

Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Kim McCarrel March 18, 2025 02:19 PM

Commenter email (if provided):

kim.mccarrel@gmail.com

Location (if provided): Bend, OR

Public comment:

We have two additional thoughts about the proposed rule permitting e-bikes on all trails where mountain bikes are allowed.

RECKLESS BEHAVIOR

We are concerned that a rule prohibiting reckless behavior while riding an e-bike doesn't go far enough to protect equestrians and hikers, for three reasons.

- 1. Park staff are highly unlikely to be on a given trail at the right time to observe reckless behavior, so this rule is essentially unenforceable.
- 2. The reckless behavior rule is cold comfort if you're a hiker who is injured trying to get off the trail to avoid a speeding e-bike or a rider who is thrown when an e-bike spooks her horse. OPRD's prohibition of reckless behavior notwithstanding, the injured person is still in the hospital.
- 3. Behavior doesn't have to be reckless to put another trail user in jeopardy. Not calling out to another trail user until you are close to them is poor etiquette, but it can't be construed as reckless. And yet it can cause the other trail user to get injured.

To protect equestrians and hikers, e-bikes should be limited to trails 8 feet or wider, the beach, and trails specifically designed for bikes.

WHERE ARE THE GREATEST RISKS TO EQUESTRIAN USERS?

We conducted a park-by-park analysis to see which trail users each park permits. We divided the parks that allow horses into 3 categories: those that separate horse and bike users, those where the proposed e-bike rules won't make a difference to equestrians, and those where all of the park's horse trails are shared with bikes.

- Of Oregon's 257 state parks, natural areas, heritage areas, recreation areas, 21 allow horses.
- Ten parks separate horses and bikes on the trails. These include Bob Straub, Bullards Beach, Cape Blanco, Emigrant Springs, Hat Rock, Milo McIver, Nehalem Bay, South Beach, Tryon Creek, and Willamette Mission. Location matters, of course, if the nearest state park that separates horses

and bikes is 80 miles from your home.

- In six parks, the proposed e-bike rules won't make a significant difference to equestrians, either because their trails are wide so they already allow e-bikes or because horses and bikes share the beach but no other trails. These include the Banks-Vernonia Trail, Del Rey Beach, Deschutes River Trail, Fort Stevens, OC&E Woods Line Trail, and Smith Rock. We included Smith Rock in this category because the horse trails are quite short, the trails are very crowded, and trailer parking is virtually non-existent. Equestrians have already been completely displaced from this park. Allowing e-bikes at Smith Rock won't affect equestrians because they're not there.
- Five parks allow bikes on all the trails where horses are allowed. These include Cottonwood Canyon, Elijah Bristow, Stub Stewart, La Pine, and Silver Falls. Bike use in Cottonwood Canyon and La Pine doesn't pose big risks to equestrians because their terrain is flat, sight lines are good, and usage is light. The other three parks, though, represent significant risks for equestrians. Elijah Bristow, Stub Stewart, and Silver Falls are near major metro areas, so they are likely to see a big influx of e-bike riders. And Stub Stewart and Silver Falls feature trails with significant elevation changes, adding speed to the risks posed by frequent wheeled/non-wheeled encounters.

If OPRD decides to approve the proposed e-bike rules despite our concerns, we would appreciate the opportunity – before the rules go into effect – to work with park officials to identify specific trails at Elijah Bristow, Silver Falls, and Stub Stewart where e-bike use should not be allowed. Once e-bike users are allowed on a multi-use trail, there will be no going back, so it's important that these decisions get made before the rules go into effect.

SUMMARY

The equestrian community would like to modify the proposed rules to allow e-bikes on trails eight feet or wider, on the beach, and on purpose-built mountain bike trails. They should not be allowed on single-track multi-user trails.

If OPRD decides to proceed with the proposed rules, we would like to work with park officials to identify specific trails, especially those at Silver Falls, Stub Stewart, and Elijah Bristow, where e-bike use should be prohibited for the safety and enjoyment of other trail users. Any trail-specific decisions should, of course, be made before the proposed rules are implemented.

Thank you very much for considering our views, and thank you for giving us the opportunity to comment.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

deane roppe March 18, 2025 02:37 PM

Commenter email (if provided):

deaneror@gmail.com

Location (if provided): Brookings, OR

Public comment:

I vote for zero electric bikes on beaches, dunes, or established gravel or asphalt bike/ hiking trails. Use on developed state park roads would be ok with low mph speed limits say less than 12 mph.

1. Personal experience or observations indicate restricted space on trails cannot allow for high speed use, hikers cannot get out of way fast enough.

