



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

Oct. 30, 2026

National Park Service
Division of Regulations
7206 National Seashore Lane
Berlin, MD 21811

Re: NPS RIN 1024-AE97, Bicycle Use in Park Areas

To Whom It May Concern:

On behalf of American Hiking Society (AHS), our supporters, and the 63 million strong hiking community nationwide, we respectfully submit these comments on the National Park Service proposed rule, Bicycle Use in Park Areas.¹

American Hiking Society is proud to join with Back Country Horsemen of America on the recommendations below and we thank them for their leadership in the development of the recommendations.

National Park Service Trails Provide Benefits to All User Types

Our nation's public lands and trails provide access to millions of recreation users every year including hiking, mountain biking, equestrian use, and e-bike use. As NPS considers the proposed rule we encourage the agency to consider the impacts on all user groups.

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 e-bikes to non-motorized trails can lead to a reduction in the number 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, equestrians, and others can find it uncomfortable to share trails with fast moving e-bikes coming from both directions, uphill and downhill, resulting in non-bicycle users essentially being forced off these trails. This is especially true with e-bikes allowing farther access on trails deep into remote areas and not limited by significant elevation change that would otherwise be prohibitive for bicycles.

Procedural Concerns

¹ American Hiking Society, Electric Bicycle Position Statement (June 2020), <https://americanhiking.org/electric-bicycle-position-statement/>; American Hiking Society, Mountain Bike Position Statement, <https://americanhiking.org/mountain-bike-position-statement/> (October 2013)

The addition of expanded bicycle use, specifically e-bike use, raises concerns over trail conflict and safety, increases trail maintenance needs, and displacement of hikers and other trail users. We believe added safeguards are justified to ensure that visitors' safety and shared-use trail compatibility remain fully addressed as access opportunities expand. The recommendations below are intended to strengthen the rule by providing practical tools for identifying and mitigating foreseeable conflicts among trail users while continuing to support appropriate bicycle and e-bike access.

While the proposed rule would keep authority for superintendents to impose restrictions, conditions, limitations, and closures, when necessary, it would also eliminate or reduce existing procedural requirements associated with bicycle-use designations. The proposed rule provides no specific requirement that potential hiker-cyclist or equestrian-cyclist interactions be evaluated before bicycle and e-bike use is authorized on administrative roads or trails. Our concern is not opposition to bicycling or e-bike access. Rather, we are concerned that reduced procedural review may also reduce opportunities to:

- Evaluate hiker-bicycle and horse-bicycle interaction risks before access decisions are made;
- Consult with hiking and equestrian organizations and other affected user groups;
- Identify site-specific safety concerns;
- Develop mitigation measures before implementation; and
- Monitor changes in visitor experience following designation decisions.

Recommendations

Because the proposed rule would streamline authorization of bicycle and e-bike use on administrative roads and trails, we respectfully request that the National Park Service incorporate additional safeguards to ensure that visitor safety and shared-use trail compatibility are adequately considered before new designations are approved.

We propose the following seven safeguards be incorporated into the final rule.

1. Require a Written Shared-Use Safety Analysis

Before designating an administrative road or trail for bicycle or e-bike use where hiking and equestrian use presently occurs, the superintendent should be required to conduct a written shared-use safety analysis that evaluates:

- Existing hiking and equestrian use levels;
- Trail width and tread conditions;
- Sight distance and visibility constraints;
- Trail grade and blind corners;
- Expected frequency of hiker and horse encounters with bicycles;
- Speed differentials among users;
- Known conflicts or safety incidents; and
- Available mitigation measures.

The safety analysis should be made available to the public prior to implementation.

2. Require a Consultation with Affected User Groups

Before authorizing bicycle or e-bike use on trails or administrative roads with established hiking and equestrian use, the National Park Service should provide notice and an opportunity for input from:

- Local hiking and equestrian organizations;
- Bicycle organizations;
- Commercial outfitters and guides, where applicable; and
- Other affected trail-user groups.

This requirement would preserve meaningful stakeholder participation even when formal rulemaking is not required.

