



*Empowering all to enjoy, share, and preserve the hiking experience*

October 26, 2020

Director  
Recreation Staff  
1400 Independence Avenue SW  
Washington, DC 20250-1124

*Submitted Electronically at regulations.gov*

RE: American Hiking Society Comments on Electric Bicycle Management in Forest Service Manual 7700 Travel Management; Chapter 7700, Zero Code; Chapter 7710 Travel Planning

On behalf of American Hiking Society (AHS), our members, supporters, and the millions-strong hiking community nationwide, we respectfully submit these comments on the Forest Service proposed changes to Forest Service Manual 7700 Travel Management; Chapter 7700, Zero Code; Chapter 7710 Travel Planning.

For the reasons discussed below, AHS strongly supports the continued classification of electric bicycles as motorized vehicles, and providing clarity by defining the classifications of “electric bicycle” under FSM 7705. We do not support permitting electric bicycle use on non-motorized trails, including those where bicycles are permitted, as may be interpreted under FSM 7715.5, given the lack of data and analysis on trail impact and the safety of all user groups.<sup>1</sup>

Our nation's public lands and trails provide access to millions of recreation users every year including hiking, mountain biking, equestrian use, and electric motorized bicycle use. As the Forest Service considers changes to the Forest Service Manual we encourage the agency to consider the impacts on all user groups, the trails themselves, and the surrounding environment.

### **7705 - Definitions**

We support the addition of a new definition of “electric bicycle” to FSM 7705 that defines electric bicycles as “a type of motor vehicle” and defines the current classifications of electric bicycles. Additionally, we support the increased access for electric bicycles that will be provided through this added definition, provided it’s where motorized vehicles are currently permitted.

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<sup>1</sup> AHS bases these comments on the organizations Electric Bicycle Position Statement, available at, <https://americanhiking.org/policy-positions/electric-bicycle-position-statement/>.

## 7715.5 - Criteria

FSM 7715.5 as proposed creates uncertainty as to whether electric bicycles could be permitted on non-motorized trails. We encourage the Forest Service to provide clarity that under these proposed changes motorized vehicles, including electric bicycles, are not permitted on non-motorized trails.

Specifically, “*Consider designating a class or classes of e-bike use, as appropriate, on NFS trails managed for bicycle use or where bicycle use is allowed, where effects from e-bike use would be comparable to effects from bicycle use.*” appears to leave open the possibility that non-motorized trails where bicycles are permitted could allow electric bicycles if the “effects from e-bike use would be comparable.” Sufficient data and analysis on the effects of electric bicycle use including the social and physical impact, safety of all trail users, trail impact, and the impact of the hiking experience doesn’t currently exist that would allow for a comprehensive analysis of their effect. We encourage the Forest Service to consider the possible impacts below.

### Social and Physical Impacts of Electric Bicycle Use on Non-Motorized Trails

AHS strongly supports the use of public lands for all types of recreation activities and for all types of users and welcomes the increased recreational opportunities that electronic motorized bicycles can provide on motorized trails and roads particularly for the elderly and disabled. However, to allow motorized recreation on non-motorized trails will degrade the natural, cultural, recreational and social values for which that land is managed. The hiking community seeks out Forest Service non-motorized trails for recreation, solitude, and the physical and mental benefits that these trails provide. This use will be impacted by electric bicycle use on non-motorized trails. We urge the Forest Service to continue to preserve non-motorized trails for non-motorized use.

### Safety of All Trail Users

The use of electric bicycles can jeopardize the safety of non-motorized trail users in several ways. First, many Forest Service non-motorized trails experience high visitation and usage. Adding electric bicycle riders to the mix will create more congestion. Increased congestion combined with already frequent conflicts on trails between fast-moving mountain bikes and slower-moving hikers and horseback riders can result in increased safety concerns on the trail.

Second, research by Brigham Young University<sup>2</sup> indicates that electric bicycles travel faster on average than mountain bikes, including the potential to travel quickly uphill, while other users are travelling quickly downhill, further increasing the risk for accidents. Higher speeds by one user group increases the risk for all user groups. Allowing potentially fast-moving electric bicycles on non-motorized trails will exacerbate these conflicts and further marginalize the hikers, equestrians, and other users whose safety and enjoyment are at risk. Given the limited research into electric motorized bicycle usage, it’s a logical assumption that users with limited experience or who might not otherwise ride a bicycle due to age or

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<sup>2</sup> Hall, et. al, 2019, Pedal-Assist Mountain Bikes: A Pilot Study Comparison of the Exercise Response, Perceptions, and Beliefs of Experienced Mountain Bikers (*JMIR Form Res* 2019;3(3):e13643). doi:[10.2196/13643](https://doi.org/10.2196/13643)

ability may access more challenging and remote non-motorized trails of which they are unfamiliar and unprepared, creating safety issues for both themselves and other users.

### Trail Impact

Electric bicycles may add more trail users onto non-motorized trails. These users will have the capability to travel a longer distance more frequently resulting in heavier use in previously less utilized and remote sections of trails. With the maintenance backlog for Forest Service trails at \$236 million, and the agency understaffed, it's unclear how the Forest Service will address the increased trail maintenance and management needs resulting from the impact of this type of usage.

### Electric Bicycle Use on Non-Motorized Trails Impact on the Hiking Experience

The hiking community often seeks out trails as a respite to their day-to-day lives. This includes seeking solitude away from motorized vehicles and technology to enjoy a quiet, slow-moving, natural environment. The addition of electric bicycles to non-motorized trails can lead to a reduction in the numbers of trails where hikers feel safe and welcome. The phenomenon of technological displacement can occur where recreation users with more advanced forms of transportation displace other users. Hikers, equestrian riders, and others could find it uncomfortable to share trails with fast electronic motorized bicycles coming from both directions, uphill and downhill, resulting in non-bicycle users essentially being forced off of these trails.

### **Conclusion**

AHS thanks the Forest Service for the opportunity to submit public comments and urges the agency to ensure that non-motorized trails will continue to be limited to non-motorized use, while expanding electric bicycle access to all motorized trails and roads where motorized use is permitted.