



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

KATHERYN CARNAHAN

Date comment received:

March 24, 2025 11:22 AM

Commenter email (if provided):

katheryn.carnahan@gmail.com

Location (if provided): EUGENE, OR

Public comment:

Hello,

I would like to caution the committee against allowing E-assisted bicycles in State Parks where there is equestrian activity. I am a horse-back rider and horses can spook easily while on trail. The speed at which E-assisted bicycles move make this even more likely. When a horse spooks, there is a strong possibility of the rider coming off the horse. This is an matter of safety for riders: a fall off a horse can lead to serious injury and in some cases, death.

I ride at Elijah Bristow State Park which is a high equestrian-use area. I strongly urge the committee to not allow E-bikes for everyone's safety.

Thank you,

Katheryn Carnahan



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

terrance hawley

Date comment received:

March 24, 2025 09:54 PM

Commenter email (if provided):

cand3ts@gmail.com

Location (if provided): Silverton, OR

Public comment:

Pedal assist bikes have improved the lives of thousands of young, middle age and retired folks. I strongly support OPRD and the use of e-bikes on their lands. E-bikes play an essential role in expanding the accessibility of remote areas without changing the aesthetic of our beautiful wild places.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Holly Swanson

Date comment received:

March 25, 2025 09:55 PM

Commenter email (if provided):

hollyswanson64@gmail.com

Location (if provided): Tigard, OR, USA, OR

Public comment:

I am very concerned about the prospect of allowing E bikes on the same trails that are open to Horseback riders. E bikes are very quiet and can travel at very high speeds. Horses are prey animals, and the position of their eyes being on the sides of their head, mean that they have trouble seeing things behind or directly in front of them. As a prey animal, their natural instinct is to flee from perceived danger. They can often overreact to the sudden presence of a fast-moving object that they did not hear or see. This is most often the case when a bike rider approaches from behind a horse or even approaches from the front at high speeds. Even the best trained and exposed horse can get spooked at things it does not expect or recognize. If the horse gets spooked, it can unseat its rider, accidentally step on, roll on or crush its rider, kick out at the passing cyclist, or roll down a hill with its rider if the trail is narrow and has a steep side decline. All of these reactions can result in serious injury or death to the rider and or the cyclist in question. At least with a regular bike that is not electric, there is the (small) chance that a horse can hear the bike. Not all cyclists are aware of how they should act when they encounter a horse. And of course, some who do know what to do choose not to do it. The best way to act when approaching a horse is to VERBALLY announce yourself whether approaching from behind or in front. Some horses have never seen a person on a bike and have no idea what "the strange" creature is! It doesnt always associate that there is a human on a bike. Please keep the trails for the use of equestrians, hikers, walkers and respectful manual bikes.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Justin Soares

Date comment received:

March 26, 2025 05:50 AM

Commenter email (if provided):

greaseworks@gmail.com

Location (if provided): Corvallis, OR

Public comment:

I am a middle aged person who has ridden over 5000miles on my two e-bikes over the last few years. I'm also a former trail runner who disparaged any bikes at all on trails in my early 20's—they disturbed my peace, they tore up the trail, they put me at risk, etc. This was 1998-2002, well before the era of e-bikes. But sadly I lost my ability to run or even hike mountain trails when I was diagnosed with **MS** at 21. I am very active family man with two daughters but I can hardly walk a city block without risk of falling.

Pedal assist Class 1 bikes (**20mph max assistance speed**) are a godsend for partially disabled but active/healthy people like myself, trying their best to keep moving and stay fit/limber to forestall the advancement of a **chronic progressive crippling brain disease** like Multiple Sclerosis. Respect by and for all trail users, hikers, Equestrian, etc.—able bodied and disabled—is paramount to maintaining both the enjoyment and equality in all of the state parks in Oregon, which all people should be able to recreate in and enjoy equally.

