To Whom It May Concern:

I object to attempts to legalize electronic motor bikes (e-bikes) on non-motorized trails.

I oppose any effort that would allow any class of vehicle with a motor – including all classes of e-bikes, which have a motor – to be allowed on non-motorized trails.  A contrary interpretation would create an unmanageable slippery slope and threaten future management of all non-motorized trails and areas on public lands.

Non-motorized trails were created to ensure that the public could find recreational trail opportunities free from the ever-growing motorization and mechanization.  Millions of public land users including hikers, backpackers, hunters, horse packers, climbers, mountain bikers and many more, value non-motorized trails for recreation.  Opening non-motorized trails to motors would forever change the backcountry experience for these users.

Land management agencies are currently considering policy changes to allow e-bikes on non-motorized trails. Such a policy is ill-advised and would undermine nearly a half century of management precedents and practices. First, allowing e-bikes on non-motorized trails would be un-manageable and send agencies down a slippery slope towards allowing further motorization of trails and potentially the entire backcountry. Federal land managers simply do not have the resources to police e-bikes on trails.

Second, permitting e-bikes on non-motorized trails is contrary to long-standing “travel management” laws and policies that require all motorized recreational uses of our public lands to be confined to a system of designated roads, trails, and areas. Among other requirements, motorized trails must be located to minimize conflicts with other recreational uses of the public lands, as well as damage to soil, water, and other public land resources and harassment of wildlife. Separately, agencies are required to manage certain wildlands – including Wilderness Study Areas, Forest Service recommended wilderness, and BLM lands managed for wilderness characteristics – to preserve and protect wilderness character. National Scenic Trails are also required by law to be managed as non-motorized trails. In short, current laws and policies require that non-motorized trails remain non-motorized, and any contrary interpretation could only be supported, if at all, through full notice and comment rulemaking processes.

Opening non-motorized trails to motorized bikes eliminates the non-motorized, primitive recreational opportunities. I strongly oppose any effort to change existing trail management rules or policies and encourage all federal land management agencies to reject any effort to open non-motorized trails to e-bikes or other motorized vehicles.

Sincerely,

Tom Manthey

Billings, MT