



Protecting Marin Since 1934

September 20, 2019

Superintendent Cicely Muldoon
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

By email to: cicely_muldoon@nps.gov

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

Dear Superintendent Muldoon:

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 they could integrated along 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 center on the greater 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 important factor in a collision; the likely lower entry skill level required by new users; the greater torque on ascent and 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 off trail; and finally, with expected proliferation of e-bikes as they become more popular, the

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disruption by motorized travel to the intangible values of reflection, quietude, and immersion in nature sought by many visitors to our parks.

Concerns specific to Point Reyes National Seashore

More than two million people visit Point Reyes National Seashore (PRNS, or Seashore) annually. Although a large part of the Seashore is designated Wilderness and hence closed to any bike traffic, popular routes, such as the Bear Valley Trail, attract throngs of walkers, bikers, and equestrians, especially on weekends and holidays. In addition, former ranch roads that have devolved into narrow trails are frequented by slower-moving hikers and equestrians as well as bicycles. Unlike its neighboring GGNRA, which consists predominantly of easily accessed “front country,” the Seashore offers “back country” experience where the object of the travel experience may be remoteness and solitude, free of urban bustle.

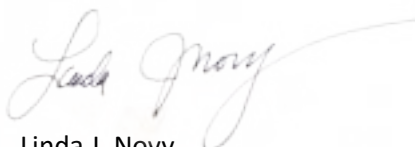
In evaluating whether to open certain roads and trails on the Seashore, MCL requests that staff acknowledge that many routes currently open to road bikes and mountain bikes already pose safety issues and the potential for conflict in visitor experience. Those routes with considerable gradient will become more hazardous for people on foot or horseback if opened to heavier e-bikes with less operator agility to avoid slow-moving visitors. Even trails with very mild gradients and good sight lines can be congested by large groups of walkers on weekends, such that traditional bikes must proceed with caution, although not all of them do.

Consider also the likelihood of rental e-bikes that could flood popular Seashore trails. The Seashore is far more than a national playground! Its attraction is also due to the more than fifty animal species that are state or federally listed as threatened, rare, or endangered, and an equal number of listed vascular plants. This assemblage of sensitive resources 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 on Seashore lands. We urge you to consider carefully where the addition of e-bikes to the existing 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