Many comments here are myopic and only looking at this from a narrow ableist perspective. I would like you to consider this alternative perspective from those of us who also enjoy these parks, pay taxes here in Oregon, are part of their community, love nature, trails, beach and mountains as much as you and should have equal rights to use Oregon state parks, the beach, etc.—with their e-wheelchairs or pedal assist e-bikes.

I believe the ADA applies here in Oregon as much as any other state—as much as horse saddles and stirrups are available throughout this (former;) great land.

Regards,
Justin



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

David Overman

Date comment received:

March 26, 2025 09:43 AM

Commenter email (if provided):

doverman007@comcast.net

Location (if provided): Vancouver, WA

Public comment:

Hello, as an older person who uses his emtb almost exclusively it would be amazing to ride my emtb without feeling like a criminal. I need the emtb to ride due to old people injuries and my age. Please do expand the rules to allow emtb on trails where currently they are banned. Thank you!!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Justine Knott

Date comment received:

March 26, 2025 02:24 PM

Commenter email (if provided):

jknott07@yahoo.com

Location (if provided): Salem, OR

Public comment:

Please keep e bikes off trails used by equestrian riders. The noise can startle the horse and can cause a deadly accident to rider or biker.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Brad Stewart

Date comment received:

March 26, 2025 06:58 PM

Commenter email (if provided):

bradstew54@fastmail.us

Location (if provided): Eugene, OR

Public comment:

I support allowing ebikes anywhere mountain bikes are allowed.

E-bikes classifications as per ORS 801.258 is somewhat limited. It defines Class 1,2, and 3 but leaves out the details. As I understand it, class 1 does not have a throttle whereas Class 2 and 3 have throttles and are limited to a top speed of 20 and 28 MPH respectively. All have pedal assist. Any of them can be modified quite easily by entering in special codes, so it is very difficult, if not impossible to enforce rules that specify a Class.

It's

also not clear whether or not this is under power on a flat level surface. It is easy to exceed 20 MPH speeds on a regular bike, especially when going downhill.

The remaining definitions in ORS 801.258 appear to be accurate and reasonable.

Ebikes

should be allowed anywhere a regular mountain bike is allowed. But limit speed to 10 or 20 MPH. A 1 KW motor will have difficulty propelling a rider to that speed on most up-hill routes. Typical ebike uphill speed is 5MPH and does require sufficient input using the pedals. High speed down hill excursions are the same for either a standard mountain bike or ebike. I've had mountain bikers pass me going down a slight decline.

To those citizens concerned about scaring horses, the rules should apply equally to both ebikes and non ebikes. Both are relatively silent and travel at similar speeds on many parts of the trails especially down hill. Either can spook a horse. Either allow both types, or ban both types. Please do not differentiate the two.

I would also require the use of a helmet, a headlight, and a signalling device such as a bell to alert hikers and equestrians when approaching them from behind or in front. I would also post rules of etiquette for riding both mountain and ebikes on public lands.

The problem I see with rules that are a bit restrictive is the propensity of "Karens" to intimidate folks like myself who just want to enjoy nature while respecting other users. Please post the rules and restrictions for all to see.

Finally, there are some specialized ebikes with three wheels that are designed to accommodate a handicapped person--an electric off-road wheel chair, if you will. These should be allowed on trails that may be off-limits to normal mountain bikes and ebikes as long as it's safe and wide enough to accommodate the user.

Another possibility is a requirement to purchase a permit similar to the ATV permit required for motorcycles and quads. Or simply require the OR ATV permit for using ebikes in the parks. The \$10 fee is reasonable and helps maintain the trails. Using the existing OR ATV permit infrastructure should be easy and inexpensive to implement. As with the existing OR ATV, a booklet and test is required. The test would educate users about proper use, maintenance, and road courtesy.

Thank you for the opportunity to comment. I am 71 years old and a courteous ebiker. An ebike has kept me fit and brings back the joy I had when I was a child. I use it regularly for commuting in Eugene.