Casual bikeriders can easily be overtaken, and family groups riding together, with small children may be overcome with quiet overtaking EV bikes.

- 2. Observation on city streets, indicate, attitude of electric bike riders tend to treat sidewalks as their speedy routes, narrowly missing walkers.
- 3. On beach riding should be restricted to daytime hours, helmets required, speed less than 15 mph. Zero access to dunes or beach areas above nirmal high tide line.
- 4. Whatever rules are established, make them easy to understand, included in Oregon DMV license manual and provided at time of any park reservation, with a click off for person making reservation.

With clear understanding that park access will be revoked for any violation.

5. Daytime use only, helmets required.

Thank you.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

K Guy March 18, 2025 03:12 PM

Commenter email (if provided):

kaz0709@gmail.com

Location (if provided): , OR

Public comment:

As a daily hiker on State Park trails with my dog, I am opposed to e-bikes having access to the trails. It is already unsafe when mountain bikes come flying down a narrow (a bit wider than single track) trial, and wider ones, but this will only increase the traffic of bikes that do not follow trail etiquette, that is, bikes aren't top priority - it's hikers, horses than bikes.

We had have many close calls on Honeyman trails and the 804 (which is a wider trail). I am already seeing very wide tire tracks (more than a mountain bike) in Honeyman when they shouldn't be on the trails. I have seen some older folks on the 804 almost get hit by a biker flying down the trail. My brother was one of the three men who re-invented mountain biking in the 1970s, so I am not opposed to bikes, but there are too many irresponsible bikers, and adding this to the trails is a recipe for disaster.

There are no signs on the trails about e-bikes not allowed, and there aren't any signs about trail etiquette. Regardless, people can still ignore it, like they do with the leashed dogs sign, but I would like to see more signs no matter the outcome of this.

Thank you for your consideration.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Donna Mlinek March 18, 2025 04:41 PM

Commenter email (if provided):

donnamlinek@gmail.com

Location (if provided): Florence, OR

Public comment:

I am opposed to any changes that increase the number of trails where e-bikes can be used. E-bikes are motorized vehicles and they are fast and quiet, posing a danger to walkers. I know that regular bikes can also go fast at times, but e-bikes are much heavier and will cause more damage to a pedestrian in the event of a collision. I see many comments on here from seniors who want to have access to trails. I am a senior myself so I am sympathetic to that point of view, but that may be even more reason to restrict where these vehicles can go. Seniors have less strength and slower reflexes and therefore are more likely to be involved in a collision. The downside of increased access for seniors and others with mobility challenges is that many more people will be using those trails on e-bikes, creating more opportunities for collisions. One of the things I love about Oregon is the way they separate users - we have places for horses, places for bicycles, places for hikers and places for OHVs. As a hiker, I move slowly through nature--I don't want to have to be afraid of getting run over. Mixing pedestrian and motor vehicles on trails is a recipe for accidents and injuries. And we all know that rules aren't followed and there isn't enough personnel for enforcement.



Oregon Parks and Recreation Department

Commenter name (if provided):

Date comment received:

Leslie Seeberger

March 18, 2025 08:30 PM

Commenter email (if provided):

muddymuleranch@yahoo.com

Location (if provided): Vernonia, OR

Public comment:

I am a 64 year old equestrian. All my life I have donated hours to make trails, clean trails and pack in equipment to make bridges, and other needed trail supplies. I worked endlessly on the Banks/Vernonia trail. I was promised this trail would be as much for horses as hikers and bike riders. This became a myth very soon. Bike riders speeding by, never slowing. Have witnessed two riding wrecks do to bike riders. With E bikes now totally taking over, hiking is scary, hiking with dogs is dangerous, riding horse suicidal. Even bike riders have had issues with e bike riders.

Equestrian spend thousands of dollars in the Oregon economy, hay, veterinary, farriers, farm stores, events, stables, property tax, ect. What your considering is dangerous to more then just equestrian, you upset wildlife, make it trial unsafe for hikers.

Who is going to rescue e-bike riders when they crash? Who's going to haul out the heavy bikes when they breakdown in the out back? Who's going to pay? Who's going to maintain the trails?

Many people need. Break from noise, from technology, from rudeness. Bikes and horse don't mix well. Bikes, e bikes, hikers, dog walkers, equestrian is nothing but a recipe for disaster.

