



Protecting Marin Since 1934

September 20, 2019

General Superintendent Laura Joss
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123-0022

Subject: DOI Order No. 3376: Increasing Recreational Opportunities through the use of Electric Bikes

Dear General Superintendent Joss:

Marin Conservation League (MCL) joins other conservation organizations and trail advocates across the nation in protesting the Department of Interior's August 30 blanket order that requires national parks to allow e-bike access to trails currently open to traditional bikes. Beyond national parks, the order will have the effect of opening huge swaths of public land managed by BLM, wildlife refuges managed by USFWS, and properties managed by BOR to a new recreational use that, notwithstanding the redefinition of e-bikes by the Consumer Product Safety Act, continue to qualify under current federal regulations as "motorized vehicles."

To promulgate this sweeping order without any public process is appalling in itself. To issue the order in violation of the Park Service's own policy requiring evaluation of the impacts of new recreational uses on a park's natural, cultural, scenic, and esthetic values, and consistency with safety considerations is alarming. The order fails to consider impacts to hikers, conventional road and mountain bikers, horse riders, and other recreationists who expect to be free from motorized vehicles in their park visitation experience.

MCL fully understands that e-bikes have grown in popularity in recent years and that their use could be integrated with traditional bicycle routes on paved park roads as an alternative to motor vehicle access where determined to be safe and feasible. Further, we recognize that e-bikes qualify for access as Other Power-driven Mobility Devices under the ADA. As the National Parks Conservation Association has said: "E-bikes have a place on national parks' roads and motorized trails, but not everywhere and not on every trail."

Our concerns with adding e-bikes are based on several factors: the ease with which e-bikes can achieve speeds up to 20 or 28 miles per hour, both of which exceed standard speed 15 mph limits on public trails; the greater weight of e-bikes, an added hazard in a collision; the lower entry skill level required by new users; the greater torque on ascent and greater friction from large tires that distinguish the skid marks of e-bikes, with consequent damage to trail surfaces; the potential for unacceptable impact to sensitive resources in migrating off trail; and finally, with expected proliferation of e-bikes as they become more popular, the disturbance of motorized travel to the intangible values of reflection, quietude, and immersion in nature sought by many visitors to the park.

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Specific routes on Marin Headlands

GGNRA is the nation's most visited national park in the nation. The roads and trails that cross Marin Headlands are immensely popular to visitors from around the Bay and elsewhere. In your evaluation of whether to open certain roads and trails on the Headlands, MCL requests that staff acknowledge that many routes currently open to mountain bikes already pose safety issues and the potential for conflict in visitor experience. These routes will become more hazardous for people on foot or horseback if opened to heavier e-bikes with less operator agility to avoid slow-moving visitors. Dirt roads like Bobcat and Miwok have line-of-sight issues in their higher reaches as well as gradients that invite rapid descent. A bike collision with a pedestrian two years ago on Bobcat that never reached public awareness was likely due to speed coupled with limited line-of sight. A heavier e-bike would have dealt even greater injury. Trails such as Old Spring and Diaz Ridge Spur Trail are used regularly by hikers and currently pose potential safety issues from descending bikes. Equestrians that were once present now avoid many such trails. Tennessee Valley Trail, with very mild gradients and good sight lines, is hugely popular and congested by large groups of walkers on weekends; even traditional bikes must proceed with caution, although not all of them do.

Consider also the likelihood of rental e-bikes that could flood popular Headlands trails, as they have flooded the main streets of near-by Sausalito. Regardless of the word "recreation" that is firmly embedded in your name, GGNRA is more than "just another playground"! In addition to being the most visited park in the nation, GGNRA also hosts the most federally-listed threatened and endangered species of any NPS park unit, which only emphasizes the need for enhanced stewardship to ensure that these species will be around for the next generation to appreciate.

In sum

MCL recognizes that national park policy gives you, the superintendent, broad authority to manage recreational pursuits in GGNRA lands. We urge you to consider carefully where the addition of e-bikes to the existing throng of walkers of all ages, runners, horseback riders, and traditional cyclists who enjoy the park will, and will not, be safe and appropriate.

Thank you for your attention.



Linda J. Novy
MCL President



Nona Dennis
Chair of MCL's Parks and Open Space Committee

Cc.

- U.S Congressman Jared Huffman; 999 Fifth Ave. Suite 290 San Rafael, CA 94901
- National Parks Conservation Association, Attention Neal Desai, Senior Director of Field Operations; 350 Frank H. Ogawa Plaza, #1100, Oakland, CA 94612
- People for a Golden Gate National Recreation Area, Attention Amy Meyer; Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123