



June 5, 2020

RE: FWS-HQ-NWRS-2019-0109, National Wildlife Refuge System: Use of Electric Bicycles

To Whom It May Concern:

I am writing on behalf of the Safe Trails Coalition regarding the proposed rule FWS-HQ-NWRS-2019-0109, National Wildlife Refuge System: Use of Electric Bicycles released by Department of the Interior (DOI) for a rule change allowing e-bikes on US Fish and Wildlife Service (USFWS) lands.

By way of background, the Safe Trails Coalition was formed eight years ago by several organizations including Audubon California, Friends of Harbors, Beaches and Parks, Sea and Sage Audubon, and Sierra Club. Collectively and along with our more than 30 supporting organizations, our focus is to find the balance between recreational needs and resource protection in our parks, preserves, and natural lands.

According to the National Wildlife Refuge website: "The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management and, where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans." And, as the nation's oldest conservation entity charged with protecting our plants and animals—especially the threatened and endangered species—we are surprised an expansion of recreational use is proposed to occur on wildlife refuges and wetland management areas.

We are disheartened to read about the proposed allowed use of electronic bikes (e-bikes) within NPS lands—especially since their environmental impacts have not been studied. Our concerns stem from our individual and collective knowledge, use of parklands, and research related to trails and trail use locally, regionally, statewide, and nationally. E-bikes are not traditional bicycles, they are motorized and should be treated as motorized vehicles. In short, we believe e-bikes should only be allowed on roads and trails that motor vehicles are allowed on.

Key issues include:

- **Speed.** E-bikes and their technologies are constantly advancing and presently, manufacturers are able to have e-bikes reach speeds of up to 55 miles per hour. This

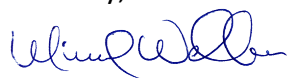
type of speed is difficult to enforce with limited staff, likely staff is unable to reach those same speeds in their vehicle on a trail, and high speeds are reckless and jeopardize the safety of other trail users.

- **Distance.** E-bikes are able to travel further into wilderness areas and consequently impact trails that haven't seen such a dramatic increase in intense use. Trail compaction, erosion, cutting, and expansion, coupled with impacts to the plants and animals in these more remote locations will be exceedingly difficult to undue. Remote locations have typically been restricted to only those on foot to reduce the impacts and maintain a wilderness setting.
- **Location Expansion.** Even regular mountain bikes are restricted to specific areas due to the isolated, sensitive, and minimal human use of wilderness areas. As the use of e-bikes increases, and the request for additional riding locations increases, our wilderness areas will be targeted next. This slow opening of wilderness locations will eventually lead to a permanent erosion of the fundamental purpose of those wild places.
- **Increased Impacts.** More and more people are venturing into our wild areas, which is wonderful for positive nature-based experiences. However, existing impacts from trail users is already harmful to the environment. Trash, unauthorized trail use, trail cutting, and social trails already impact our natural lands. With increased and intensive access, those effects will increase as well. The addition of e-bikes further strains what is an already compromised situation.
- **Safety Risks.** Many individuals with reduce physical capabilities are using e-bikes to enjoy recreation once again. Because e-bikes can travel farther and at higher speeds, if a rider encounters an issue (especially if they have a physical disability), they are less likely to be able to solve it remotely and will need to utilize Search and Rescue teams for extraction. Further, e-bikes also have started wildfires and in fire-prone areas and this is of significant concern.

In conclusion, we acknowledge that all forms of recreation have impacts, but because of motor powered assistance, e-bikes can travel further, go faster, and impact a greater area in significantly less time than a hiker, equestrian or traditional bicyclist. Consequently, we oppose this rule change and urge your reconsideration.

We appreciate your attention to this important issue.

Sincerely,



Michael Wellborn
Safe Trails Coalition