I beg you do not allow e bikes on trails.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Richard Cramins March 19, 2025 01:46 PM

Commenter email (if provided):

rcramins@outlook.com

Location (if provided): Florence, OR

Public comment:

As soon as you install the motor on a bicycle, it becomes a motorcycle. As such, it should follow the same rules as motorcycles when driven on public roads.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

March 19, 2025 02:27 PM

Commenter email (if provided):

mclouie113@gmail.com

Location (if provided): Florence, OR

Public comment:

Please see my attached public comment in pdf file.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Elaine Karnes March 20, 2025 11:50 AM

Commenter email (if provided):

karnese@peak.org

Location (if provided): , OR

Public comment:

E-bike use should continue to be prohibited on Oregon beaches.

E-bikes frequently are in conflict with wildlife (especially birds, such as the endangered snowy plover, which nests on sandy beaches), children and hikers.

It is not possible to enforce limitations for e-bike users (safety rules, speed limits, use restrictions, expectations for good conduct, etc.) -- especially with recent reduction of Oregon Park and Recreation Department staff. Additionally, as e-bikes have increased in popularity, they are now capable of reaching greater speeds, unlike the bikes of days past; and the OPRD is simply not capable of policing safe practices. When - not if - a child, an elderly person, or anyone walking our beach is injured by one of these motorized vehicles, this is simply a lawsuit (against the state) waiting to happen.

Our beaches are rightly the envy of the nation. Let's not spoil our beaches with this unnecessary change in state law.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Diana Aldridge March 20, 2025 01:11 PM

Commenter email (if provided):

diana.aldridge1551@gmail.com

Location (if provided): Jacksonville, OR

Public comment:

No to e-bikes on trails that have equestrians on them. The quietness spooks horses beyond any safety concerns. The trails equestrians use with hikers (walking) is no problem. Horses can sense the human hiker, We call out to the hikers to let them know we are there, then stop until all acknowledged their presence. E-bikes like motorcycles are just to fast, Motorcycles have their own trails and cannot use the same trails that hikers and equestrians use. E-bikes should at least be regulated to the mountain bike trails. All go fast and are quiet. No place for hikers, kids, dogs and equestrians.

Please use safety in the thought process.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Ke6 Criswell March 20, 2025 07:15 PM

Commenter email (if provided):

sixty8gtcs@aol.com

Location (if provided): Colton, OR

Public comment:

E-bikes should be allowed only on dedicated mountain bike trails and multi-use trails at least 8 feet wide. They should not be allowed on multi-use single-track trails.

I believe the speed of E-bikes will make an even bigger safety concern than a regular mountain bike for equestrians.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Beth Dayton March 20, 2025 07:42 PM

Commenter email (if provided):

bethdayton@comcast.net

Location (if provided): Salem, OR

Public comment:

As the president of the non-profit group Salem Area Trail Alliance I strongly approve of the rules revision. The fact of the matter is that well over half of the bikes currently out on state parks trails are e-bikes already, and where there are problems with high speeds or user incompatibility that is just as likely to be due to analog bikes as e-bikes. The problem is behavior, not technology. The rules against e-bikes on trails are essentially unenforceable as the vast majority of people cannot tell one from the other at a glance, especially with mountain bikes.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Dave Megrath March 20, 2025 08:06 PM

Commenter email (if provided):

davemegr@comcast.net

Location (if provided): Salem, OR

Public comment:

Years ago I was an avid mountain biker, until a heart attack at 48 years. Following that I found that I couldn't make it up a hill on a bike without pegging my heart rate beyond what the cardiologist ordered. Now, nearly twenty years later, I have managed to acquire an ebike a few years ago. However, the current regulations have ebikes still restricted on many of the trails I'd like to ride on. I'm looking forward to the day that will change and I can get back to enjoying he trails like I was once able to. I'm hearing from some of my contemporaries that are still healthy, but because of age no longer have the endurance they used to and are looking toward something that isn't solely pedal powered so they can also remain on the trails.

I look forward to the exercise when riding and so am riding pedal assist. I just need that extra ebike boost when encountering the hills, of which there seem to be many of. From a safety perspective for all trail users, I don't see much of any difference in full pedal versus ebike usage. But the ebike may be what it takes to keep my older generation still on the trails.

Let's keep the public outdoors and healthy!



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Jason Flanagan March 21, 2025 06:22 AM

Commenter email (if provided):

flanaganjason1@comcast.net

Location (if provided): Salem, OR

Public comment:

Class 1 e-bikes should be allowed on park trails. They do not erode the trails any more than a non-assisted mountain bike does. Class 1 e-bikes simply provide motor support so riders can get up hills with less effort. The motor plays very little role on downhill sections. Class 1 e-bikes should absolutely be allowed as they allow more people to enjoy our parks- and see parts of parks that had previously had access limited to the very fit, or other users like equestrians. More people enjoying our parks is a good thing.