Brad Stewart



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Keith McLaughlin

Date comment received:

March 26, 2025 09:56 PM

Commenter email (if provided):

wermcfamily@gmail.com

Location (if provided): Lebanon, OR

Public comment:

I strogly agree with these proposed changes that provide access for all riders. E-bikes provide access to all riders to our amazing state parks. Thanks!!!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Rachel Fussell

Date comment received:

March 28, 2025 04:43 PM

Commenter email (if provided):

rachel@peopleforbikes.org

Location (if provided): Boulder, CO**Public comment:**

On behalf of PeopleForBikes, I am writing in response to the Electric-Assisted Bicycle Regulations draft policy for the Oregon Parks and Recreation Department (OPRD). We applaud your work to modernize electric bicycle access in state parks and beaches in Oregon, and we seek to partner and provide advice where appropriate.

PeopleForBikes supports the allowance of Class 1 electric-assisted bicycles on non-motorized, natural surface trails managed by OPRD wherever traditional bicycles are already allowed. This policy would harmonize state land management policies with the actual products that people are riding, proactively manage the desired experiences of electric bicycle riders, and provide for their safe operation, consistent regulation, and reasonable use. We support allowing e-assisted bikes on all other trails, roads, paths, and wet sand/ocean shore state recreation areas. Additionally, we are supportive of language to expand the allowable use of devices by persons with mobility disabilities.

The PeopleForBikes Coalition is the national advocacy group that works for better policies and infrastructure for bike riding. We are also the sole national industry association for manufacturers, suppliers, and distributors of bicycle products, including electric bicycles. Our work to make bike riding a safer and more inclusive activity for everyone, including electric bicycle riders, is supported by 13,275 individuals in Oregon. Our organization has led national efforts to modernize and standardize electric bicycle regulation, educate users, and improve research.

Pedal-assist Class 1 electric bicycles are an emerging technology that makes the activity of biking and trail riding more accessible and enjoyable to users with different levels of experience, skill, and physical ability. Class 1 electric-assist bicycles look, are equipped, and ride like traditional bicycles and simply give riders – regardless of age, physical, or cognitive ability – an extra assist while pedaling. When introduced on- or off-road, studies have shown that there appear to be minimal conflicts between Class 1 pedal-assist bicycle riders

and other user groups, with no material safety distinctions between Class 1 electric-assist and conventional bicycle use.

Related to safety and speed, Class 1 electric-assist bicycles have been shown to travel at similar speeds to bicycles and should be regulated as traditional bicycles. They have been demonstrated to travel at average speeds within two miles per hour of traditional bicycles, with the faster speeds typically occurring in uphill areas. Additionally, studies show there is no difference in how riders of electric bicycles and conventional bicycles comply with traffic laws or their safety and crash risks with other trail users. Electric bicycles are also proven to provide substantial health benefits to riders. In short, electric bicycles have significant value to your constituents, and they can be an asset to the Oregon community.

Existing research from the USDA Forest Service and the East Zone Connectivity and Restoration Project in Tahoe National Forest indicates that pedal-assist Class 1 electric bicycles can be successfully incorporated into trails with non-motorized uses. Included in the East Zone Connectivity's final decision notice was the designation of 35 miles of existing non-motorized trails as open for Class 1 pedal-assist mountain bikes. With the introduction of Class 1 electric-assist mountain bikes on natural surface trails where mountain bikes are already allowed in the East Zone, staff found that they do not significantly alter public enjoyment or affect the patterns of use on those trails. In most places, traditional mountain bikes and Class 1 electric-assist bicycles have similar effects on the physical trails and public use patterns.

