



**IDAHO DEPARTMENT OF FISH AND GAME**

600 S Walnut / P.O. Box 25  
Boise, Idaho 83707

Brad Little / Governor  
Ed Schriever / Director

October 22, 2020

Director, Recreation Staff  
USDA Forest Service  
1400 Independence Avenue SW  
Washington, DC 20250-1124

Re: Proposed Forest Service Directives — Updates to FSM 7700 and 7710 E-bikes

The Idaho Department of Fish and Game's (IDFG) mission is to preserve, protect, perpetuate, and manage fish and wildlife for the public interest (Idaho Code 36-103(a)). Accordingly, IDFG has reviewed the United States Forest Service (USFS) proposed updates to Forest Service Manuals (FSM) 7700 and 7710 in regards to electric bikes (e-bikes). The USFS's updates to FSM 7700 and 7710 are intended to clarify guidance about e-bike use and management on National Forest System (NFS) lands.

IDFG supports increasing recreational access on public lands if adverse effects to fish and wildlife and associated recreation (i.e., hunting, fishing, and trapping) can be avoided, minimized, or mitigated. IDFG therefore recommends that the USFS consider the following technical comments when considering updates to the FSMs in regards to e-bikes and subsequent analyses of potential effects from e-bike ridership:

1. Fish and Wildlife Resources – Although few studies are currently available (see MacArthur et al. 2014, Scholten et al. 2018), e-bikes logically have effects on fish and wildlife that are more similar to motorized off-road vehicles (i.e., ATV, UTV, SxS) than bicycles (i.e., mountain bikes) and could increase overall recreational use of areas which previously only allowed non-motorized access. The following examples illustrate potential fish and wildlife issues to address when considering e-bikes:
  - Decreased big game security from growing demands for year-round motorized (e.g., e-bikes) and non-motorized recreation on Idaho's public lands (see IDFG big game management plans: <https://idfg.idaho.gov/wildlife/management-plans>).
  - Habitat compression and displacement (i.e., a functional reduction of habitat availability) from big game avoiding recreation trails with increased ridership from e-bikes, noting that mountain biking can displace elk more than hiking and horseback riding (see Wisdom et al., 2000, Rowland et al., 2004, Frair et al., 2008, Buchanan et al., 2014, Prokopenko et al., 2016, Wisdom et al., 2018).
  - Increased incidents of dangerous encounters between cyclists and big game (particularly bears) with increased ridership from e-bikes, because the quiet and fast rate of travel can make cyclists prone to close wildlife encounters (see Herrero 1989, Schmor 1999, Herrero and Herrero 2000).

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2. **Hunting, Fishing, and Trapping** – Maintaining fish and wildlife recreational opportunities are critical to Idaho's economy and heritage, and e-bikes could modify these opportunities in areas which previously only allowed non-motorized access. The following examples illustrate potential recreational issues to address when considering e-bikes:
  - Reduced hunting opportunity from increased recreation by e-bikes that alters big game security, vulnerability, and distribution (e.g., elk exposed to mountain bikes increased travel and alert/flight responses and decreased time feeding; Naylor et al. 2009, Proffitt et al., 2013).
  - Loss of access to non-motorized settings for hunting, fishing, and trapping.
3. **Regulatory Compliance and Enforcement** – E-bikes are currently considered motorized vehicles (equipped with electric motors) and prohibited on designated non-motorized routes by the USFS and IDFG. E-bikes are also considered motorized vehicles per Idaho Code 36-202(y) and regulated per Idaho's Motorized Hunting Rule (IDAPA Rule 13.01.08.411), which restricts motorized vehicle use for hunting in some areas to manage big game vulnerability. Therefore, it is important that the USFS evaluates the potential for divergent cross-jurisdictional definitions to cause recreationist confusion and thereby adversely affect e-bike regulatory compliance and enforcement.
4. **Designation of E-bike Use on Trails** – Due to recent and rapid innovations in e-bike technology and lack of scientific information that fully analyzes effects of e-bikes on fish and wildlife resources, caution should be used when considering a programmatic approach to designate e-bike use of USFS trails. Proposed updates to the FSM (7715.5, 4c), suggest a Programmatic Environmental Analysis to designate e-bike trail use due to similarities in effects between e-bikes and bicycles. Because of the variety of site specific factors that could produce varying effects from e-bikes, a programmatic approach may not be appropriate for all sites and trails. It is likely that effects will differ among, but not limited to, the following: wildlife species, seasonality, area of use (vegetation, topography, etc.), trail type, previous trail use (both type and amount of use), and reason for prior trail designation. It is important that these factors, and potentially others, be considered when designating e-bike trail use. Furthermore, the assumed similarity of effects between e-bikes and bicycles should be scientifically tested.

For questions or additional information, please contact Frank Edelmann, Natural Resource Policy Manager at (208) 287-2756.

Sincerely



Ed Schriever  
Director

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