



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

March 16, 2020

Mr. Matt Anderson
Chief Ranger, Visitor Services Department
Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022-1404

RE: E-Bikes on Midpeninsula Regional Open Space District Trails

Dear Mr. Anderson,

We are writing to respond to your inquiry of March 6, 2020, and to provide more detail to express our continuing concern regarding pending consideration by Midpeninsula Regional Open Space District (MROSD) to permit electric bikes on trails open to mountain biking throughout the District. The MROSD Board called for a data-driven analysis before another e-bike scheme is presented for review. Accordingly, please note that the following assertions we make concerning e-bikes are fully documented at the end of this letter.

In our view there is no overwhelming public demand for e-bikes on MROSD trails.ⁱ In fact, the MROSD's most recent District-wide user survey and focus group interviews, conducted at a cost of \$172,000, documented no mention of mountain bikes, e-bike or conventional, except in negative terms as a result of conflicts with non-biking trail users.ⁱⁱ

According to the Outdoor Industry Association, there is no growth in mountain bike popularity because sales have been flat since 2001.ⁱⁱⁱ E-bikes exist to make up for that deficiency, sales of which will compensate retailers and manufacturers who have lost revenue from the static popularity of conventional mountain biking. While there is no growth in mountain biking there is growth in hiking and walking.^{iv} The majority of MROSD trail users are hikers and walkers - not bikers. The District's own user survey and the user surveys of San Mateo County Parks and Santa Clara County Parks clearly state hiking and walking are the most popular activities on our local public lands.^v

The primary proponents of conventional and electric mountain biking are organized biking groups supported in large part by funding from bike retailers and manufacturers whose contributions are most likely tax deductible.^{vi} Flush with donated money that some donors characterize as "investments," local biker groups deploy paid staff they otherwise would not be able to afford who persistently lobby public land managers to open trails to mountain bikes, powered or otherwise.^{vii}

E-bikes are motorized vehicles having more in common with motorcycles than bicycles.^{viii} The Sierra Club supports the concept of such vehicles as an excellent transportation alternative. We do not perceive MROSD, POST, GGNRA or SFPUC trails as transportation trails. E-bikes enable riding faster and longer on trails and are not marketed to seniors needing help biking but to younger folks seeking to ride further, faster and longer.^{ix} Once MROSD permits motorized vehicles on trails it will be nearly impossible to regulate against faster and more powerful e-bikes. If motorized bikes are allowed then we do not see what would be the limiting principle that would differentiate acceptable e-bikes from unacceptable e-bikes.

E-bikes on MROSD trails would create a new and troubling user conflict that reflects the growing divide between proponents of e-bikes and those conventional mountain bikers who oppose them.^x Why the opposition? Because e-bikes negate one of the legitimate reasons justifying mountain biking in the first place, that it is a healthy form of exercise.^{xi} The reality of e-bikes poses questions about the verity of that claim.^{xii} As a result, some defenders of conventional mountain biking are concerned that e-bikes on open space trails will present an unfavorable image about mountain biking, that they are more about speed and thrills than pursuing a healthy lifestyle.

There are two kinds of major trail users — hikers and bikers. Multiple use means that mountain bikes have a tendency to dominate any trails to which they have access because they are larger and faster than human beings.^{xiii} Over time hikers can be displaced as bikers rule.^{xiv}

E-bikes would result in more intense activity of bikes on trails that would increase small animal fatalities and negatively impact larger animal feeding and breeding behavior as well as trail-side plant communities.^{xv}

Conflicts between mountain bikers and hikers have existed for decades. Most certainly, as an obvious extrapolation of greater speed and power, e-bikes would further endanger non-biking trail users, especially children and the elderly.^{xvi} E-bikes have the potential to accelerate a decrease in non-biking trail users and could further create the impression that district lands are playgrounds for people who can afford expensive e-bikes. Minority communities, who according to the District's own comprehensive user survey, already feel unwelcome on District lands are not likely to react positively to the coming of e-bikes.^{xvii}

We don't believe any more data than what is already available to the District is necessary to clearly demonstrate that e-bikes on nature trails are a bad idea. E-bikes are the newest promotion the mountain bike industry is proffering to influence public land managers who we are hopeful will recognize their number one obligation, to protect the environment entrusted to their care which user surveys repeatedly make clear is the public's highest priority.^{xviii}

Clearly, the tax paying public expects more from MROSD than proposing to open trails to motorized vehicles. MROSD is not a transportation agency. It is an open space district. Accordingly, we believe MROSD should resist the importuning of e-bikes advocacy – or any

powered vehicles for that matter - now and in the future in order to maintain consistency with its basic mission – the protection and enjoyment of the natural environment of the Peninsula.

