

October 10, 2019

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

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

Dear General Superintendent Joss:

The Marin Horse Council is writing to express our opposition to the recent directive issued by the Department of the Interior which grants e-bikes access to all national park roads and trails currently open to traditional bikes. This directive reclassifies e-bikes as non-motorized vehicles. It also requires that national parks grant e-bikes access to their multi-use natural surface roads and trails—roads and trails that have been historically restricted to non-motorized use.

By definition, e-bikes qualify as motorized vehicles. E-bikes are powered by lithium-ion batteries. These batteries have demonstrated a propensity to occasionally catch on fire—which alone should be reason enough to not allow e-bikes on the natural surface roads of the Marin Headlands. Under motor, e-bikes are capable of traveling for long distances at speeds of up to 28 mph. If the motors are tinkered with, e-bikes can achieve even faster speeds. The speed limit in the Headlands is 15 mph and 5 mph when passing others. Why allow vehicles access that are capable of exceeding these speeds?

The Marin Horse Council is concerned and disappointed that this directive was issued without the inclusion of any sort of public process. The directive fails to take into consideration the pleasure and safety of the parks' other visitors—its horseback riders, hikers and riders of conventional bikers—all who visit the parks to enjoy a peaceful and relaxing outing far removed from the hustle and bustle of modern day life. The introduction of e-bikes traveling at speeds of over 20 mph around blind corners and on narrow trails poses obvious threats to the pleasure and safety of these visitors—especially to the riders of horses, the elderly, parents with small children and groups of school children on field trips.

Given the current lack of any significant ranger presence and/or enforcement of speed limits on the roads and trails in the Marin Headlands, the Marin Horse Council feels that it is irresponsible of the GGNRA to even be considering the introduction of e-bikes. Traditional bikes have been the cause of several serious and documented injuries to hikers and horseback riders on these trails. The addition of e-bikes to the Headlands' already congested trails will unquestionably result in an increase in the number of these accidents. It will also result in the displacement of even more horseback riders and hikers, many of whom already feel the need to avoid certain trails because they fear for their safety.

Horses have been a popular cultural and historic part of the Marin Headlands landscape for many years. Trails that lead directly to and from Miwok, Muir Beach and the Rodeo Valley Stables should remain closed to e-bikes. Already, Miwok Stables has been forced to suspend its weekend guided public trail

riding program due to the safety risks associated with the high traffic of conventional bikes traveling at unsafe speeds on Marincello and Old Springs. This displacement of horseback riders from trails that lead directly to and from a stable is tragic.

The Marin Horse Council would like to request that the GGNRA give some real thought and consideration to the pleasure and safety of its horseback riders, hikers and riders of conventional bikers before opening these trails to e-bikes. We are specifically concerned about the Marincello, Old Springs, Diaz, Middle Green Gulch, Bobcat and Miwok trails.

The Marin Horse Council fears that the introduction of e-bikes to the Marin Headlands' natural surface roads and trails will result in an entirely new group of park visitor—one seeking the thrill of traveling at very fast speeds with little effort. We fear that many members of this new breed of biker will lack the expertise to competently control their bikes, but will yet venture further distances—increasing the risk for emergency response. We also fear that they will lack the ability to properly slow down and safely pass other users on the trails. Finally, we fear that the faster speeds and greater weight and torque of e-bikes will result in unnecessary damage to the trails, threaten sensitive plant species and disrupt wildlife patterns.

Along with other trail advocates, the Marin Horse Council opposes e-bikes on the natural surface roads and trails of the Marin Headlands—with the exception of those who qualify under federal ADA Laws. We also feel that the natural process of aging or “slowing down” should not qualify as a handicap. Restricting e-bikes to the paved roads and trails in the Headlands seems more appropriate than granting them access to roads and trails which have been historically designated as for non-motorized use.

Before making your final decision as to which natural surface roads and trails in the Headlands that you open to e-bikes, we once again urge you to thoroughly consider: the flammable properties of e-bikes, the potential negative impact of e-bikes on the pleasure and safety of all Headlands visitors, the current limitations on enforcement and your commitment to protecting the park's natural resources.

Sincerely,

Richard Holland
President, Marin Horse Council

Amory Willis
Vice-President, Marin Horse Council