April 22, 2020

National Park Service
Regulation Identifier Number (RIN) 1024-AE61

RE: SUPPORT | Secretary’s Order 3376 - Increasing Recreational Opportunities through the use of Electric Bikes

In response to Secretary’s Order 3376, the undersigned organizations are submitting the following comments in support of the proposed regulation of electric-assist bicycles in National Parks.

E-bikes have become immensely popular across the world over the past decade as an affordable, space-efficient, and fun means of mobility. E-bikes also improve access to members of the disabled community who can no longer ride a standard bicycle, and bicycling feasible for a greater subset of the public when longer distances (e.g., 5 miles or more), steeper inclines, and/or hotter temperatures are involved. Last but not least, the barrier to entry for electric-assist bicycles is low, especially when compared to the cost of a new electric vehicle.

Mostly limited to 20mph, pedal-assist electric bicycles simply help the operator move the bicycle. In National Parks that are increasingly grappling with the heavy burden of their own popularity - and the accompanying impacts of automobile congestion and vehicle parking - these devices could provide a viable alternative means of transportation for intra-park trips at little/no cost to the parks system itself. This could be accomplished via rental or sharing programs similar to those successfully introduced in communities and college campuses across the United States over the past decade. Some parks such as Zion have successfully implemented free shuttle programs to reduce automobile traffic and congestion. Electric-assist bike share could build upon this foundation and provide an on-demand, zero-emission alternative to shuttles for park visitors.

The proposed legislation would in large part update existing policy which precludes the use of electric bicycles in National Parks. If approved, visitors would be able to use electric-assist bikes in areas designated by the Park Superintendent where traditional bicycles are allowed, including public roads, parking areas, administrative roads, paths, and trails. Superintendents would still retain the right to limit, restrict, or impose conditions on the use of any type of
bicycle in order to ensure visitor safety and protect resources. In addition, the policy change would not permit the use of electric-assist bicycles in designated wilderness areas.

If approved, the change should also be paired with bicycle safety and access improvements at parks facilities where lacking and feasible. These include secure bicycle parking at key destinations (e.g., visitor centers; trailheads), wayfinding signage, and dedicated bikeways on park roads where motorized vehicles are permitted. Such improvements will facilitate the use of electric-assist bicycles where appropriate.

As community-based organizations committed to supporting clean air, healthy lifestyles, and public access to parks and open space, the undersigned support efforts to regulate and facilitate the use of electric-assist bicycles in National Parks.

Thank you for your time and consideration,

**David Diaz**  
Executive Director  
ActiveSGV

**Jared Sanchez**  
Senior Policy Advocate  
California Bicycle Coalition