3. Establish Mandatory Safety Findings

The final rule should require superintendents to make written findings part of the administrative record that:

1. The proposed designation will not create unreasonable safety risks to existing trail users;
2. Adequate sight distance and safe passing opportunities exist or will be provided;
3. Appropriate mitigation measures have been identified;
4. The designation is consistent with visitor-use management objectives; and
5. The designation is consistent with protection of visitor safety and visitor experience.

4. Require Evaluation and Implementation of Mitigation Measures

When hiking and/or equestrian use exists on a proposed bicycle or e-bike route, the National Park Service should have to evaluate and implement site-specific mitigation measures where called for, including:

a. Yield and On-Trail Encounter Requirements

The final rule should set up enforceable operating requirements requiring bicyclists and e-bike riders to:

- Yield to hikers and equestrians;
- Reduce speed to a walking pace when approaching or overtaking hikers or horses;
- Provide verbal notification before passing horses; and
- Follow directions provided by the rider regarding safe passage.

b. Speed Management

The National Park Service should evaluate:

- Posted speed limits in areas with frequent hiking or equestrian use;

- Reduced-speed zones near trailheads, intersections, and blind corners;
- Added management measures where speed differentials between users present elevated risk.

c. Trail Design Improvements

The National Park Service should evaluate:

- Sight-distance improvements;
- Trail widening at constrained locations;
- Pull-outs and passing zones;
- Warning signage at blind corners; and
- Improvements to trail intersections where encounters are likely.

d. Education and Outreach

Federal trail-management literature recognizes information and education as important conflict-mitigation tools.² The National Park Service should provide:

- Trailhead signage describing proper on-trail interaction protocols;
- Visitor information concerning yielding requirements;
- Information explaining horse behavior and startle responses; and
- Educational materials for cyclists, e-bike users, equestrians and hikers.

5. Require Monitoring and Corrective Action

For trails or administrative roads newly designated for bicycle or e-bike use where hiking and/or equestrian use occurs, the National Park Service should have to:

- Track reported safety incidents and user-conflict reports;
- Maintain a mechanism for stakeholder reporting;
- Periodically evaluate conditions following implementation; and
- Document findings.

Where monitoring shows recurring conflicts or safety concerns, the superintendent should be required to evaluate corrective actions, including:

- Additional restrictions;
- Speed limitations;
- Seasonal or temporal closures;
- Route redesignation; or
- User separation measures.

6. Require Additional Review for High-Risk Trail Conditions

² Moore, R. L. (1994). *Conflicts on multiple-use trails: Synthesis of the literature and state of the practice*. Federal Highway Administration & National Recreational Trails Advisory Committee. [\[railstotrails.org\]](http://railstotrails.org)

The final rule should require added review before bicycle or e-bike use is authorized on trails characterized by:

- Limited visibility;
- Narrow tread widths;
- Blind corners;
- Steep grades;
- Moderate or high levels of existing equestrian and/or hiking use; or
- A documented history of user conflicts.

7. Add Regulatory Language Addressing Shared-Use Safety

We encourage the National Park Service to add the following language, or language of similar effect, to the final rule:

- "In designating roads, trails, and other locations for bicycle or electric bicycle use, the superintendent shall evaluate reasonably foreseeable impacts to visitor safety, including interactions among bicyclists, electric bicyclists, equestrians, hikers, and other authorized users, and shall implement appropriate mitigation measures where necessary to provide for safe shared use."

Such language would ensure that visitor safety stays an explicit and enforceable consideration within future bicycle and e-bike designation decisions.

Conclusion

We respectfully ask that the agency ensure that decisions on new bicycle and e-bike designations are supported by documented safety evaluations, stakeholder engagement, enforceable operating requirements, and effective monitoring and mitigation measures. Federal trail-management guidance recognizes that hiker-bicycle and horse-bicycle interactions present legitimate management considerations on shared-use trails.

The recommendations presented in these comments are intended to ensure that the final rule keeps the flexibility sought by the National Park Service while providing clear safeguards for visitor safety and shared-use trail management. Incorporating these provisions would strengthen the final rule, improve transparency in designation decisions, and help support positive recreational experiences for all trail users. We respectfully urge the National Park Service to incorporate these recommendations as it develops the final rule and to ensure that safety and shared-use trail considerations stay an explicit part of future bicycle and e-bike designation decisions.

Respectfully submitted,

Tyler Ray
Senior Director for Programs and Advocacy
American Hiking Society