



peopleforbikes

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July 14, 2023

The Honorable Charles "Chuck" Sams III  
The National Park Service  
1849 C Street NW  
Washington, DC 20240

Re: Electric Bicycle Programmatic Environmental Assessment

Dear Director Sams:

On behalf of the PeopleForBikes Coalition ("PeopleForBikes"), thank you for the opportunity to comment on the Programmatic Environmental Assessment (PEA) for the use of electric bicycles (e-bikes) within the National Park System (NPS). **PeopleForBikes supports the proposed action (preferred alternative) outlined in the PEA** because we support allowing e-bike use where regular bicycles are allowed and more specifically, we support Class 1 electric mountain bike access where regular mountain bicycles are allowed on natural surface trails. Should the proposed preferred alternative be adopted, we look forward to assisting the NPS and park superintendents with resources to support a successful implementation of this policy.

Electric bicycles are the largest growing sector of the bicycle industry in the U.S. and globally because they are uniquely capable of allowing more people to ride a bicycle for different purposes. Their use can bring the pleasure and freedom of bicycling to many more types of users and facilitate recreation for new demographics.

The PeopleForBikes Coalition is the sole trade association for U.S. manufacturers, suppliers, and distributors of bicycle products, including electric bicycles. Our 335 members represent companies that produce goods in every segment of the bicycle market, from high-end competition bicycles to affordable kids' bikes. Our members produce the full range of components, parts, and accessories used for bicycling, as well as bicycles and electric bicycles. We also house a nonprofit foundation that speaks for 1.5 million grassroots bicycle advocates and enthusiasts across the United States.

PeopleForBikes' overall mission is to make America the best place in the world to ride a bike by advancing good policy, safe products, improved infrastructure, wider participation, and rider education. We work with both the industry and local, state, regional, and federal



partners to meet the growing demand for safe and accessible trail networks across the United States.

Across local, state, and federal land management agencies, we continue to advocate for electric bicycle access where regular bicycles are allowed such as multi-use paths, rail-trails, bike lanes, and roadways. We also advocate for Class 1 electric mountain bike access where analog mountain bikes are allowed on natural surface trails.

We appreciate the National Park Service's inclusion of the three-class electric bicycle definition and recognition of electric bicycles as separate and distinct from motor vehicles. The proposed action would allow park superintendents to offer commonsense e-bike access on federal lands managed for recreation, serving visitors and land managers alike.

E-bike access expands the demographics of park visitors and their available experiences within the national park system. The low-speed electric assist they provide reduces the barrier to entry for bicycling and for bike trails in our national parks. When implemented, a policy that allows for responsible electric bicycle access would allow new visitors across the spectrum of physical fitness to partake in the joy that riding on a designated bike trail in a national park can offer.

Additionally, e-bikes are a practical solution for reducing car traffic and congestion in the NPS as another mode of transportation to tour and visit our nation's parks in lieu of a carbon emitting and traffic-inducing vehicle. E-bikes are a viable tool for both transportation and recreation during a time of increased congestion and soaring demand for outdoor access, while also being a climate solution by decreasing our reliance on fossil fuels. If enacted, we would encourage superintendents to leverage the policy to allow for e-bike access on all roads, trails, and paths where regular bicycles are allowed, to fully maximize these benefits.

As it relates to trail access, findings from the East Zone Connectivity and Restoration Project Environmental Assessment in Tahoe National Forest indicate that pedal-assist Class 1 e-bikes can be successfully incorporated into trails with non-motorized uses.<sup>1</sup> Included in the East Zone Connectivity's final decision notice was the designation of existing non-motorized trails as open for Class 1 e-bikes. With the introduction of Class 1 e-bikes on natural surface trails where mountain bikes are already allowed in the East Zone, staff

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<sup>1</sup> USDA Forest Service. "Tahoe National Forest East Zone Connectivity and Restoration Project Draft Decision Notice." (2021).



found that they do not significantly alter public enjoyment or affect the patterns of use on those trails. In most places, traditional mountain bikes and Class 1 e-bikes have similar effects on the physical trails and public use patterns.<sup>2</sup> As noted in the Preliminary Environmental Assessment for the Pines to Mines Trail Project in Tahoe National Forest, the impacts to trail tread and speed differentials have not been shown to be affected by Class 1 e-bikes compared to analog mountain bikes:

