Data Submitted (UTC 11): 10/2/2020 10:17:40 PM
First name: Anne
Last name: Millbrooke
Organization:
Title:
Comments: As a birder, hiker, camper, wildlife viewer, citizen appreciating clean air and clean water, I oppose the expansion of ebike access to trails on public lands. I need to say that, say that publicly, and keep repeating it because the Bureau of Land Management, Bureau of Reclamation, Fish and Wildlife Service, and National Park Service all propose to open trails in general to ebikes. This is politics, but not politics as usual because the national policy since Teddy Roosevelt was president has been conservation, and conservation is Forest Service policy by law still. This is an effort to undermine that law, and I oppose it strongly!

It is not safe for people to amble, walk, or hike on many trails also used by bikers; even non-motorized mountain bikes endanger the traveler on foot. The disruption to birds is particularly problematic given the crash in bird population since 1970 as documented by Ken Rosenberg et al. in 2019. The baseline was already too low; for example, there was an even greater decline in total bird population in the late 19th century, as reported by William Hornaday in 1898.

Birds should have some place to migrate, feed, nest, and roost without mechanical interference, especially without motorized interference.

Public lands are held in trust for the people of the nation. Birds are public wildlife. Public lands and public birds, and other public resources (fish, wildlife, insects, watersheds, carbon storage capability of nature, etc.) should be conserved. These resources are for the benefit of future generations as well as our own. They should not be degraded by motorized recreationists. As the ecologist George Wuerthner keeps reminding us, "Recreation is not conservation." Moreover, restricting the expansion of trails open to ebikes in no way diminishes or interferes with the thousands of miles trails already open to ebikes. The Forest Service should not use "recreation" as a euphemism for mechanized recreation, which studies have shown are predominantly the leisure of white males 20-55 years old. The public lands are for all the public.

Mechanized recreation degrades the environment more than non-mechanized recreation, and motorized recreation degrades the environment more than non-motorized recreation. The scientific literature is clear on these points; for examples, see Wuerthner, 2019; Courtney Larson et al., 2016; Catherine Pickering et al., 2010; Mosedale, 2003; Wilson and Seney, 1994; Tucker, and Michael Vandeman, 2004.

Back in the 1960s Edward Abbey proposed an end to road construction in national parks and the reservation of dirt roads for use by only non-motorized traffic. Applying that guidance to public lands in general makes a lot of sense given the population pressures added since then. In no way should we be opening footpaths, some already shared with mountain bikers, to motorized traffic!

Forester Elers Koch wrote in the 1930s, "Roads are such final and irretrievable facts." Motorized traffic makes any path a road unsafe for pedestrians and disruptive to birds and other wildlife. Don't allow ebikes to degrade any more trails through our public lands. The Land and Conservation Fund provides for lands for recreation. We don't need to degrade the remaining wildness of our public lands.

Block the general expansion of trails open for ebike use.

All mechanized vehicles, particularly motorized vehicles - whether electric, gas, diesel, the type of fuel doesn't matter - all mechanized and particularly motorized vehicles erode soil, compact the ground of a path into essentially a road, increase sedimentation in runoff, damage watersheds, transport invasive species, disturb native wildlife, severe wildlife corridors, and damage the public lands.

Sincerely,
Anne Millbrooke

Citizen
Past President, Sacajawea Audubon Society, Bozeman, MT

Sources cited:

Edward Abbey, Desert Solitaire: A Season in the Wilderness. New York: Ballantine Books, 1968.

William T. Hornaday, "The Destruction of our Birds and Mammals," Second Annual Report of the New York Zoological Society (New York: New York Zoological Society, 1898), 77-130.

Elers Koch, "The Passing of the Lolo Trail," Journal of Forestry, 33/2 (1935): 98-104.

Courtney L. Larson, Sarah E. Reed, Adina M. Merenlender, and Kevin R. Crooks, "Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review," PLOS ONE (December 08, 2016), 21p, doi:10.1371/journal.pone.0167529.

Jan Mosedale, "Planning for Appropriate Recreation Activities In Mountain Environments: Mountain Biking in the Canadian Rocky Mountains," 5 FES Outstanding Graduate Student Paper Series, 7/5 (January 2003), https://yorkspace.library.yorku.ca/xmlui/bitstream/handle/10315/18106/jan-mosedale.pdf?sequence=1&isAllowed=y

Catherine Marina Pickering, Wendy Hill, David Newsome, and Yu-Fai Leung, "Comparing Hiking, Mountain Biking and Horse Riding Impacts on Vegetation and Soils in Australia and the United States," Journal of Environmental Management, 92 (2010), 551562.

Kenneth V. Rosenberg, Adriaan M. Dokter, Peter J. Blancher, John R. Sauer, Adam C. Smith, Paul A. Smith, Jessica C. Stanton, Arvind Panjabi, Laura Helft, Michael Parr, Peter P. Marra, "Decline of the North American Avifauna", Science, (September 19, 2019). 120-124, doi:10.1126/science.aaw1313.

Michael J. Vandeman, "The Impacts of Mountain Biking on Wildlife and People: A Review of the Literature," Culture Change (July 03, 2004), http://culturechange.org/mountain_biking_impacts.htm

John P. Wilson and Joseph P. Seney, "Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana," Mountain Research and Development, 14/1 (February 1994, 77-88.

George Wuerthner, "Impacts of Mountain Biking," The Wildlife News, June 18, 2019, https://www.thewildlifenews.com/2019/06/18/impacts-of-mountain-biking/

George Wuerthner, Thrillcraft: The Environmental Consequences of Motorized Recreation. Sausalito, CA: Foundation for Deep Ecology, 2007.