



State of Utah

GARY R. HERBERT
Governor

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*Lieutenant
Governor*

Office of the Governor
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE
Director

October 23, 2020

Submitted via electronic mail: <https://cara.ecosystem-management.org/Public/ReadingRoom?project=ORMS-2619>

Tina Johns Terrell
Associate Deputy Chief
National Forest System
1400 Independence Avenue SW
Washington DC, 20250-1124

Subject: Forest Service Manual 7700 Travel Management; Chapter 7700, Zero Code; Chapter 7710 Travel Planning—Electric Bikes

Dear Ms. Terrell:

The state of Utah (State) has reviewed the proposal to revise Forest Service directives to update and clarify guidance on management of electric bicycle (e-bike) use on the National Forest System (NFS) lands. E-bikes are increasingly being used to access and enjoy the great outdoors necessitating rules to govern their use in public areas. The State commends the Forest Service for addressing this new technology and implementing a decision-making process to allow the use of e-bikes where appropriate.

The State supports public access to public lands within the State. e-bikes can provide better access to public lands for all categories of users. One study has shown that recreationists believe e-bikes allow riders greater and deeper access to the backcountry and dirt trails.¹ The State generally supports greater access to public Lands managed by the Forest Service in Utah by means of e-bikes. This is especially true for individuals with disabilities or other physical restrictions that would otherwise not allow them access to public lands. That same study also concluded that recreationists are more accepting of e-bikes and users after riding an e-bike themselves.² This suggests that the conflicts between users of traditional bikes and e-bikes may shrink as e-bikes become more common.

¹ <https://wsd-pfb-sparkinfluence.s3.amazonaws.com/uploads/2019/08/Hall-2019-eMTB-perceptions.pdf> (last visited June 8, 2020).

² *Id*

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Moreover, no evidence exists to suggest that e-bikes have a more negative impact on the environment than traditional bikes.

E-bikes are equally safe for the user as are traditional bikes. Another study completed in the Netherlands on the safety of e-bikes concluded that the use of e-bikes is not associated with an increased risk of being injured while biking.³ This suggests that individual safety for the user is the same no matter the type of bike.

E-Bike Use on Forest Service Lands

The State supports the Forest Service's proposed directive revisions to align with the 27 States and DOI's proposed e-bike rules to adopt a standard definition for an e-bike and a three-tiered classification for e-bikes and align with DOI's proposed e-bike rules in requiring site-specific decision-making and environmental analysis at the local level to allow e-bike use. The State supports the Forest Service's promoting e-bike use on NFS lands as an objective and trail management objectives in designating trails for motor vehicle use generally and to add criteria and guidance for designating e-bike use on NFS trails.

Thank you for the opportunity to comment on the proposed revised directives. The State is confident that the Forest Service can implement the proposed changes in a manner that mitigates potential conflicts, while providing new recreational opportunities for the public. Please direct any further questions to the Utah Public Lands Policy Coordinating Office at the number or address below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Clarke', with a long horizontal flourish extending to the right.

Kathleen Clarke
Director

³ https://www.itf-oecd.org/sites/default/files/docs/safety-e-bikes-the-netherlands_1.pdf (last visited June 8, 2020).