



July 20, 2020

Board of Directors
Marin Municipal Water District
220 Nellen Avenue
Corte Madera, CA 94925

Via e-mail [mmwdboard@marinwater.org]

Subject: Access for Electric Mountain Bikes on Water District Natural Surface Roads

Dear Directors:

As you continue your discussion concerning whether or under what conditions to grant access for electric bikes on fire and other emergency access roads on the MMWD watershed, Marin Conservation League would like to weigh in, as we have done throughout our 85 years, on what is “right” for the health of Mt. Tamalpais and its many visitors. MCL has commended District actions on many occasions, but also objected to decisions that, in our view, may result in negative impacts to the natural resources of the mountain and its watersheds, as well as on the large and diverse public who have recreated on District lands for more than the 100 plus years.

The MCL Board has considered appropriate uses of electric-bikes since 2016, when the State redefined e-bikes as non-motorized in the Vehicle Code. After some discussion we agreed to support e-bikes on paved, level multiuse paths, where they serve as alternative non-polluting transportation. Even there, we have some concerns about the ability to regulate the classes of e-bikes as we see significant growth in a large variety of battery-powered wheeled devices. We have drawn the line on accepting e-mountain bikes (e-MTBs) on public lands, however, where rough surfaces, varying widths, often-steep gradients, and line-of-sight present the potential for increased damage to natural resources and increased conflicts among the large numbers of recreationists with different modes of travel seeking different “wildland” experiences.

MMWD is not alone in debating the merits and demerits of adding e-bikes to your recreational user groups. We appreciate that you have gone about your discussion thoroughly and openly. Current e-MTB use on the watershed is relatively benign; the small cohort of aging e-bikers who continue to lobby the District in behalf of their sport appreciate that they can climb with ease without maintaining their former level of fitness. This is simply the beginning, however. As

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cheaper imported products and do-it-yourself kits flood the market, the number of riders will inevitably grow. With advances in technology, especially battery technology, eMTBs are advancing quickly, to the point where they will no longer be compatible on non-motorized facilities. The industry itself advertises its products as “a fundamentally a different sport” from traditional mountain bikes; e-bikes can go “farther and faster.” This poses the problem of future impacts, not knowable at this time.

For these and following reasons, MCL opposes allowing e-MTBs on its road network.


1. Two primary conflict issues are associated with existing mountain bike behaviors: excessive speed on descent, especially around blind corners; and failure to slow when passing slow-moving visitors. The impact of bike speed on visitor safety is not measured by direct accidents as much as by near misses and the “startle effect” of a fast passing bike or sudden braking to avoid collision, both of which are frequent. It is unrealistic to expect these behaviors not to occur among e-MTB users, where the lower entry level will likely attract new, less skilled user groups.
2. MMWD ranger staff are unable to enforce speed limits under existing levels of usage. Educational programs like “Slow and Say Hello,” in which MCL is a partner, can help to modify behaviors, but education must be backed up by rigorous enforcement. As technology advances, it also will become more difficult to regulate classes of e-MTBs, requiring greater ranger resources to enforce appropriate Class 1 bikes.
3. The e-bike industry boasts that e-bikes go “farther and faster.” This should be a warning to land managers that e-MTBs will cause incrementally greater wear and tear on their road network – from both increased volume and greater mileage of use. Braking and skidding by e-MTBs have a marginally greater erosion impacts on road surfaces than conventional MTBs. Visual evidence along MMWD roads shows frequent bike detours off the road that damage adjacent vegetation and disturb wildlife habitat. This can be expected from a sector of e-MTBers as well, who are riding heavier, less agile bikes than traditional e-MTBs.
4. Finally, MMWD’s primary mission is to deliver clean water, not to support a recreational park. Nonetheless, the district has generously accommodated appropriate recreation since its founding. With recreational use comes the reality that different visitors seek different experiences on MMWD “wildlands.” Over recent decades, human-powered mountain bike use came to be accommodated as “passive” recreation (See Policy #7). For those who seek a quiet experience and solitude in the forest – the opportunity to retreat from the pace of the mechanized urban environment – opening the door to e-MTBs will bring a level of mechanization that goes too far in breaking down the important distinction between “Passive” recreation and “active mechanized (motorized) recreation.”

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We appreciate your interest as you continue to discuss this issue.

Sincerely,

A handwritten signature in black ink that reads "Bob Miller". The signature is written in a cursive style and is positioned above the printed name.

Robert Miller
President

cc. Crystal Yezman, Shaun Horne

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