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Comments: I am writing to object to any attempt by public land management agencies 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 by definition 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.

While e-bikes have a place on public lands and generally should be allowed where motorized vehicles are permitted. The existing motorized trail system provides plentiful opportunities for e-bike use with tens of thousands of miles of trails currently open to their use.

The Bicycle Products Suppliers Association, international power equipment companies and e-bike user groups created a classification system for e-bikes, based on motor and battery sizes and engagement systems for the motor.[1] This classification system is confusing for land managers and lawmakers and the bikes themselves are often difficult to distinguish from one another. The fact remains that all e-bikes are motorized by definition, regardless of the size of the motor or how it is turned on.

We understand that federal land management agencies are currently considering policy changes to allow e-bikes on non-motorized trails. Such a policy would undermine nearly a half century of management precedents and practices. First, allowing e-bikes on non-motorized trails would be unmanageable 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 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.[2] 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.

Millions of public land users across the country enjoy both motorized and non-motorized recreational experiences. Opening non-motorized trails to motorized bikes would effectively eliminate the non-motorized, primitive recreational opportunities. I join others who 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.