



# Denali Citizens Council

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## **Comments on “Use of Electric Bicycles within the National Park System” Programmatic EA Submitted by PEPC on July 21, 2023**

These comments are submitted on behalf of the board and members of the Denali Citizens Council (DCC), a nonprofit organization founded in 1974 and headquartered at Denali National Park, Alaska. DCC advocates for preservation of Denali Park’s ecologic integrity through careful planning and administration, and advocates for sustainable land management practices on gateway lands outside Denali National Park. Ours is the only advocacy organization focused entirely on Denali.

We have read the Programmatic EA for use of Electric Bicycles within the National Park System and are guardedly supportive of Alternative 2, which allows use of e-bikes on roads and trails where regular bikes are authorized (as long as such authorization of regular bikes has been made through a NEPA process). We agree that the use of e-bikes should be subject to superintendent discretion.

We do have the concern that authorization of e-bikes wherever regular bikes are used creates a false equivalency between the two modes of transportation. The purpose of the e-bike is to make it easier to propel oneself and have the capacity to go faster than may be safe. Of course, NPS seeks to limit unsafe use of e-bikes but also supports the extra help they provide to visitors with less strength. The fact remains, however, that e-bikes can be a riskier transportation alternative in our parks.

We have some concerns and suggestions regarding the content of this EA below:

1. We are not sure how “superintendent discretion” will be implemented. Will superintendents utilize the Compendium process? NEPA? What will be the proof standard? It is not clear from the content of this EA how “discretion” will become action. This EA is a strong open door for e-bike use, with few sidebars. We suggest some reasonable limitations of e-bike use below, along with a toolbox for superintendents.
2. We are uncertain that adequate authorization for use of regular bikes on roads and trails has already been done in the various parks. NPS may find itself in the position of authorizing e-bikes on bicycle trails, paths, roads, and other areas where regular bicycle use was never appropriately authorized.
3. This EA, and the original EO 3376, spend some time insisting that e-bikes are not “motor vehicles.” Why is this necessary and what efficiency or environmental good does this provision accomplish? What effect on Wilderness Act prohibitions would this have? Our position is that you remove the provision that e-bikes are not motor vehicles (p. 7) in the final version of this document. We consider it probable that e-bikes of the future will become more independently driven by an electric motor, while still being called e-bikes. Already, Class 2 e-bikes could meet that definition. The e-bike definition will likely be stretched to incorporate clearly motorized vehicles. It is confusing and risky to define them as non-motor vehicles now.

4. We have been troubled by the current trend toward authorization of regular bikes in Wilderness areas of Alaska, under the thinking that their use comports with ANILCA's access provisions. In Denali, regular bikes can now bypass the park road and go into Wilderness for a few miles in the middle of the park while the regular road is closed. E-bikes could follow regular bikes into Alaska Wilderness under this EA. This seems a contradiction, since the EA itself, on page 6, prohibits "possessing a bike in Wilderness." Please address this conflict in the FONSI for this EA.
5. At Denali National Park, a case can be made for strengthening existing regulations for e-bike and regular bike use on the narrow park road, which has limited shoulders and no pavement for much of its length. We are hoping that this can be accomplished through the Superintendent's Compendium, and that complex findings of impairment will not be required to strengthen the rules. We truly feel that this EA is the best place to put a few sidebars, that would apply to all parks.
6. In the FONSI, please authorize only Class 1 e-bike use. This will better reflect the intent of the EA to prohibit extended use of the motor alone, since Class 1 e-bikes already limit this use. Class 1 e-bikes provide plenty of assistance to those with less strength, and have a maximum unassisted speed of 20 MPH. In fact, 20 MPH is already too fast for most multi-use roads and trails, and the EA should suggest speed limits of maximum 10 MPH. Multi-use trail issues and problems are already observable on the Tony Knowles Coastal trail in Anchorage. These issues exist in all parks and should be addressed in this EA.
7. The EA should require that each new trail project make a detailed analysis of how use of bicycles (and e-bikes) can be kept safe, especially in very crowded areas with multiple uses. Some tools of regulation could be speed limits, hours of use limits, and of course class of e-bike limits. We realize that this EA is giving superintendents the entire discretion on how to regulate e-bikes, but it would strengthen the EA to provide regulatory encouragements and examples, a toolbox if you will.
8. Single track competitive forms of biking are not appropriate for National Park lands and should not be authorized, system wide. We hope the FONSI will make a statement indicating that competitive activities are not the intent of bicycle use in national parks, but instead slower speed sightseeing, trekking and access from one place to the next on authorized roads and trails. This EA does not differentiate this kind of activity, and may not be the appropriate place to do so, but there should be sidebars for overly aggressive use of bicycles in all parks.

We appreciate the opportunity to comment on this EA and would like to be sent a copy of the FONSI when finalized, to [dcc@denalicitizens.org](mailto:dcc@denalicitizens.org). Call us at 907-244-2510.

Sincerely,

DCC Board

*Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Scott Richardson, Nancy Russell*