rider, surprise a horse and lead to an accident with potentially significant consequences. The potential hazard will increase as e-bikes travel at a high speed, not only downhill, but uphill by engaging the electric motor. This issue becomes more concerning

because many equestrians travel on the PCT so they will not have to be on-guard for an encounter with a fast-moving vehicle.

With more people reaching remote backcountry areas and trails that intersect with the PCT, illegal encroachment will likely increase, leading to a rise in conflicts and potential for serious accidents. Furthermore, additional people accessing the backcountry more quickly and easily has the potential to degrade already high-use areas. For these reasons, e-bikes, although not legally allowed on the PCT, have a real potential to impact the PCT experience and the trail's surrounding landscapes.

**4. c.**

The PCTA has concerns with the direction for Units to consider:

“Whether a programmatic environmental analysis may be feasible and more efficient due to similarities in effects of bicycle use and e-bike use.”

Without site-specific analysis, including a public process, a Unit cannot sufficiently judge whether the effects of bicycle and e-bike use will be similar regarding user conflicts and impacts on natural resources. **A programmatic environmental analysis should not be considered sufficient analysis to allow motorized use on non-motorized trails, and this language should be deleted from the final directives.**

We urge the U.S. Forest Service to require site-specific analysis *before* allowing e-bike use on mechanized, non-motorized trails. Without this level of analysis, the effects of e-bikes on non-motorized trail users and natural resources will be based on assumptions rather than rigorous analysis and consideration of local conditions.

We strongly support the last paragraph in this section, “E-bikes are not allowed on a National Scenic Trail...” Nonetheless, if this is to have a positive effect, then trails that intersect with National Scenic Trails need to be sufficiently analyzed to determine if allowing e-bikes on them will lead to increased mechanized and motorized trespass on those National Scenic Trails.

Thank you for considering our comments in response to the Proposed Updated Travel Management Directives to address the management of e-bike use on NFS lands. We commend the U.S. Forest Service for taking a straight-forward approach to defining e-bikes as motorized vehicles. Please feel free to contact me with any questions regarding the PCTA's comments.

Thank you,



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Cc: Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator