



To: Chief Vicki Christiansen - USDA Forest Service
Deputy Director Dan Smith - National Parks Service
Acting Director(s) William Perry Pendley and Michael Nedd – Bureau Land Management
(Sent via electronic mail)

CC: Andy Tenney - Division Chief, Recreation and Visitor Services, Bureau of Land Management
Michiko Martin - Director, Recreation, Heritage and Volunteer Services USDA Forest Service
Bob Ratcliffe - Division Chief, Conservation and Outdoor Recreation National Park Service

Date: July 26th 2019

Re: E-bike Management on Federal Public Lands

On behalf of our millions of members, supporters and public land users across the country we write to object to any attempt by public land management agencies to legalize electronic motor bikes (e-bikes) on non-motorized trails.

We 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.

We recognize that 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 is ill-advised and would undermine nearly a half century of management precedents and practices. First, allowing e-bikes on non-motorized trails would be un-manageable 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. We 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.

Sincerely,

Addison Oaks Trail Riders
Allegan County Pleasure Riders
American Endurance Ride Conference
American Hiking Society
American Flyers
Appalachian Trail Conservancy
Back Country Horsemen of America (and the 30 BCH states and 196 chapters, full listing at end)
Bay Area Barns and Trails
Blue Ridge Horsemen's Association
Brighton Trail Riders Association
Canalway Partners-Board Member
Carolina Mountain Club

^[1] Class 1 has the smallest motor and battery and a “pedal-assist” engagement system; class 2 has similar motor and batteries sizes but includes a traditional throttle “twist-assist” engagement system; and class 3 has a larger motor and battery size and a pedal engagement system.

^[2] See Executive Orders 11644 and 11989; 43 C.F.R. part 8340; 36 C.F.R. part 212.

Colorado Mountain Club
Colorado Plateau Mountain Bike Trail Assoc, Inc.
Conserving Carolina
Continental Divide Trail Coalition
County Line Riders of Catalina, Inc
Dallas Off Road Bicycle Association (DORBA)
East Mountain Regional Trails Council
Fort Custer Horse Friends Association
Grand Valley Trails Alliance
Greater Yellowstone Coalition
Highlands Plateau Greenway
Ice Age Trail Alliance
Idaho Trails Association
Indiana Trails Community
Ionia Horse Trails Association
Kensington Trail Riders
Maybury Trail Riders
Michigan Horse Council
Michigan Trail Riders Association
Montana Wilderness Association
Montana Backcountry Alliance
National Parks Conservation Association
Natural Resources Council of Maine
Nickel Plate Trail, Inc
North Carolina Horse Council
North Country Trail Association Incorporated
Oregon Equestrian Trails
Oregon Horse Council
Overmountain Victory Trail Association
Pacific Crest Trail Association
Partnership for the National Trails System
Pinckney Trail Riders Association
Pisgah Trailblazers
Pontiac Lake Horseman's Association
Proud Lake Trail Riders
Quiet Trails Group
Rose Oaks Equine Adventurers
San Luis Valley Ecosystem Council
Tri-County Horse Association
The Wilderness Society
Winter Wildlands Alliance

Yankee Springs Trail Riders Association

Full Listing of Back Country Horsemen of America 30 BCH states and 196 chapters:

Back Country Horsemen of Alabama

BCH of Alabama, Central Alabama Chapter
BCH of Alabama, McClennan Chapter
BCH of Alabama, Mississippi /Alabama Chapter
BCH of Alabama, North Eastern Chapter
BCH of Alabama, Warrior Mountain Chapter
BCH of Alabama, Wilderness Chapter

Back Country Horseman of Alaska**Back Country Horsemen of Arizona**

BCH of Arizona, Kingman Chapter
BCH of Arizona, BCH of Central Arizona
BCH of Arizona, East Valley BCH

Back Country Horsemen of Arkansas

BCH of Arkansas, Ozark Chapter
BCH of Arkansas, Buffalo River Chapter
BCH of Arkansas, Lower Buffalo River Chapter

Backcountry Horsemen of California

BCH of California, Antelope Valley Unit
BCH of California, Eastern Sierra Unit
BCH of California, High Country Unit
BCH of California, High Sierra Unit
BCH of California, Kern River Valley Unit
BCH of California, Kern Sierra Unit
BCH of California, Lake Mendocino Unit
BCH of California, Los Padres Unit
BCH of California, Mid Valley Unit
BCH of California, Mother Lode Unit
BCH of California, North Bay Unit
BCH of California Pacific Crest Unit
BCH of California, Redshank Riders Unit
BCH of California, Redwood Unit
BCH of California, San Diego Unit
BCH of California, San Joaquin Sierra Unit
BCH of California, Santa Ana River Unit
BCH of California, Sequoia Unit
BCH of California, Shasta-Trinity Unit
BCH of California, Sierra Freepackers Unit
BCH of California, Sutter Buttes Unit
BCH of California, Top of the State Unit

Back Country Horsemen of Colorado

BCH of Colorado, Four Corners BCH
BCH of Colorado, Front Range BCH
BCH of Colorado, Grand Mesa BCH
BCH of Colorado, Mesa Verde BCH
BCH of Colorado, Northern Colorado BCH
BCH of Colorado, Rocky Mountain BCH
BCH of Colorado, San Juan BCH
BCH of Colorado, Trail Wise BCH

Back Country Horsemen of Florida

BCH of Florida, BCH Southeast Ocala Forest
BCH of Florida, Florida Forever BCH
BCH of Florida, Nature Coast BCH
BCH of Florida, Suwannee Valley BCH
BCH of Florida, Sarasota BCH
BCH of Florida, BCH First Coast

Back Country Horsemen of Georgia

BCH of Georgia, BCH of Middle and South Georgia
BCH of Georgia, BCH of North Georgia
BCH of Georgia, BCH of Northeast Georgia
BCH of Georgia, BCH of Northwest Georgia

Back Country Horsemen of Idaho

BCH of Idaho, BCH of North Central Idaho
BCH of Idaho, Boise BCH
BCH of Idaho, Cache Peak BCH
BCH of Idaho, Eagle Rock BCH
BCH of Idaho, Heartland BCH
BCH of Idaho, High Desert BCH
BCH of Idaho, Palouse BCH
BCH of Idaho, Panhandle BCH
BCH of Idaho, Portneuf River BCH
BCH of Idaho, Priest River Valley BCH
BCH of Idaho, Salmon River BCH
BCH of Idaho, Sawtooth BCH
BCH of Idaho, Selkirk Valley BCH
BCH of Idaho, Squaw Butte BCH
BCH of Idaho, Treasure Valley BCH
BCH of Idaho, Twin Rivers BCH

Back Country Horsemen of Illinois**Back Country Horsemen of Indiana, Hoosier BCH****Back Country Horsemen of Iowa**

BCH of Iowa, South East Chapter
BCH of Iowa, Mid Iowa Chapter
BCH of Iowa, South West Iowa Chapter
BCH of Iowa, Western Iowa Chapter

Back Country Horsemen of Kansas

BCH of Kansas, Sunflower Chapter
BCH of Kansas, Saddle Ridge Chapter

Back Country Horsemen of Kentucky

BCH of Kentucky, Fort Harrod Kentucky BCH
BCH of Kentucky, Green River BCH
BCH of Kentucky, Land Between the Lakes BCH
BCH of Kentucky, Mammoth Cave BCH
BCH of Kentucky, Mountain Lake BCH

Back Country Horsemen of Michigan, Pigeon River and Beyond**Back Country Horsemen of Minnesota**

BCH of Minnesota, Zumbro Bottoms Chapter

Back Country Horsemen of Missouri

BCH of Missouri, Brownfield Chapter
BCH of Missouri, Cuivre River Chapter
BCH of Missouri, Heartland Chapter
BCH of Missouri, Indian Trails Chapter
BCH of Missouri, Mountain Riders Chapter
BCH of Missouri, Northeast Missouri Chapter
BCH of Missouri, Ridge Runner Chapter
BCH of Missouri, River Springs Chapter
BCH of Missouri, South Central Chapter
BCH of Missouri, Tornado Ridge Chapter
BCH of Missouri, Trail's End Chapter
BCH of Missouri, Tri Lakes Chapter

Back Country Horsemen of Montana

BCH of Montana, Bitter Root BCH
BCH of Montana, Beartooth BCH
BCH of Montana, Cabinet BCH
BCH of Montana, Charlie Russell BCH
BCH of Montana, East Slope
BCH of Montana, Flathead BCH
BCH of Montana, Gallatin Valley BCH
BCH of Montana, Judith Basin BCH
BCH of Montana, Last Chance BCH
BCH of Montana, Mile High BCH
BCH of Montana, Mission Valley BCH
BCH of Montana, Missoula BCH
BCH of Montana, Northwest BCH
BCH of Montana, Selway-Pintler Wilderness BCH
BCH of Montana, Three Rivers BCH
BCH of Montana, Upper Clark Fork BCH
BCH of Montana, Wild Horse Plains BCH

Back Country Horsemen of Nevada

BCH of Nevada, Bristlecone Chapter
BCH of Nevada, Carson Valley Chapter
BCH of Nevada, High Desert Chapter
BCH of Nevada, High Sierra Chapter

Back Country Horsemen of New Mexico

BCH of New Mexico, Gila Chapter
BCH of New Mexico, Lower Rio Grande Chapter
BCH of New Mexico, Northwest Chapter
BCH of New Mexico, Pecos Chapter
BCH of New Mexico, Santa Fe Chapter
BCH of New Mexico, Socorro Chapter
BCH of New Mexico, Three Rivers Chapter
BCH of New Mexico, Zuni Mountain Chapter

Back Country Horsemen of New York**Back Country Horsemen of North Carolina**

BCH of North Carolina, Big Creek Chapter

BCH of North Carolina, Blue Ridge Chapter
BCH of North Carolina, Croatan Chapter
BCH of North Carolina, Pisgah Ranger District Chapter
BCH of North Carolina, Uwharrie National Forest Chapter

Back Country Horsemen of North Dakota

Back Country Horsemen of Oregon

BCH of Oregon, Columbia Gorge Chapter
BCH of Oregon, East Cascades Chapter
BCH of Oregon, Emerald Empire Chapter
BCH of Oregon, High Country Wilderness Packers Chapter
BCH of Oregon, High Desert Trail Riders
BCH of Oregon, Sourdough BCH
BCH of Oregon, Steens BCH
BCH of Oregon, Territorial Riders
BCH of Oregon, West Cascades BCH

Back Country Horsemen of South Dakota, Black Hills Backcountry Horsemen

Back Country Horsemen of Tennessee

BCH of Tennessee, BCH of Cumberland Plateau
BCH of Tennessee, BCH of East Tennessee
BCH of Tennessee, Big South Fork
BCH of Tennessee, Middle TN BCH
BCH of Tennessee, Southern Appalachian BCH

Back Country Horsemen of Utah

BCH of Utah, Bridgerland Chapter
BCH of Utah, Canyon Lands Chapter
BCH of Utah, Hi-Lines & Hobbles Chapter
BCH of Utah, High Desert Chapter
BCH of Utah, High Uinta Chapter
BCH of Utah, Mountain Ridge Chapter
BCH of Utah, San Rafael Chapter
BCH of Utah, Southwest Chapter
BCH of Utah, Uinta Basin Chapter
BCH of Utah, Wasatch Front Chapter

Back Country Horsemen of Virginia

BCH of Virginia, BCH of the Virginia Highlands
BCH of Virginia, Eastern Divide Chapter
BCH of Virginia, Golden Horseshoe BCH
BCH of Virginia, Southwest Virginia Chapter

Back Country Horsemen of Washington

BCH of Washington, Capitol Riders
BCH of Washington, Cascade Horse Club Chapter
BCH of Washington, Crab Creek Riders Chapter
BCH of Washington, Ferry County Chapter
BCH of Washington, Grays Harbor Chapter
BCH of Washington, Inland Empire Chapter
BCH of Washington, Island County Chapter
BCH of Washington, Lewis County Chapter
BCH of Washington, Methow Valley Chapter

BCH of Washington, Mount Adams Chapter
BCH of Washington, Mount St. Helens Chapter
BCH of Washington, Mt Olympus Chapter
BCH of Washington, Nisqually Chapter
BCH of Washington, Northeast Chapter
BCH of Washington, Oakland Bay Chapter
BCH of Washington, Okanogan Valley Chapter
BCH of Washington, Olympic Chapter
BCH of Washington, Peninsula Chapter
BCH of Washington, Pierce County Chapter
BCH of Washington, Ponderosa Chapter
BCH of Washington, Purple Sage Riders
BCH of Washington, Rattlesnake Ridge Riders
BCH of Washington, Scatter Creek Riders
BCH of Washington, Skagit Chapter
BCH of Washington, Tahoma Chapter
BCH of Washington, Traildusters Chapter
BCH of Washington, Wenas Valley Chapter
BCH of Washington, Wenatchee Valley Chapter
BCH of Washington, Whatcom Chapter
BCH of Washington, Willapa Hills Chapter
BCH of Washington, Yakima Valley Chapter

Back Country Horsemen of Wisconsin

BCH of Wisconsin, Zumbro Bottoms BCH
BCH of Wisconsin, Southeast Chapter

Back Country Horsemen of Wyoming

BCH of Wyoming, Great Divide Chapter
BCH of Wyoming, Mountain Man Chapter
BCH of Wyoming, Pathfinder Chapter
BCH of Wyoming, Shoshone Chapter
BCH of Wyoming, Teton Chapter
BCH of Wyoming, Wind River Chapter
BCH of Wyoming, Cloud Peak Chapter
