



Protecting Marin Since 1934

October 26, 2019

Superintendent Laura Joss
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123-0022
By e-mail: goga_public_affairs@nps.gov

Subject: 2019 Draft Final Compendium with E-bikes, dated 9.26.2019

Dear Superintendent Joss:

Marin Conservation League has an 85-year history of conserving public lands in Marin County. The League was actively engaged in securing many of the lands that make of the Marin portions of GGNRA. We have reviewed the "Draft Final" Superintendent's Compendium, dated September 26, 2019, and appreciate the opportunity to follow-up our earlier letter concerning DOI Order No 3376. In the following comments, we want to re-emphasize certain general points and provide more specific reference to GGNRA and examples of roads and trails listed in the Compendium that could be affected by the order. Our comments refer to Marin County portions of GGNRA only, although general principles apply throughout the park.

General concerns

Please review our previous letter for general concerns over adding e-bikes to the current mix of slow and moderate moving recreationists, like walkers, runners, and equestrians, as well as to conventional mountain bikers. They center primarily on two factors: the differential speed among different user groups, an ongoing safety hazard on Headlands roads and trails, even under current conditions; and on characteristics distinctive to e-bikes and their operators.

Park rules state: "The speed limit for bicycles in undeveloped areas is 15 mph and 5 mph in areas of limited visibility, steep terrain, and when approaching other trail users." These speed limits are not posted and in the real world are rarely observed, especially by bikes on descent. They are even less often enforced.

The ease with which even Class I e-bikes can achieve and exceed speeds of 20 miles per hour on descent, coupled with the greater weight of an e-bike, can turn a near-miss into a dangerous collision. Add to this the lower entry skill level required by casual and inexperienced users. As one seasoned equestrian put it: "A lot of bike riders simply don't know how to ride properly around horses. When they don't, dangerous situations can result—for horses, equestrians, and cyclists. E-bikes could compound this, by bringing more, possibly less-skilled riders." Older experienced bikers who have transitioned from conventional bikes to e-bikes can present a new problem unique to e-bikes: speeding uphill as well! An e-biker can travel at uphill speeds double and even triple the speed of a conventional, physically fit mountain biker. This presents its own set of dangers for people walking with families or pets, or with conventional bikers operating within normal limits.

Specific routes on Marin Headlands

In our previous letter we mentioned that the roads and trails that cross Marin Headlands are immensely popular with visitors from around the Bay and elsewhere. The Headlands also has a long

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and notable history as a center for equestrian activity. Many routes currently open to mountain bikes pose existing safety issues and will become more hazardous for people on foot or horseback if opened to heavier e-bikes with less operator agility and physical strength to avoid slow-moving visitors. A sampling of routes with existing problems that would become worse includes the following:

- Bobcat and Miwok Roads, although both are wide, have line-of-sight issues in their higher reaches as well as gradients that invite rapid descent and are dangerous to hikers and horses;
- Old Springs Trail is multi-use, but is narrow and busy, with some poor sight-line sections. Where Old Springs enters the stable, cyclists are asked to walk their bikes, but few actually do. E-bikers, with heavier machines, will be even less inclined to dismount and will try to ride through.
- Middle Green Gulch (uphill only for bikes) would become an uphill speed lane, as its gradient is fairly easy.
- Miwok Trail sections: Wolf Ridge to Rodeo Valley is a steep fire road with poor sightlines... fast uphill meets fast downhill. The Miwok Trail from County View to Tennessee Valley is also very steep, extremely busy, narrow and a major equestrian route from the stable.
- Diaz Ridge Spur Trail is used regularly by hikers and currently poses potential safety issues from descending bikes. Equestrians that were once present now avoid many such trails.
- Tennessee Valley Trail would seem to be a good candidate for e-bikes, with mild gradients and good sight lines, but it 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.

As stewards of the most visited park in the nation, please consider each trail and road carefully before adding e-bikes to the existing throng of hikers of all ages, runners, horseback riders, and traditional mountain bikers who enjoy the park. Will it be safe? Will it satisfy the trail experience of one user but only at the expense of another's experience? Allowing e-bikes on the many paved, multiuse roads and paths in the park can be safe and offer ample opportunities for pleasurable riding. Allowing them on natural surface routes with substantial gradients and curves brings a different set of challenges. Although it may be tempting to treat e-bikes as though they are equivalent to conventional bikes, they are not. E-bikes come with distinctive characteristics, like a battery-fueled motor, extra-large tires and weight. They should not be permitted or regulated as though they are conventional bikes.

Thank you for your attention.



Linda J. Novy
President



Nona Dennis
Chair, Parks & Open Space Committee