“Effects on trails are not considered to be significantly different between traditional mountain bikes and Class 1-E-Bikes. Their equipment components are similar including wheel size, tire tread, gearing, chain, brakes, and gear shifting mechanisms. Impacts to trails in terms of tread wear, soil movement, erosion, and contribution to sediment delivery have also been shown to be similar (Wilson and Seney 1994; Weaver and Dale 1978; IMBA 2015). Finally, a review of literature, consideration of current user trends, and USFS observations of use characteristics during the 2019 season when Class 1 E-Bikes were allowed on all non-motorized trails on the forest, determined there are no significant differences between the two vehicle classes with respect to relative speeds (Langford et al. 2015; TNF Unpublished 2020) and user behavior (Langford et al. 2015).”<sup>3</sup>

Pedal-assist Class 1 e-bikes are an emerging technology that makes the activity of mountain biking more accessible and enjoyable to users with different levels of experience, skill, and physical ability. Class 1 e-bikes look, are equipped, and ride like traditional bicycles and simply give riders – regardless of age, physical, or cognitive ability – an extra assist while pedaling. When introduced on- or off-road, studies have shown that there appear to be minimal conflicts between e-bike riders and other user groups, with no material safety distinctions between e-bikes and conventional bicycle use.<sup>4</sup>

Land managers have reported using e-bikes to perform administrative duties, including increasing visitor services capacities, ability to carry heavier loads without the assistance of a motor vehicle, and ability to reach more remote parts of their parks. According to the

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<sup>2</sup> USDA Forest Service. “Tahoe National Forest East Zone Connectivity and Restoration Project Draft Decision Notice.” (2021).

<sup>3</sup> USDA Forest Service. “Preliminary Environmental Assessment: Pines to Mines Trail Project.” (2023).

<sup>4</sup> [Jefferson County, Colorado Electric Bicycle Study \(2017\)](#)



Federal Highway Administration, e-bikes may fill an important role as emergency response vehicles and support search-and-rescue teams operating in remote areas.<sup>5</sup>

With e-bikes, land managers can reduce their carbon emissions while decreasing time spent traveling to remote trail building project sites and increasing efficiency for staff with routine park maintenance and patrolling. This includes easier and shorter travel time on a variety of surfaces such as trails, sidewalks, open spaces, inclines, more personable interactions with the public, and less risk of injury and fatigue by staff. For example, within Olympic National Forest, road segments that were selected for an annual deferred maintenance assessment were unreachable by motor vehicles due to storm damage, and e-bikes or were noted as a potential method to access the specific segment to be assessed.<sup>6</sup>

Given the rise of recreational e-bike use on trails across the United States, PeopleForBikes developed a [policy position for e-bikes on natural surface trails](#) in 2022. We encourage state natural resource agencies to align electric bicycle regulations with those applicable to traditional bicycles and afford local land managers the authority to allow Class 1 electric mountain bikes on non-motorized natural surface trails in places where traditional mountain bikes are allowed (including singletrack trails). These changes would harmonize state land management policies with the actual products that people are riding, proactively manage the desired experiences of e-bike riders, and provide for their safe operation, consistent regulation, and reasonable use.

This policy position can and should be extended to federal land management agencies, including the National Park Service. Clear and consistent regulations for electric bicycle use across different jurisdictions makes it easier for visitors and bike riders to understand and comply with the law.

Thank you for your consideration of our comments. We welcome the opportunity to provide further information on our comments, including support for the allowance of e-bikes where regular bicycles are allowed, together with Class 1 electric mountain bike access on natural surface trails. We appreciate the chance to share our resources and knowledge.

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<sup>5</sup> Federal Highway Administration Western Federal Lands Highway Division and the U.S. DOT Volpe Center. "The Future of E-Bikes on Public Lands – Research Synopsis." (August 2022).

<sup>6</sup> Federal Highway Administration Western Federal Lands Highway Division and the U.S. DOT Volpe Center. "The Future of E-Bikes on Public Lands – Research Synopsis." (August 2022).



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Sincerely,

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