Director's Office
PO Box 200701
Helena, MT 59620-0701
(406) 444-3186
Fax (406) 444-4952
Ref: DO195-20
October 26, 2020

Director, Recreation Staff
U.S. Forest Service
1400 Independence Avenue SW
Washington, DC 20250-1124

Re: Updating and Clarifying Guidance on the Management of Electric Bicycle (e-bike) Use on National Forest System (NFS) Lands

To Whom It May Concern:

One of the goals in Montana's State Comprehensive Outdoor Recreation Plan (SCORP) is to "enhance public access to outdoor recreation resources and facilities." Offering opportunities outside is one of the pillars of Montana Fish, Wildlife and Parks (FWP); inclusion and scientific integrity are others. Being inclusive of e-bikes on non-motorized routes challenges contemporary science clearly showing that more use impacts wildlife. These and other impacts need to be well considered in this balance.

There is little doubt that electric bicycles (e-bikes) make recreating outdoors more accessible for individuals with limited mobility. While the expansion of e-bike use could increase recreational opportunities for some members of the public, many other members of the public value their *current* recreational opportunities on National Forest System (NFS) land routes in relatively less-used areas that deliberately limit motorized use through exhaustive travel planning efforts. For these users, many of the opportunities they have advocated for and enjoy will decline – in many cases with no comparable alternative option. At the same time, there is already a wide array of surfaces on multiple landownerships currently available for e-bikes within existing opportunities. With the proposed change, all this would happen not with comprehensive review of existing travel plans considering new e-bike technology and its related impacts, but with an arbitrary decision that places cutting-edge e-bikes in the same category as hiking on foot.

FWP is not currently opposed to e-bike use on existing motorized roads and trails, given these vehicles represent a type of motorized travel. This said, we encourage U.S. Forest Service (USFS) staff to engage state fish and wildlife agencies in a discussion regarding potential impacts to wildlife or conflicts with wildlife or other users from this new technology that could change the amount, timing, and type of uses on these motorized routes. Recreation managers and fish, wildlife, and land stewards need to be cognizant of public safety concerns, risks, and hazards associated with e-bikes. As an example, the speed and quiet of e-bikes coupled with short sight distances has potential to increase the number of close range and

potentially lethal encounters with federally listed grizzly bears. This negative potential is further enhanced by the range of e-bikes, bringing more people into more areas.

FWP is concerned that allowing e-bikes on non-motorized trails will further impact wildlife security. If e-bikes are allowed on non-motorized trails, this will allow humans to travel longer and farther into habitat that otherwise would not likely see as much human impact. A growing body of evidence confirms wildlife that use areas relatively distant from motorized routes can be displaced even by non-motorized humans when they occur at high use levels or frequencies. Because e-bikes represent more humans in areas currently closed to motorized use, they represent more wildlife disturbance, displacement, and reduced wildlife use of public habitats. This is especially detrimental in areas where habitat security is already at a minimum or where sensitive wildlife species, including federally listed wildlife, are present. In some cases, wildlife may be redistributed off public lands deliberately managed for the presence of wildlife to less busy private lands unavailable or restricted for public recreation. This can result in increased wildlife damage to private property and another type of lost public wildlife-related opportunities on public lands. Whether through increased disturbance, displacement to other areas, or more frequent conflicts between e-bike users and wildlife, the promotion of e-bike use on NFS lands has the potential to reduce overall habitat effectiveness across large landscapes of critical wildlife habitat. The evidence behind this concern includes numerous studies confirming that human disturbance often causes negative impacts to wildlife, especially big game during winter and birthing periods. Additionally, e-bikes are already being used in hunting and FWP anticipates that use will increase. Use of e-bikes for hunting in areas closed to motorized access will reduce the security provided to game species in these areas. In addition to impacts to hunting opportunities for the public, this could have consequences for game populations, their distribution, and their effective management. There is large body of literature (see citation examples below) that indicates motorized access negatively impacts wildlife habitat security for not only actively hunted big game species such as elk and mule deer but also federally listed grizzly bears.

FWP also has concerns about the USFS establishing "promotion of e-bike use on NFS lands as an objective" as this could lead to more alienation of existing users and further proliferation of motorized routes on NFS lands and user-created trails, which is an increasing problem across many national forests. Additionally, as technology continues to improve and expand, e-bikes likely will see dramatic technological improvements. The guidance on e-bike use on NFS lands needs to be adaptable to changes, such as increased power and speed, to manage e-bike use appropriately.

FWP recognizes the challenge for public land management agencies to offer a diversity of opportunities for a diverse public. However, this challenge should not be met by arbitrary definitions of types of use. An e-bike meets the definition of "Motor Vehicle" as defined in the Forest Service Manual (FSM) Chapter 7700 and should therefore be restricted to existing motorized routes. They represent motorized use and should be treated as such. Therefore, FWP recommends caution when considering the use of e-bikes on NFS land routes not currently open to motorized travel. The justification for this caution is grounded in that the electric motor on these bikes reduces physical demand, thus increasing the number of persons traveling these routes into areas where previous management resulted in fewer human visitors. It is also grounded on the fact that electric motors assisting any mode of transportation *is* motorized use.

We encourage the USFS to work with other agencies to develop e-bike policies. In Montana this would include at a minimum: FWP, the Department of Natural Resources and Conservation, and the Department of Transportation.

FWP would be opposed to allowing e-bike use on non-motorized trails across all NFS lands without close consultation with state fish and wildlife agencies. If you have any questions, please contact Deb O'Neill at (406) 444-3755 or doneill@mt.gov. Thank you for the opportunity to comment.

Sincerely,

Martha Williams
Director

Selected literature citations related to impacts of motorized recreation (from a large body of literature) and mountain bikes on wildlife, particularly elk:

McCorquodale, S. M. 2013. A brief review of the scientific literature on elk, roads, and traffic. Washington Department of Fish and Wildlife, Olympia, USA.

Naidoo, Robin, and A. Cole Burton. Relative Effects of Recreational Activities on a Temperate Terrestrial Wildlife Assemblage. Conservation Science and Practice, 2020, e271. https://doi.org/10.1111/csp2.271.

Naylor, Leslie M., M. J. Wisdom, and R. G. Anthony. 2009. Behavioral responses of North American elk to recreational activity. Journal of Wildlife Management 73: 328-338.

Ranglack, Dustin H., K. M. Proffitt, J. E. Canfield, J. A. Gude, J. Rotella, and R. A. Garrott. 2017. Security areas for elk during archery and rifle hunting seasons. Journal of Wildlife Management 81: 778-791.

Scholten, Janneke, Stein R. Moe, and Stein Joar Hegland. Red Deer (Cervus Elaphus) Avoid Mountain Biking Trails. European Journal of Wildlife Research 64, no. 1 (February 2018): 8. https://doi.org/10.1007/s10344-018-1169-y.

Wisdom, M. J., H. K. Preisler, N. J. Cimon, B. K. Johnson. 2004. Effects of Off-Road Recreation on Mule Deer and Elk. Transactions of the North American Wildlife and Natural Resource Conference 69: 67-80.

Wisdom, Michael J., Haiganoush K. Preisler, Leslie M. Naylor, Robert G. Anthony, Bruce K. Johnson, and Mary M. Rowland. Elk Responses to Trail-Based Recreation on Public Forests. Forest Ecology and Management 411 (March 1, 2018): 223–33. https://doi.org/10.1016/j.foreco.2018.01.032.