Attention: RIN 1004-AE72

Dear Secretary Bernhardt,

Thank you for the opportunity to comment on the Bureau of Land Management’s (BLM) proposed rule allowing motorized bicycles (e-bikes) on non-motorized trails.  I write today to vehemently oppose this proposed rule. I am a hiker, backpacker, mountain biker, wildlife watcher, and citizen scientist and enjoy the visiting our public lands.

By definition e-bikes have motors, therefore e-bikes are a motorized form of transportation and recreation and have no place on non-motorized trails. The BLM proposed rule is inconsistent with existing laws and policies and undermines efforts over the decades to plan, fund, and construct a system of non-motorized trails.

BLM acknowledges in its proposed rulemaking that motorized e-bikes are “currently allowed on the majority of roads and trails” on BLM-administered public lands. E-bikes already have plenty of miles to ride and should not encroach on non-motorized routes.

E-bikes allow users to move faster and cover greater distances with increased ease. This fact results in deleterious impacts on natural resources including wildlife and wildlife habitat, riparian areas, sensitive botanical species and soils. Recreation continues to fragment habitat and the more miles a user can travel, the greater the impact. Just recently I learned of my own extended family acquiring e-bikes and how they are riding 20 to 30 miles on and off trails on an outing when previously they typically would have ridden 3 to 5 miles on roads or paved trails.

Furthermore, possibilities for user conflict increases with expanding non-motorized trails to motorized use. Envision equestrians encountering one or more e-bikes on a single-track trail, for example. My experience as a backpacker approached from the rear by a mountain biker is unsettling enough given their relative speed and quick approach. I shudder at the thought of e-bikes overtaking a quiet user. Moreover, agricultural producers have grazing allotments on BLM acreage that could be opened to e-bikes and therefore, potential conflicts with permittee operations must be considered.

In addition to its content, I disagree with the process by which this rule change has been proposed. Our federal agencies have systems in place for making such decisions. The BLM uses Travel Management Plans and Resource Management Plans among other tools and regulations to guide administrative decisions and management. Furthermore, impacts of proposed changes must be analyzed under the National Environmental Policy Act. This proposed rule change regarding e-bikes has not adhered to any of those procedures and has not undergone an analysis. Therefore BLM cannot know the impacts of the proposed rule.

I appreciate your consideration of my comments and I urge you to not allow e-bikes on non-motorized trails. Please retract this proposed rule change.

Sincerely,

Robyn Cascade