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Comments: Motorized e-bikes are, in general, a great substitute for fossil-fuel-powered motorized vehicles, and they should be welcome wherever other motorized vehicles are allowed (including the tens of thousands of miles of trails on federal land that already allow motorized travel and recreation, and the 300,000 miles of singletrack, doubletrack and natural surface roads accessible to motorized eMTBs within the US) . They could also be a great way for people suffering from chronic illness or injury, or senior citizens (65+) to enjoy mountain biking on trails on public land designated non-motorized, but only if this can be effectively regulated.

Motorized eMTBs are currently being pushed hard by the bike industry, including the corporate lobbying arm of the bike industry "People for Bikes"; Not coincidentally, motorized eMTBs cost, on average, four times the price of wholly-human-powered mountain bikes (average cost: ~\$4,000 vs ~\$1,000). The bike industry is pushing eMTBs now because the Trump administration is amenable to allowing motorized vehicles on public land that has formerly set aside for non-motorized recreation, and the bike industry recognizes that they must force a change to long-established laws designed to protect the environment and non-motorized trail users while they have a chance to undo environmental standards other administrations would support, e.g. reserving a small amount of the total trails on public land as non-motorized trails for non-motorized recreation.

The crucial difference between a wholly-human-powered mountain bike and a motorized eMTB is the difference between "motorized" and "mechanized," as these words were defined in the 1984 amendment to the Wilderness Act. Bicycles have been "mechanized" since their invention; indeed, their mechanization is what allows them to be the most efficient form of transportation the world has ever seen. Adding a motor to a bicycle fundamentally alters the machine; it is no longer merely "mechanized"-using mechanical advantage to drive improvements in the efficiency of human power-and it is now "motorized"-drawing power from an external source outside of the human body. This means motorized eMTBs are different from wholly-human-powered bicycles in both the physical and legal sense-they're motorized-and as such no amount of legal, mental or moral gymnastics can allow them on non-motorized trails in good conscience. Indeed, according to The Forest Service's Travel Management Rule (TMR), "New technologies that merge bicycles and motors, such as e-bikes, are considered motor vehicles under 212.1 of the TMR."

eMTBs are motorized, and as such shouldn't be allowed on non-motorized trails (unless they can be specifically permitted to chronically ill or injured persons, or senior citizens [65+] as mentioned above, and providing that trail use for these permitted groups-and only these groups-can be regulated). Equating them to wholly-human-powered mountain bikes, and riding one when you suffer from no underlying health issues and could simply improve your fitness and health via discipline, diet and exercise-as people have done for millennia, and as mountain bikers have done for decades-fundamentally changes mountain biking at its most basic level; it is no longer mountain biking as it has been legally defined for decades-"mechanized"-but a new activity unto itself: "motorized."

At the same time, there is nothing stopping able-bodied people from enjoying nature and non-motorized trails as the laws are currently written. Americans are, in general, hardy and hard-working, and more than willing to put in the effort to explore the outdoors under the power of their own body; on non-motorized trails, wholly-muscle-powered adventure is an enormous part of what makes the experience unique and a desperately needed escape from the massively motorized world in which we live. This is the very reason that small areas of public non-motorized trail systems have been preserved; to give people the opportunity for a "non-motorized recreational experience." Reserving the few remaining areas on our public lands for human-powered recreation doesn't seem like an unreasonable ask.

More importantly, allowing motorized eMTBs on non-motorized trail systems fundamentally changes the nature of those trails, from "non-motorized" to "motorized." By doing so, it sets a dangerous legal precedent that may eventually lead to any type of motorized vehicle being allowed on trails formerly designated "non-motorized", effectively eliminating the "non-motorized" designation enjoyed by hikers, runners, equestrians, wholly human-powered mountain bikers and other non-motorized user groups, and leading to environmental degradation far worse than anything possible from wholly-human-powered or equine recreation alone.

Perhaps most concerning, mountain biking advocacy groups spent decades working with land managers to persuade them that mountain bikes are "mechanized," not "motorized," and that mountain bikers should consequently be treated as non-motorized trail users and be able to share non-motorized trails with wholly human-powered mountain bikers, hikers, runners, equestrians, and any and all types of non-motorized recreationalists. Indeed, permitting e-bikes on non-motorized trails runs contrary to long-standing 'travel management' laws and policies dating back to the Nixon administration that require all motorized recreational uses of our public lands to be confined to a system of designated roads, trails and areas.

The introduction of motorized eMTBs completely negates the argument that mountain bikers should be designated as a non-motorized user group, and it consequently jeopardizes both mountain bike trail access that has already been awarded on non-motorized trail systems and any access that might be granted in the future; the attempt to change regulations to provide motorized eMTBs access to non-motorized trail systems threatens access to those same systems for wholly human-powered mountain bikers.

As noted above, there already exist tens of thousands of miles of trails open to motorized recreation on our public lands, and 300,000 miles of singletrack, doubletrack and natural surface roads accessible to motorized eMTBs within the US. For this reason, with the exceptions noted above-people suffering from chronic illness or injury, or senior citizens (65+)-motorized eMTBs should not be permitted on non-motorized trails.

In the words of The Wilderness Society:

"Allowing e-bikes-or any other motorized vehicles-on non-motorized trails would set a dangerous new precedent, undermining nearly 50 years' worth of travel management law and opening the door for broader motorized recreation in places that are intended solely for non-motorized use. It would be a huge change that would forever alter the experiences people have on the trail when they visit public lands.

It's no secret that the Trump administration has set new and ignominious standards with its countless attacks on our shared lands and waters. Opening non-motorized trails to e-bikes would fit right into that track record." All this said, acknowledging that Forest Service land is public and open for all to enjoy, an alternative for motorized eMTB riders to consider would be for them to work with land managers, and advocate for and build environmentally-conscious eMTB-specific trails, as human-powered mountain bikers have done for decades; a win for everyone.