Thank you for your time,

Jason Flanagan



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Haley Lebsack March 21, 2025 07:41 AM

Commenter email (if provided):

haley.lebsack@gmail.com

Location (if provided): , OR

Public comment:

As a cyclist and a runner I think there are simply some trails that should not allow ebikes.

- 1. When cycling/running on single track I am not prepared for a bike to come up hill at me at 15-20 miles an hour. And, no matter what speed limit you put on a trail there are many who ride their bikes dangerously fast. If the trail does not allow dirt bikes it should not allow ebikes unless there is easily room for two to pass on the trail.
- 2. I have also assisted e-bikers who have gotten themselves too far from a trailhead and outside of their fitness level/comfort zone because of ebikes.

There is simply no way/no man power to monitor what type of ebikes are being used on a trail. If you allow any type you will see an increase in accidents, injuries, and damaged off-trail areas.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Ryan mclane March 21, 2025 08:09 AM

Commenter email (if provided):

westsidetrailfederation@gmail.com

Location (if provided): , OR

Public comment:

The proposed rule change of a blanket approval to allow motorized assisted bikes on trails where other human-powered bicycles are allowed (unless specifically restricted) is lazy, dangerous and irresponsible. Each application and facility has diversity of use, soil types and risks. Each facility/trail should have a specific risk assessment and conditional approval (or disapproval) by each land manager or facility manager. It's true that E-bikes and their users need a place, so the creation of new trails that address the erosion and uphill speed risks and increased user conflict is necessary. It's now common to see Full-powered electric motorcycles (Suron, etc) on trails that are currently open to Class 2 assist ebike use, with the users claiming that they are riding an "e-bike" and have the right to ride there. Without resources devoted to enforcement, in a few years it'll be the wild-west on our "non-motorized" trails.

Keep the separation between human-powered and motorized where it makes sense, let's not blur the lines between the two. Approve ebike use on trails (where it makes sense) on a conditionalapproval basis.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Jon Gustavson March 21, 2025 11:33 AM

Commenter email (if provided):

jgusta@hotmail.com

Location (if provided): Portland, OR

Public comment:

Yes, I support Class I, pedal assist ebikes at Silver Falls bike trails



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Debbie Tompkins March 21, 2025 01:36 PM

Commenter email (if provided):

mibluetoo@yahoo.com

Location (if provided): , OR

Public comment:

I was told a couple of years ago that I could ride my ebike on the ocean shore by a ranger. I am disabled and there is no other way I could "walk" the beach with my husband. It has been a Godsend for me. I think it should be allowed for the people who need it as long as they are safe and courteous to other beach goers and wildlife.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Ben Stitt March 21, 2025 05:47 PM

Commenter email (if provided):

bdstitt53@gmail.com

Location (if provided): Salem, OR

Public comment:

I ride regularly on the Catamount trail in Silver Falls State Park. This is specifically a mountain biker designed single track trail, that is also open to hikers. My experience on this trail is that most e-bikes are ridden like mini-motorcycles, moving too fast under too high a power. I have been nearly run off the trail many times by this type of rider. These riders should be excluded from single track trails. On the other hand, there are many, primarily older, riders who are on e-bikes who ride them like a pedaled bike, not like a mini-motorcycle. I don't have a problem with them on the trail. I would propose that e-bikes not be allowed on single-track trails, with the exception of older riders, say older than 55 or 60. Park City Utah has this policy, which works well and requires the older riders to get a pass which is displayed on the bike.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Heather S March 22, 2025 06:55 AM

Commenter email (if provided):

hetheryh@gmail.com

Location (if provided): Dayton, OR

Public comment:

The presence of e-bikes on hiking trails poses several challenges that warrant serious consideration. The primary arguments against allowing e-bikes on these trails include safety concerns, environmental impact, and the preservation of the hiking experience. One of the foremost issues with e-bikes on hiking trails is safety. E-bikes can reach speeds significantly higher than traditional bicycles, which can create dangerous situations for hikers and equestrians whose horses can be easily startled by the sudden appearance of an e-bike. The unpredictability, silence and speed of e-bike traffic can lead to accidents. Hikers, especially children, can be focused on the natural surroundings and not anticipate the sudden approach of an e-bike, leading to potential collisions. When a horse hears a soft whirring sound and has no idea what its source is, it can easily panic! E-bikes can be more dangerous than other motorized vehicles on trails due to this fact. There's also the environmental impact of e-bikes on hiking trails. Their use on trails can lead to significant ecological disturbances. The increased traffic from e-bikes can cause soil erosion, damage to vegetation, and disruption of wildlife habitats. Trails that were once serene and undisturbed can become degraded due to the wear and tear from e-bike tires. This degradation not only affects the natural beauty of the area but also threatens the delicate ecosystems that rely on these habitats. By keeping e-bikes off hiking trails, we can better protect the environment and preserve the natural landscapes for future generations. The presence of e-bikes on hiking trails presents significant challenges including safety concerns, environmental impact, and the preservation of the hiking experience. As stewards of our natural spaces, it is our responsibility to ensure that hiking remains a safe, environmentally friendly, and enriching experience for all. By keeping e-bikes off hiking trails, we can protect the trails, hikers and equestrians who cherish them. It is imperative to restrict e-bike access to ensure the safety of all trail users.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Kena Ramsy March 22, 2025 08:12 AM

Commenter email (if provided):

ramsey@rammedia.net

Location (if provided): , OR

Public comment:

I believe it is time to stop invading our forests with electronic devices or at least continue to group said modes of movement together. Motorized vehicles need to stay on the same trails and or roads. The speed with quick they can travel is not consistent t with walkers hikers and equestrians. They move too fast to not present a danger to other on the trail. The noises are quite disruptive to the nature experience and animals. This is also occurring at parks where massive amounts of mountain bikes are taking over such as around Hood River. The Oregon State Parks need to evaluate the land they have acquired and the living creatures who call it home as well as those wanting to access it.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Jim O'Brien March 22, 2025 09:22 AM

Commenter email (if provided):

jimoscarbrien@gmail.com

Location (if provided): , OR

Public comment:

Just like any motor vehicle, Electric Bikes can be dangerous especially in the hands of children and reckless adults. I've seen them speed, unsafely pass vehicles on the right and in general have no consideration for other vehicles. They should be required to follow all motor vehicle (Motor Cycle) laws!



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Bruce Douglas March 22, 2025 12:40 PM

Commenter email (if provided):

brucecamerondouglas@gmail.com

Location (if provided): Tillamook, OR

Public comment:

Peddle-assisted ebikes should be treated the same as ordinary bicycles (geared and single speed). If it doesn't have a throttle, and has to be peddled to move, they are essentially the same. As for any concern about speed, that's already an issue with regular bicycles, and has to do with a lack of manners.

With our aging population, ebikes are going to be more common, and a good way to keep active.

Treating ebikes and bicycles the same just makes sense and time has come. It also may encourage ebikes ownership, and general use.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Bonnie Depriest March 22, 2025 02:57 PM

Commenter email (if provided):

bonniedepriest@yahoo.com

Location (if provided): Woodburn, OR

Public comment:

E bikes are essentially motorized vehicles and should not be allowed on horse trails.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Susan Turner March 22, 2025 04:55 PM

Commenter email (if provided):

suefluffy@gmail.com

Location (if provided): , OR

Public comment:

As an equestrian, I oppose this amendment to allow e-bikes on all trails where other bikes are currently allowed. Speed is a dangerous addition for mixed-use trails and, unfortunately, there are always e-bike riders who engage in reckless behavior and not enough rangers to enforce the rules.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

Renee Glass March 23, 2025 08:26 AM

Commenter email (if provided):

wanabfarms@att.net

Location (if provided): Aumsville, OR

Public comment:

As an equestrian who has helped to build and maintain many of the state and national park trails the speed and quietness of E-bikes are a hazard to all. Particularly on single track trails add to that the ignorance of most bicyclist of horses unpredictably when spooked specifically by un-natural things. Example: they somehow just know not to be afraid of deer by bikes are a different story. I just think it would be much safer for everyone if they were limited to motorcycle pathways and/or 8' trails.



Oregon Parks and Recreation Department

Commenter name (if provided): Date comment received:

G Ankofski March 23, 2025 10:58 AM

Commenter email (if provided):

shutup086@yahoo.com

Location (if provided): Oregon City, OR

Public comment:

I own both regular analog mountain bikes and a Class 1 eMTB. There is no extra "wear and tear" on the trails with Class 1 ebikes as you still have to pedal. It's Class 2 and 3 bikes that would be a problem as they have a throttle and can far exceed 20 mph which is the limit on Class 1 e bikes. I see no reason at all to restrict Class 1 bikes on Oregon trails, I'm 61 years young with asthma and if it weren't for Class 1 eMTB's, I simply wouldn't be enjoying the outdoors as much!!!