



July 21, 2023

Electric Bicycle Programmatic EA  
National Park Service  
1849 C Street NW, MS-2472  
Washington, DC 20240

**Re: Programmatic EA - Use of Electric Bicycles Within the National Park System**

To Whom It May Concern:

I am writing on behalf of the Washington Area Bicyclist Association (WABA) and its nearly 6,000 members across the Washington metropolitan area to provide comments on the National Park Service's programmatic environmental assessment and proposed action regarding the use of electric bicycles with the National Park System.

For fifty years, WABA has worked to transform the capital region by improving the conditions for people who bike. Our work to advocate for dedicated bike infrastructure, pass laws that promote safe roadway behavior, and provide education programming for all road-users has resulted in a drastically different cultural and political approach to biking for transportation. Biking – including e-bikes – can and should be an equitable, safe, low-cost, time-saving, and sustainable way to navigate our cities and parks for all visitors and users.

We are as eager today to see the National Park Service establish consistent definitions and guidelines for the use of e-bikes and to resolve regulatory uncertainty about how e-bikes are managed as we were in 2020 when we submitted comments and [drove public support](#) during the original rulemaking process. We continue to believe in the transformative potential of e-bikes for both recreation and transportation, expanding and unlocking opportunities for people who may not be able to ride a traditional bike.

WABA therefore generally supports this updated rulemaking and the proposed action/preferred alternative; however, we are extremely wary of the administrative burden that recertifying trails for e-bike use will put on strained NPS units. Requiring park units to undergo a new cumbersome process to evaluate e-bikes on trails creates substantial administrative labor and public debate that will yield similar results. We offer the following comments and suggestions as means of easing that burden.

Our preferred alternative would be to enact the 2020 rule as written, whereby e-bikes are allowed on *any* trail in which traditional bikes are allowed with no separate planning, compliance, written determinations, public notice, and rulemaking required. As NPS' own research makes clear, e-bikes usage does not meaningfully increase environmental impacts compared to traditional bikes. Therefore, the easiest path forward is to continue to allow e-bike use wherever traditional bikes have been permitted.

If NPS remains adamant about subjecting e-bike usage on trails to a separate and additional review, we strongly encourage that the review process be expedited and fast-tracked to the greatest extent possible. Backpacking, day hiking, and trail running are all just types of walking, albeit at different speeds and weights; bicycling is really no different. The review process should therefore reflect the near-identical impacts of e-bikes versus traditional bikes in contrast to, say, the review of a completely new trail usage case.

Of particular note, we strongly encourage no additional review or highly expedited review for e-bike usage on substantially constructed and paved trails that allow bicycle use. We believe that any environmental impact concerns are most marginal on these most heavily-trafficked and robustly-engineered surfaces. Here in the National Capital Region, NPS paved trails like the Mount Vernon Trail and Capital Crescent Trail are some of the most popular and important pathways for transportation and recreation. We see no reason why e-bike usage – already widespread and generally noncontroversial – need be re-litigated to achieve the same current state.

For e-bikes to achieve their full potential of expanding accessibility and access while minimizing impacts to our park spaces we must transition from a mindset of begrudging toleration to one of embrace and invitation. It is therefore imperative that NPS minimize or remove where possible in this and any rulemaking any delineation or 'othering' between traditional and e-bike usage.

We remain encouraged overall by NPS efforts and appreciate this opportunity to submit comments. We look forward to the next steps in this programmatic environmental assessment process to riding our bikes – electric and otherwise – in more parks and places nationwide.

Respectfully,

Kevin O'Brien

Virginia Organizer | Washington Area Bicyclist Association