



Appalachian Trail Conference

Dear Appalachian Trail Activist:

We are writing to advise you that, on February 17, the USDA Forest Service published in the *Federal Register* new proposed “interim directives” related to access and use for persons with disabilities of outdoor recreation resources situated on National Forest System lands. The Forest Service is seeking public comments on the directives, which, if adopted, will affect the design and construction of many outdoor recreation facilities and elements, including hiking trails in both developed and primitive settings, within the National Forest System. The deadline for public comments is April 18, 2005.

The purpose of the proposed interim directives is “to ensure that new or reconstructed... outdoor recreation areas on National Forest System lands are developed to maximize accessibility, while recognizing and protecting the unique characteristics of the natural setting,” and to “address required accessibility of outdoor recreation facilities and hiking trails not addressed by existing accessibility standards.”

The draft directives are contained in two separate documents: (1) Forest Service Outdoor Recreation Accessibility Guidelines (FSORAG), which apply to new or altered “constructed features” including many of those located at campsites, picnic areas, overlooks, the routes connecting those facilities, and beach access routes; and (2) Forest Service Trail Accessibility Guidelines (FSTAG), which apply specifically to trails and associated elements including trailhead signage and campsite elements such as shelters, huts or cabins, privies, fire rings, and benches and picnic tables. While both sets of guidelines or directives are potentially relevant to long-distance trails, as well as connecting trails and trail-related elements, the guidelines contained in FSTAG probably have the most direct bearing on the sorts of situations and elements commonly encountered along the Appalachian Trail. Specifically, FSTAG will apply to all newly constructed or altered trails or trail segments that either connect to a developed trailhead or that connect to another trail or trail segment that is deemed to be accessible.

It should be noted that, even if the trail section you most commonly maintain or manage is not located within a national forest, the proposed directives still may be relevant in your area of interest at some point in the future. That is because, while the Forest Service is the first federal land-management agency to release such guidelines or directives, the Architectural and Transportation Barriers Compliance Board (a.k.a. Access Board) is expected to release its version of the guidelines before the end of the year, and those guidelines would affect all federal land-management agencies, including the National Park Service. To further complicate matters, there are differences between the two sets of guidelines. In some cases, the Forest Service guidelines are more restrictive. In other cases, the Forest Service makes certain distinctions in the application of proposed technical provisions, as well as exceptions to those provisions, that are based on agency-specific practices,

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A volunteer-based nonprofit organization responsible for the management and protection of the Appalachian Trail since 1925

such as trail-classification schemes and distinctions between highly developed recreation areas and general forest areas (GFAs), while the Access Board's guidelines presently do not include such distinctions. The Forest Service is particularly interested in public comments that address the appropriateness of those distinctions or adaptations.

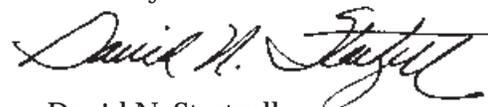
Both FSORAG and FSTAG contain extensive background information in the form of a preamble, a discussion of the rationale for general and specific exceptions, the actual technical provisions, and an appendix that includes definitions of terminology used in the document, applicable citations from the Architectural Barriers Act Accessibility Guidelines, and illustrations. In addition, in the case of FSTAG, the appendix also includes a detailed flowchart that is intended to illustrate the evaluation and decision-making process that trail managers would follow in seeking to assess conditions that might warrant exceptions from application of the technical provisions relating to such issues as running slope, cross slope, surface conditions, protruding objects, natural barriers, *etc.*

Copies of both the FSORAG and FSTAG documents may be obtained on-line at the following URL: <http://www.fs.fed.us/recreation/programs/accessibility>. Comments may be sent by mail to: USDA Forest Service, Attn: Director, Recreation and Wilderness Resources, 1400 Independence Avenue, S.W., Mail Stop 1125, Washington, DC 20250-1125. Written comments also may be transmitted by electronic mail to the following addresses: comments related to FSORAG: rhwrdevrec@fs.fed.us; comments related to FSTAG: rhwrtrail@fs.fed.us. Finally, written comments may be transmitted by facsimile to (202) 205-1145. The Forest Service requests that comments transmitted by email or facsimile not be duplicated through submission by regular mail. Again, the comment deadline is April 18, 2005.

The proposed directives could have a significant impact on some—perhaps many—sections of the Appalachian Trail and, at a minimum, will influence the manner in which volunteer trail workers and their Forest Service partners approach trail and campsite design and construction. As an A.T. activist, while this admittedly is not a “fun read,” we believe it is important for you to review the two documents (especially FSTAG) and to submit comments about any specific provisions or proposed exceptions that may be of interest or concern and on the general clarity and usability of the documents. If you do comment, please share a copy of your comments with ATC by mail to Trail Management Assistant, ATC, P.O. Box 807, Harpers Ferry, WV 25425 or via email to: accessibility@appalachiantrail.org.

The Appalachian Trail Conference staff is conducting a thorough review of both documents now, with the aim of preparing formal comments by the end of March. When completed, those comments will be posted at the ATC Web site: <http://www.appalachiantrail.org/protect/issues/access.html>. Background information, links to the Forest Service accessibility Web site, and other relevant links are currently available at that location.

Sincerely,



David N. Startzell
Executive Director