

June 8, 2020

John Calhoun
Chief, Division of Jurisdiction, Regulations, and Special Park Uses
National Park Service

Re: Electric Bicycles – Proposed Rule; Docket ID: NPS-2020-0001; RIN: 1024-AE61

Sent via: <https://beta.regulations.gov/comment/NPS-2020-0001-0001>

Dear Mr. Calhoun,

Wilderness Watch submits these comments on the above-referenced Proposed Rule (“the proposal”). Wilderness Watch is a national nonprofit wilderness conservation organization headquartered in Missoula, Montana with satellite offices in Idaho and Minnesota, chapters in Alaska, Wyoming, and Georgia, and members in virtually every state. Wilderness Watch is America’s leading organization dedicated to defending and keeping wild the nation’s 111 million-acre National Wilderness Preservation System (NWPS).

Wilderness Watch focuses on the preservation and proper stewardship of lands and rivers included in the NWPS. Wilderness Watch has worked on issues affecting 40 of 61 national park wilderness units stretching from the Marjory Stoneman Douglas Wilderness in Everglades National Park in Florida, to the Otis Pike Fire Island High Dune Wilderness in New York, to Gates of the Arctic Wilderness in Alaska, to Death Valley Wilderness in California. Wilderness Watch has also provided public input on National Park Service General Management Policies and Director’s Orders that affect all congressionally-designated wilderness within the parks.

Wilderness Watch endorses the comment letter submitted by Public Employees for Environmental Responsibility, filed on Friday, June 5, 2020. Wilderness Watch attaches and incorporates that letter by reference. In addition to the concerns raised in the attached, Wilderness Watch raises additional concerns pertaining more specifically to effects on designated Wilderness, proposed wilderness, and recommended wilderness.

Additional Comments:

The Proposed Rule will lead to illegal trespass, wilderness degradation, and displacement of wildlife in designated Wilderness and in wilderness-suitable lands.

Because there is almost no enforcement now for trespass, illegal off-trail riding, and illegal trail development by some bikers, e-bikes will increasingly trespass into Wilderness and other

protected areas with no consequences. This illegal use will degrade the wild character of these lands and should not be permitted.

Bicycles threaten Wilderness, proposed wilderness, and recommended wilderness within the national park system. Motorized and mechanical transport within Wilderness is prohibited by the Wilderness Act, 16 U.S.C. 1133(c), but Wilderness Watch staff have personally discovered bicycle tracks where bicyclists have unlawfully trespassed in several Wildernesses, included the Cumberland Island Wilderness in the Cumberland Island National Seashore. E-bikes pose an even greater risk than conventional bikes because their riders can go farther and faster, and riders likely know there is little chance of being caught.

Compounding this problem, backcountry and Wilderness ranger positions are increasingly defunded, so there is little enforcement on the ground. All bicycles are banned in Wilderness, but distinguishing between non-motorized, human-powered bicycles and electric bikes outside of Wilderness is rapidly becoming impossible as advancing technology behind electric bicycles make them virtually indistinguishable from other bikes. See, as one example:

<https://www.youtube.com/watch?v=5cnUai7hNSs&feature=youtu.be>

Wilderness Watch also has concerns over displacement of wildlife in areas that were previously less visited by humans. Electric bicycle access will allow more people to more easily access areas favored by wildlife. Multiple studies have demonstrated the negative impacts of increased human presence on wildlife. See, as one example: https://www.skyhnews.com/news/elk-herd-population-plummets-in-aspen-vail-areas-as-human-use-grows/?utm_campaign=2020-02-03+WildNews&utm_medium=email&utm_source=Pew. These impacts must be seriously considered.

Additionally, our staff and members have extensive experience hiking in bear country, including grizzly country, and are familiar with the safety guidelines for travelling in such areas. Biking on trails in grizzly country presents particular danger because of the speed involved and the potential to surprise bears. In Montana, mountain bikers, who are often travelling faster and quieter than those on foot, have been seriously mauled and killed by bears after surprise encounters on bikes. See, as examples:

- <https://mountainjournal.org/scientists-say-mountain-biking-negatively-impacts-bears>
- <https://www.explorebigsky.com/mountain-biker-stable-after-big-sky-grizzly-bear-attack/34514>
- <https://www.greatfallsribune.com/story/news/local/2017/03/06/bike-collision-grizzly-determined-cause-fatal-encounter/98818710/>

E-bikes, because they travel faster than non-motorized bikes exacerbate the risk to both riders and bears.

When Wilderness Watch members hike in national parks, a significant part of the motivation is to escape the sights and sounds of modern technology and development. Wilderness Watch members also enjoy watching wildlife in these areas. Wilderness Watch is concerned that traditionally non-motorized trails will become much more popular to e-bike riders than they have

been to conventional cyclists, due to the distance one has to ride on roads to reach the trailhead. E-bikes will greatly reduce enjoyment of these trails for non-motorized users and will displace wildlife and degrade wildlife habitat by increasing human presence in areas that were previously less visited.

In sum, the NPS should withdraw the Proposed Rule and correct the numerous serious deficiencies detailed above. Please feel free to contact me if you have questions.

Sincerely,

Kevin Proescholdt
Conservation Director