

Trail Mix Committee Agenda

Tuesday, June 9 2020

11:00 AM via conference call

Per Executive Order 2020-5 issued by Governor Gary R. Herbert on March 18, 2020, this meeting will be conducted electronically. An anchor location will not be provided.

conference call: 435-259-4138 : select Line 1 : password is "123456"

- 1. Introductions**
- 2. Trail Mix business**
 - Vote to approve Trail Mix comments to BLM re: e-bike regulations (see below)
 - Spanish Trail figures - location issues update - right of way issues
 - Skills park on Mill Creek Parkway - update
- 3. County Update – Mila Dunbar-Irwin, Zacharia Levine, Evan Clapper**
- 4. City Update – Cory Shurtleff**
- 5. BLM Update – Katie Stevens, Jennifer Jones**
- 6. Forest Service Update – Brian Murdock, Zachary Lowe**
- 7. Trail Report – Maddie Logowitz, Tyson Swasey**
- 8. Biking Report – Aaron Lindberg**
- 9. Climbing/Canyoneering Report – Brett Sutteer**
- 10. Equestrian Report – Stephen Schultz**
- 11. Hiking Report – Marc Thomas**
- 12. Trail Running Report – Justin Ricks**
- 13. Ski Report – Kirstin Peterson**
- 14. Citizens to be heard**

To have your comments considered for the Citizens to Be Heard portion of the electronic meeting, please email your comments to: MoabTrailMix@gmail.com

Comments must be received by 9:00 AM June 9. Please limit them to 400 words.

Bureau of Land Management
Department of the Interior
Washington, DC

re: RIN 1004-AE72

Grand County Trail Mix is the official entity authorized by Grand County, Utah to plan, design, build, and maintain non-motorized trails in and around Moab, Utah. This area includes such world-famous trails as Slickrock - one of the first mountain bike destinations in the country - which has now become a popular e-bike trail. In our county, there are already well over 1,000 miles of dirt roads and trails open to e-bikes; only roughly 150 miles are closed to motorized travel.

As a part of our work, we have significant experience with e-bikes, and with the multiple issues arising from their use on non-motorized trails. We are opposed to RIN 1004-AE72 in its current form. We believe that, if adopted, it will cause significant negative impact to many existing trails, leading to increased taxpayer costs for maintenance and repairs, and a decreased overall user experience. Outlined below are the reasons behind our viewpoint, based directly on our first-hand experience with e-bikes on our trails.

- Current e-bike power levels are too high. 750 watts is far more than a trained professional cyclist can generate; even Lance Armstrong at his drug-enhanced best generated less than 500 watts. Many bikes are available at a 250 watt level (e.g. the Specialized Turbo Levo SL); this is far more in line with what a strong, talented rider can generate.
- E-bikes are popular with inexperienced, beginner cyclists. With a normal bike, a beginner will be riding slowly, and will be able to stay on the trail through corners. With an e-bike, their limited skills are not able to go through a turn at high speed; this leads to them riding off the trail, damaging the environment, and requires extra trail maintenance to repair. We are seeing this kind of damage regularly on our trail systems.
- Adding to this problem is the poor equipment level on most e-bikes. E-bikes are larger, heavier, and travel faster than regular bikes - but are not equipped with better brakes. This compounds issues with riders not able to stay on the trail.
- One popular argument for e-bikes is that they are "necessary" for the elderly or those with medical issues. With a class 1 pedal-assist e-bike that is clearly not true - the rider still needs to be pedaling for the bike to move. The electric assist merely allows them to ride faster. A rider who goes out for one hour on a regular bike might cover six miles; the same rider in one hour on an e-bike might cover twelve - but the rider would have put in the same effort and received the same benefit from exercise in both cases.
- E-bikes are a nightmare for law enforcement. We see e-bikes illegally riding on our trails almost every single day; the riders do not care, since they know that their chances of being caught and prosecuted are so low. Currently, it is easy for a law enforcement officer to tell an e-bike from a regular bike, even at a distance. Allowing some e-bikes but not others will make this an impossible task; it would take a trained engineer to determine the power level of an e-bike. There are numerous kits available already to boost the power output of a Class 1 e-bike to 1,000 watts or more; and there are many e-bikes available with 5,000 or 10,000 watts (13 horsepower).
- Allowing Class 2 e-bikes - with throttles - on trails only if the throttle is not used, as proposed, would create further problems for law enforcement. If a Class 2 e-bike is spotted on a trail, there is no way of telling if the throttle is being used; and so this rule would be totally unenforceable.

- The vast majority of mountain bike trails have been constructed and are maintained with money from grants, and with volunteer labor. Many of those grants are awarded with the understanding that they be used exclusively for non-motorized use. The same is true for volunteers; in many cases they are contributing their efforts explicitly because e-bikes are not allowed. To change the rules after the fact is unfair; there is no good way of refunding the grant money or of reimbursing the volunteers if the trail is changed to allow e-bikes.
- Other user groups - such as hikers and equestrians - have dedicated trails that do not allow e-bikes. Regular mountain bikes and electric-assist bikes are fundamentally different, with different user groups and different trail needs. A proposal to allow e-bikes on all hiking trails would be quickly rejected; yet this proposal would allow e-bikes on all existing MTB trails without any chance for a trail-by-trail determination. If the e-bike community wants new riding opportunities, they are welcome to submit proposals and build trails, just as the hikers and equestrians do.

We would instead recommend a policy that does the following:

- Adds the definition of a "Class 0" e-bike with pedal assist only at a 250 watt power rating. Many bikes are already available in this category.
- Allows only the consideration of Class 0 and Class 1 e-bikes on non-motorized trails. Class 2, Class 3, and any higher power vehicle would continue to be managed as motorized.
- Maintains the status quo of e-bike status on all existing trails.
- Allows the status of an individual trail to be changed only after a complete environmental assessment and public comment period.
- Requires that all new trail construction consider during the EA and comment period whether the trail should be open to Class 0 or Class 1 e-bikes. The determination of whether it be opened to e-bikes needs to be considered on a trail-by-trail basis.

Grand County Trail Mix
Moab, Utah