



**BACKCOUNTRY
HUNTERS & ANGLERS**

**P.O. BOX 9257
MISSOULA, MT 59807
406.926.1908**

U.S. Forest Service
Deschutes National Forest

Re: Proposal to authorize the use of class 1, pedal-assist e-bikes on 161.4 miles of previously non-motorized trail within the Sisters and Bend – Fort Rock Ranger Districts of the Deschutes National Forest.

Petition:

Our ability to hunt and fish is intrinsically linked to the preservation of habitat. The profound connection we experience while hunting in the backcountry or fishing on remote rivers fosters a deep respect for conservation. Protecting non-motorized areas is vital to maintaining these unique experiences for future generations. In a world increasingly encroached upon by development and motorized recreation, it is imperative to defend these wild lands from motorized intrusion to preserve the authentic connection to nature that defines our outdoor heritage. By safeguarding unfragmented habitats, we ensure that the freedom, challenge, and solitude of true backcountry hunting and fishing remain available for all to enjoy.

With that, Backcountry Hunters & Anglers stands firmly opposed to motorized use in designated non-motorized areas and the proposal to authorize the use of class 1, pedal-assist e-bikes on 161.4 miles of non-motorized trail within the Sisters and Bend - Fort Rock Ranger Districts of the Deschutes National Forest. These areas, set aside for their wild qualities and the opportunity they provide for solitude, are vital for the conservation of our natural landscapes and wildlife habitats. As stewards of the backcountry, we believe that maintaining the integrity of nonmotorized areas is essential for ensuring that future generations can experience the same unspoiled beauty and tranquility that we enjoy today. Motorized vehicles disrupt wildlife and erode the wild character that these areas are meant to offer.

We are particularly concerned about illegal user-created routes not being adequately addressed. This remains one of the most concerning issues for state wildlife management agencies as they address impacts to ungulate populations in particular. Guidance should address unauthorized user-created routes more directly, as well as concerning trends over the years from some in the biking community to leverage these into authorized use. The following excerpt from Bend Magazine illuminates the issue perfectly when reporting on the history of the Phil's Trail Complex, one of the proposed locations for e-bike use:

In 1984, Bob Woodward--who would later become a mayor of Bend--came upon a deer trail through a canyon, and he and his friend Phil Meglasson began making "improvements...Back then, the U.S. Forest Service said you could ride your bike anywhere you wanted in the forest. So if you just rode the same way four or five times, you'd have yourself a trail," he said. "We didn't use tools. We just rode our bikes through the woods. At that point there were so few people around that the Forest Service didn't really care."

Monitoring and enforcement policies are conspicuously lacking in this proposal for establishing priorities for investing resources to monitor impacts on the national forests in addition to enforcing illegal use. Due to the overlap with Tumalo Winter Range Habitat, Priority Wildlife Connectivity Areas, and Key Elk Habitat Areas, coupled with the lack of data provided by the Forest Service on existing impacts to ungulates and other wildlife, it is imperative that the Forest Service provides more information and analysis before



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moving ahead. Based on our understanding of the draft Environmental Assessment and the concerns highlighted in this letter, as well as the detailed analysis provided by BHA in their comment letter, we believe that the completion of a full Environmental Impact Statement should be performed before a final decision is made.