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Title:

Comments: FROM: Friends of Thompson Park, Butte, Montana

As the Forest Service proposes to revise its directives to update and clarify guidance on management of electric bicycle (e-bike) use on National Forest System lands, we as members of the all-volunteer, non-profit Friends of Thompson Park, in Butte, Montana, would like to express our concerns.

Simply said, we oppose the use of e-bikes -- of any class -- on non-motorized trails. E-bikes are motorized vehicles, powered by an electric motor. They are similar to a motorcycle, powered by gasoline. There are miles and miles of scenic motorized trails on our nation's public lands, so e-bike users, including the elderly and disabled, have ample opportunities to ride. Even with the proposed changes, e-bikes are still considered **MOTORIZED VEHICLES** that fall under the 2005 Travel Management Rule.

By allowing even one class of bike, say Class 1, on a non-motorized trail, you open the door to conflicts with hikers, self-propelled bikers, horse riders, birders and other users. The problems that arise by allowing e-bikes on non-motorized trails are many. To begin, who would monitor the usage? Who would check to see if the e-bike falls within whatever classification that might be allowed? What if it doesn't? How would you monitor and ticket speeders/offenders? Can you imagine a non-experienced cyclist on an e-bike, trying to navigate narrow non-motorized trails occupied by, say, families with small children or other self-propelled bikers? The situation puts all parties in jeopardy. Why would the Forest Service want to open this can of worms? Many forests have completed travel management plans, designating allowed uses on trails. This could open up additional travel management issues that take years and money that could be spent to ensure trails are well maintained for the current allowed use.

As the technology advances, it's just a matter of time before e-bikes become faster, more powerful and more dangerous to non-motorized trail users.

Let's keep our non-motorized trails non-motorized. Signs at trailheads that inform users that e-bikes are not allowed should also list nearby motorized routes for such riders to consider.

In conclusion, we would like to share this quote from Darrell Wallace, chairman, Back Country Horsemen of America. We whole-heartedly agree with him:

"This decision (to allow e-bikes on non-motorized trails on public lands) sets the stage for motorizing America's backcountry, which violates the principles and partnerships that we have worked so hard to secure over many years. We believe there is a place for motorized bikes, but nonmotorized trails - by definition - are not the right place."

Thank you.

Janet Axelson, president

Jocelyn Dodge, vice president

Christal Smith, treasurer

Carmen Winslow, secretary

Friends of Thompson Park

ABOUT US:

Friends of Thompson Park is a multiple use organization that includes all users of the park whether you are a hiker, horseback rider, bicyclist, disc golfer, birder or anyone who has a desire to ensure the park is maintained for enjoyment by the public.

The park, located 10 miles south of Butte, Montana, in the Beaverhead-Deerlodge National Forest, encompasses 3,500 acres. It was established in 1922, and underwent rehabilitation in 2012 through grants from the Natural Resource Damage Program, Recreation Trails Program, and Forest Service funds. Over 25 miles of trails are available for non-motorized recreation including the Milwaukee Rail Trail that connects to the Continental Divide National Scenic Trail and three picnic areas.

The park is managed through a cooperative effort with the U.S. Forest Service and Butte-Silver Bow County, Butte, Montana.

