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Comments: The Potomac Appalachian Trail Club appreciates the opportunity to comment on the proposed revisions to e-bike directives as described in the Federal Register, Document Citation: 85 CFR60129 | Page: 60129 | Document Number: 2020-21128. We understand that this is part of the Secretary's guidance to expand access to the National Forests, particularly for the elderly and disabled. The directive includes updates to the definitions of e-bikes, adds a paragraph to the Forest Service Manual (FSM) 7702 to establish promotion of e-bike use on NFS lands as an objective, adds promotion of e-bike use on NFS lands as a policy, and adds a criterion to consider trail management objectives for both motor vehicle use generally and e-bikes specifically, and requires coordination for continuity of recreation experience.

Expanding access to the National Forests is a laudable goal. However, the guidance directive is to "... expand e-bike access while protecting natural resources." Nothing in the proposed revisions mentions impact of additional use and the resultant need for increased maintenance. This appears to violate what we have heard as National Forest policy restrictions against "new net maintenance." The proposed guidance also does not address what is understood to be a high level of deferred maintenance when adding new requirements. We highly recommend that maintenance that protects natural resources be addressed explicitly and credibly before adding a policy to promote additional use.

A second concern is the potential of the revised guidance to require more rescues. When persons hike or ride self-propelled bikes, they are naturally limited in how far they go into remote areas. Given that they must transport themselves back, they usually leave enough in reserve to safely return. When persons are able to use mechanical assist devices from a starting presumption of being less capable, it increases the likelihood that an accident or equipment failure will occur in a more remote area and will require emergency response. In the worst cases, it could actually lead to permanent harm to the users. Although anyone can have an accident in the forest, it would be prudent to explicitly address the need to consider emergency response prior to encouraging the elderly and disabled to use e-bikes on remote roads and trails.

PATC supplied over 5500 hours of volunteer maintenance in Government Fiscal Year 2020 despite the COVID-19 pandemic. We maintain trails and shelters under the direction of the George Washington and Jefferson National Forests. We care deeply about the multi-use trails within our area of responsibility. We cooperate with USFS staff and other trail users doing maintenance. As significant as these efforts are, many trails and roads are not in optimum shape already. Bicycle use can cause widening of trails, rutting in wet spots, and skid-outs at turns. If the additional maintenance needs are not addressed, the trails will further degrade. It appears inappropriate to enable increased e-bike access at this time. We recommend that the proposed guidance be withdrawn until these issues can be properly addressed.