Sincerely,



Katja Irvin and Gladwyn D'Souza
Conservation Committee Co-Chairs
Sierra Club Loma Prieta Chapter

Cc: MROSD Board Members

ⁱMidpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf

ⁱⁱ"Recommended Areas of Focus," *Midpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project*, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf

ⁱⁱⁱ"Outdoor Recreation Participation," *Top Line Report 2017*, Outdoor Foundation, page 8. https://outdoorindustry.org/wp-content/uploads/2017/04/2017-Topline-Report_FINAL.pdf, and "Demographics of Mountain Biking" International Mountain Bicycling Association, <https://imbacanada.com/demographics-of-mountain-biking/>

^{iv}"Participation in Outdoor Activities," *2018 Outdoor Recreation Participation Report*, Pages 36-37, <https://outdoorindustry.org/resource/2018-outdoor-participation-report/>

^vMidpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf

2018 Visitor Survey Findings, Santa Clara County Parks, <https://www.sccgov.org/sites/parks/Whats-Happening/Documents/visitor-survey-2018.pdf>; *Visitor Use/Non-Use Parks Study 2015-2016*, San Mateo County Parks, page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>; and

^{vi}Mountain Bikers of Santa Cruz, <http://mbosc.org/sponsors/> and <http://mbosc.org/about>

^{vii}\$15,000 donation from REI to Mountain Bikers of Santa Cruz, <https://www.rei.com/assets/stewardship/2018/2018-rei-grants/live.pdf> and <http://mbosc.org/jobs/> and REI gives \$500,000 to biker groups nation-wide <https://www.rei.com/stewardship> and <https://www.rei.com/assets/stewardship/2018/2018-rei-grants/live.pdf>

^{viii}"Over a Beer: Why Ebikes Are the Spawn of Satan (mostly)," *Singletracks*, May 4, 2016, <https://www.singletracks.com/mtb-columns/over-a-beer-why-ebikes-are-the-spawn-of-satan-mostly/>

^{ix}E-mountain bike commercials, <https://www.youtube.com/watch?v=6ng0nSY9CZY> <https://www.youtube.com/watch?v=0ZFq-09gzTw> <https://www.youtube.com/watch?v=FfbUI2Hd6JE> https://www.youtube.com/watch?v=Us-Ndx_b_Bo and

"Does The E-Bike Invasion Represent A Menace To Wildlife And Character Of Public Lands?" *Mountain Journal*, Sept. 25, 2019, <https://mountainjournal.org/do-ebikes-represent-a-menace-to-wildlife-in-the-backcountry>

^x"Over a Beer: Why Ebikes Are the Spawn of Satan (mostly)," *Singletracks*, May 4, 2016, <https://www.singletracks.com/mtb-columns/over-a-beer-why-ebikes-are-the-spawn-of-satan-mostly/>

^{xi}*Mountain Biking as a Means to Encourage Public Health and Wellbeing*, 2017, Wright State University, Dayton, Ohio, <https://corescholar.libraries.wright.edu/mpb>

^{xii}“The Ebike Trade-Off Seems To Be Less Exercise, More Enjoyment. And Fewer Showers,” *The Washington Post*, May 9, 2018, https://www.washingtonpost.com/lifestyle/wellness/the-ebike-trade-off-seems-to-be-less-exercise-more-enjoyment-and-fewer-showers/2018/05/05/5990770a-4ede-11e8-b725-92c89fe3ca4c_story.html

^{xiii}“Hiking Speed,” *Trail Trove*, <http://trailtrove.com/hiking-speed> and “Average Mountain Bike Speed,” *Mountain Bike Report*, <https://www.mountainbikereport.com/mountain-bike-speed>

^{xiv}“Do Bikes Belong in Wilderness Areas?” *Sierra*, Dec. 20, 2017, <https://www.sierraclub.org/sierra/do-bikes-belong-wilderness-areas> and *Castle Rock State Park General Plan, 2000*, p. 105, https://www.parks.ca.gov/pages/21299/files/cr_final_gp_no_maps.pdf (serious threat to Castle Rock’s landscape and ecology). Note, speeding bikes on trails was a recommended area of user concern in a survey of users conducted for the Midpeninsula Open Space District. “Recommended Areas of Focus,” *Midpeninsula Regional Open Space District’s 2017-2018 Preserve Use Survey Project*, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf and from *Visitor Use/Non-Use Parks Study 2015-2016*, San Mateo County Parks,” page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>

^{xv}“Impacts of Mountain Biking,” *The Wildlife News*, June 18, 2019, <http://www.thewildlifeneeds.com/2019/06/18/impacts-of-mountain-biking/> and “When Bikers and Bears Don’t Mix,” the *New York Times*, Oct. 9, 2019 <https://www.nytimes.com/2019/10/07/science/bears-biking-national-parks.html> and “Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review,” 2016, *PLOS ONE*, https://www.researchgate.net/publication/311527071_Effects_of_Recreation_on_Animals_Revealed_as_Widespread_through_a_Global_Systematic_Review and “The Impacts of Mountain Biking on Wildlife and People, A Review of the Literature,” *Cultural Change*, Sustainable Energy Institute, July 3, 2004, http://www.culturechange.org/mountain_biking_impacts.htm

^{xvi}Note, speeding bikes on trails was a recommended area of user concern in a survey of users conducted for the Midpeninsula Open Space District. “Recommended Areas of Focus,” *Midpeninsula Regional Open Space District’s 2017-2018 Preserve Use Survey Project*, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf and from *Visitor Use/Non-Use Parks Study 2015-2016*, San Mateo County Parks,” page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>

^{xvii}A recent Midpeninsula user survey revealed minorities in the Bay Area perceive a visit to Midpen properties to be culturally challenging with perceived barriers to entry. “Recommended Areas of Focus,” *Midpeninsula Regional Open Space District’s 2017-2018 Preserve Use Survey Project*, https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf

^{xviii}A 2014 survey of park users conducted by the California State Parks Department found that 60% of respondents believed environmental protection was the most important mission of the State Parks Department. *Survey on Public Opinions and Attitudes on Outdoor Recreation in California 2012, Complete Findings* issued in January, 2014, https://www.parks.ca.gov/pages/1324/files/PublicOpinionsAttitudes2012_spoa.pdf