Potomac Appalachian Trail Club

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September 17, 2026

Director
Public Benefits
201 14th Street SW,
Public Benefits Office
Washington, DC 20250

Re: Travel Management; National Forest System Lands, FS-2026-0100

Dear Director of Public Benefits:

I am writing on behalf of Potomac Appalachian Trail Club (PATC) to comment on the proposed revision of the Travel Management Rule (TRM). The TRM has been working well for over 20 years. We recommend keeping it as it is.

Founded in 1927, the more than 7,000 members of Potomac Appalachian Trail Club maintain 1,300 miles of hiking trails, 49 rental cabins and 45 hiking shelters. We work with 17 national parks plus two national forests, and multiple state and local parks and forests. Our geographical footprint covers 45,000 square miles in the Mid-Atlantic region. We connect people to the outdoors through volunteer service, educational and recreational opportunities.

PATC has a Volunteer Agreement with the George Washington and Jefferson National Forest (GWJ) to maintain trails in the North River and Lee Ranger Districts. PATC has contributed nearly 20,000 volunteer hours of trail maintenance in the GWJ North River and Lee Districts in the past three years alone. The value of our volunteer work for these three years is $722,800.00. PATC's volunteer labor represents a substantial, long-term public investment into the existing recreation network.

While the stated purpose of the TRM revision is to increase access, including for motorized vehicles, e-bikes, and other mobility devices, the TRM revisions could actually reduce access and greatly diminish non-motorized use of the National Forest trail system. Non-motorized users include hikers, naturalists, equestrians, and mountain bikers. Travel management changes that increase motorized use of trails, cause more erosion, or increase maintenance needs would shift additional costs onto volunteers.

The addition of motorized users to the trail system would cause significant damage to trails that were not built for motorized use. The noise, odors, and speed that come with motorcycles, ATVs and off-road vehicles is not compatible with non-motorized use. Many non-motorized users are seeking solitude, natural beauty, and the sounds of nature, not the revving of engines or the smell of gasoline or diesel. Motorized vehicles create air pollution, especially due to tail pipe emissions, but also due to road dust and fuel evaporation. They can also cause water pollution due to leaking lubricants and increased soil erosion. Almost all trails in the GWJ are too narrow to allow hikers and motorized vehicles to pass. E-bikes are faster than human-powered bicycles, can go much farther, and can accelerate uphill, increasing the level of danger to all non-motorized trail users, even human-powered bicycles.

Increasing motorized use of the trail system will destroy wildlife habitat and scare wildlife away. This diminishes the experience of non-motorized trail users who enjoy viewing wildlife. The GWJ has places that are designated for motorized vehicles now, and motorized access is sufficient.. Motorized use of trails is simply not compatible with hiking and other non-motorized uses.

In addition, this proposed rule places an unfair burden on Forest Service personnel who are already drastically understaffed. Some of the National Geographic Trails Illustrated Maps for the GWJ have not been updated for decades. Redoing the whole Travel Management plan seems like an impossible task for the agency. Making and installing new signs would be a huge cost. At present the Forest Service does not have the budget or capacity to replace signs that are missing or damaged. Forest Law Enforcement is also understaffed. This rule revision would require more law enforcement officers.

PATC is particularly concerned about user-created roads and temporary fire lines becoming "open roads" with the proposed revision. If everything that looks like a road is open unless it is designated as closed, then it seems that it would be legal for motorized vehicle use. ATVs could do a lot of damage very quickly, and law enforcement could not do anything about it. Some of the trails our volunteers maintain are occasionally used for fire breaks for prescribed burns. These would be open roads if the revisions are put into place.

We offer the following comments on the text of the proposed revisions:

- The current policy of "minimum road systems" in national forests should be retained in the Travel Management Rule (TMR). While certain procedures and processes may be streamlined or improved in the TMR regulations, the underlying "minimization" policy set forth in 36 CFR 212.5(b) should be retained.
- The proposed rule cites Executive Order 14408 as the basis for rejecting the "minimization" policy. Executive Order 14408 was issued to "facilitate the replacement of current regulations with a system for off-road vehicle use designation that provides more access, recreational opportunities, and greater multiple use benefits to the public," and to "restore balanced land management by eliminating ill-defined and arbitrary environmental and social standards, thereby ensuring that all public land users will be granted access on equal terms". Executive Order 14408 also states that the current policy "result[s] in barriers to energy and timber production and utility maintenance,

permit delays, and de facto bans on hiking and other forms of recreation that require accessing remote areas." The current environmental and social standards that support the minimization policy are well supported and consistent with sustainable public use of national forest resources. Suggesting that energy and timber producers are "public land users" is inconsistent with the general understanding of that term.

- The proposed rule cites "increasing public recreation and access needs" and "changing recreation technology" as two bases for allowing motor vehicle use on roads and trails currently closed to their use. These are not supported in the proposed rule, except for a discussion of potentially redefining class 1 electric bicycles, presumably a "changing recreation technology," as non-motorized vehicles. Class 1 ebikes have a maximum speed of 20 miles per hour with assistance from the motor when the rider is pedaling. Allowing class 1 ebikes on any road or trail on which non-motorized bikes are authorized is not compatible with hiking, biking and horseback riding.
- The proposed rule also discusses authorization of "off-route motor vehicle" and "other motorized equipment" for certain activities such as big-game retrieval, firewood collection, dispersed camping and "motorized recreation." The current Forest Service Manual 7700 already provides that authorization for use of a motor vehicle for big-game retrieval and dispersed camping should be used sparingly in order to maintain consistency with the Travel Management Rule. There is no indication in the proposed rule of how "other motorized equipment" or "motorized recreation" would be defined.

As you prepare an EIS for the proposed TRM revisions, we ask that you consider the impact of these changes on non-motorized users regarding their enjoyment of the natural world, noise, smells, air pollution, and on wildlife, introduction of non-native invasive species onto trails, safety of non-motorized users, and the impact on local communities whose economies depend on recreational tourism. Please also consider damage to trails and who will bear the cost of fixing that damage. Our national forest managers do not have adequate resources to maintain roads and trails; the cost will likely be passed on to volunteers, like PATC trail maintainers.

If these changes are being proposed to enhance timber and energy development, please be aware that more logging and energy development are incompatible with non-motorized enjoyment of our public lands. The GWJ is the closest national forest to over 10 million people in the Mid Atlantic region. Recreation is the best use of the GWJ where some of the most outstanding scenic beauty, the greatest biodiversity on the planet, and outstanding access trails are found. The current balance of opportunities for non-motorized and motorized use is about right. We recommend you take no action to revise the current Travel Management Rule.

Thank you for the opportunity to comment.

Sincerely,

Jim Fetig
President

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