

**Differences between the Proposed Access Board Guidelines and
Forest Service Trail Accessibility Guidelines (FSTAG) and
Forest Service Outdoor Recreation Accessibility Guidelines (FSORAG)**

- The proposed Access Board guidelines have added the definition for alteration that applies to buildings but does not fit trails. *The final Access Board guidelines need to clarify that the definition of alteration does not apply to trails.*
- *The definitions for alteration and for maintenance of trails in the original Regulatory Negotiation Committee's 1999 Report (page 6) must be included in the definitions section of the final Access Board guidelines, just as they are in the definitions section of the FSTAG. Those original report definitions are clear and applicable to the trails.*
- In the proposed Access Board guidelines, there is no exception provided for protruding objects below 80 inches in height when they occur on a trail where placing a warning barrier would block passage down the trail. *Such an exception is needed in the final Access Board guidelines.*
- The proposed Access Board guidelines include the International Symbol of Accessibility (the ISA, which is the wheelchair symbol) in each of the sample trail signs. The use of that symbol in relation to trails will lead the public to expect an ease of access that will not be there even when a trail complies fully with the guidelines because grades up to 12.5 percent are appropriately allowable under the guidelines. *Instead, the final Access Board guidelines should not use the ISA, but should require information to be posted that is useful to all trail users in determining which trail best meets their skills and available resources, including maximum grade, cross slope, minimum width and so forth, as detailed in the FSTAG 7.3.10.*
- The Access Board has rewritten the 2nd General Exception. It no longer states what the Regulatory Negotiation Committee Report intended. As it currently written it is confusing and appears to imply that only 15 percent of the length of a trail ever needs to be accessible, which is not correct. *The final Access Board guidelines must go back to the original Regulatory Negotiation Committee's language for the 2nd General Exception.*
- The Interagency Trail Data Standards (ITDS) have been adopted by the Forest Service, Bureau of Land Management, National Park Service, Fish and Wildlife Service and Bureau of Outdoor Recreation. The ITDS include standardized trail terminology, definitions, and standardized management concepts including Trail Classes, Designed Uses and Managed Uses. *The final Access Board guidelines must integrate the ITDS terminology, definitions and trail-management concepts of trail classes, designed use and designated use, including within the Conditions of Departure, in order for the final Access Board guidelines to be useable within the federal agencies trails structure. The ITDS website is <http://www.nps.gov/gis/trails>.*
- *Outdoor Recreation Access Routes (ORARs) should not be required in areas that are not developed recreation sites.*

In areas where facilities/constructed features such as fire-rings or pit toilets are placed primarily because they are needed for resource protection, including adjacent to trails and in undeveloped areas, the trail specifications should apply to the route to the facilities rather than the ORAR specifications, in order to blend the route to those facilities into the undeveloped setting. Facilities constructed or altered anywhere, including adjacent to trails or in undeveloped areas, must be both appropriate to the setting and accessible, in compliance with the Architectural Barriers Act requirement of facility access for all.

The proposed Access Board guidelines only address the routes to facilities in developed recreation areas. *The final Access Board guidelines need to make a distinction between developed recreation areas and undeveloped areas where facilities are placed primarily for resource protection.* Unless that distinction is made, the FSORAG will have to be changed so that facilities in undeveloped areas would be required to be connected to an ORAR and that would have negative impact on undeveloped areas.

- *Exception for Outdoor Recreation Access Route grade/slope is needed for alterations/reconstruction.* The Outdoor Recreation Access Route (ORAR) technical specifications for the pathways that connect facilities work well in most newly constructed campgrounds and picnic areas, where the Forest Service has the opportunity to select the location for that developed recreation site. In older, developed recreation areas, due to the terrain of the site where a campground or picnic area was originally constructed, when a site is altered or reconstructed, it may not be possible for the entire length of the ORAR to meet the grade requirements without a significant change to the natural environment. In the FSORAG, that situation is recognized as a condition for departing from the guidelines and an exception is allowed, so the grade/slope specifications in that section of that ORAR would not have to be met, thereby maintaining the natural setting.

However, the proposed Access Board guidelines do not permit any exceptions to the ORARs technical specifications, regardless of the terrain, historic, cultural or environmental factors, even in alteration/reconstruction situations. *The final Access Board guidelines need to include an exception for ORARs in alterations of existing sites, so when a section of an ORAR in those alteration locations can't meet the ORAR maximum-grade specifications there is an exception available.*

If the final Access Board guidelines do not include such an exception, the FSORAG will have to be changed to not permit any exceptions to meeting the ORAR specifications in alterations of existing sites. That change would have a negative impact on incorporating accessibility while protecting the natural environment at existing recreation areas

Any questions concerning this summary document should be directed to Janet Zeller, USDA Forest Service National Accessibility Program Manager, at jzeller@fs.fed.us.