

Data Submitted (UTC 11): 10/26/2020 9:19:18 PM

First name: Marc

Last name: Thomas

Organization:

Title:

Comments: Permitting class 1 e-bikes on non-motorized trails violates 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 (Executive Orders 11644 and 11989; 43 C.F.R. part 8340; 36 C.F.R. part 212). 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. Maintaining non-motorized uses in those areas is a critical component of fulfilling those obligations. 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.