Based on the findings from the East Zone Connectivity Project, the Tahoe National Forest also completed a NEPA Environmental Assessment for the Pines to Mines Project, which opened access to 72 miles of singletrack trails for Class 1 electric mountain bikes where traditional mountain bikes are already allowed. As noted in the final decision notice for the Environment Assessment for the Pines to Mines Trail Project (which included a Finding of No Significant Impact), the impacts to trail tread and speed differentials were not shown to be affected by Class 1 electric bicycles compared to analog mountain bikes:

“Effects on trails are not considered to be significantly different between traditional mountain bikes and Class 1-E-Bikes. Their equipment components are similar including wheel size, tire tread, gearing, chain, brakes, and gear shifting mechanisms. Impacts on trails in terms of tread wear, soil movement, erosion, and contribution to sediment delivery have also been shown to be similar (Wilson and Seney 1994; Weaver and Dale 1978; IMBA 2015). Finally, a review of the literature, consideration of current user trends, and USFS observations of use characteristics during the 2019 season when Class 1 E-Bikes were allowed on all non-motorized trails in the forest determined there are no significant differences between the two vehicle classes with respect to relative speeds (Langford et al. 2015; TNF Unpublished 2020) and user behavior (Langford et al. 2015).”

Examples of communities and government agencies that have undertaken significant studies of electric bicycle impacts, rider behavior, perceptions, safety, etc., from other user groups are attached in our full letter, uploaded to the Oregon.gov website during public comment submissions.

Americans will continue to purchase electric bicycles and bring them to state lands for use well into the future. Therefore, it is critical that OPRD has sensible, consistent, fair, and realistic policies to guide this growing use. We encourage you to consider the benefits of Class 1 electric-assist bicycles on OPRD non-

motorized, natural surface trails and electric-assist bicycles on Oregon's paths, roads, and ocean shore state recreation areas. Furthermore, we are supportive of expanding the language to open areas for use by pedestrians and bicycles to persons with mobility disabilities, allowing for wheelchairs and manually powered mobility aids, as well as OPDMDs.

We welcome the opportunity to provide any further information and appreciate the chance to share our resources and knowledge.

Sincerely,

Rachel Fussell

PeopleForBikes



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Josh Snyder

Date comment received:

March 28, 2025 07:04 PM

Commenter email (if provided):

llsnyderj@gmail.com

Location (if provided): Corvallis, OR

Public comment:

I am a very active cyclist and I ride many bikes, including E-bikes. I find it very helpful for training on recovery days. I don't understand why we would segregate one bike over another, seems very odd to me. Makes about the same sense as saying no Electric phones in the forest. I have friends that have pace-makers and the only way they can ride is via E-bike. Seems horrible to tell them because their heart is not strong enough they cannot ride a bike and enjoy their favorite hobby! My class 1 bike is not any faster than any of my other bikes and it only weighs around 6 lbs more so I don't see why they would be segregated. Are they going to outlaw electronic shifting next? just doesn't make any sense...



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Tobbi Countryman

Date comment received:

March 29, 2025 04:54 PM

Commenter email (if provided):

Tobbiann2@gmail.com

Location (if provided): Mulino, OR

Public comment:

Why on Earth are you even considering allowing A Moterised Vehicle on public trails?? Yes They Are Moterised, Electric Bikes are a two wheeled or 3 wheeled Electric Vehicle and should NOT BE ALLOWED on the State Parks Single Track Trails where pedestrian and Equines and other Bicycles are already sharing the space. It's Dangerous! Those Electric Bikes on a flat level tred can reach speeds exceeding 30 mph per hr!!! Add a incline and your reaching speeds of 40 plus MPH!!! Then add a pedestrian and an Equestrian that can not hear that E-Bike coming and Rocket speeds compared to the horse and pedestrian and your looking at Not just minor injuries your looking at Death!!! I personally have had surprised encounters with Regular Bikes At Stub Stewart Sate Park and I will NO LONGER RIDE MY HORSE THERE!!! STATE PARKS NEED TO PAY ATTENTION TO FEDERAL RULES AND THE ONE TIME THEY MADE AN TRIAL EXCEPTION TO ALLOW MT BIKES ON SINGLE TRED TRAILS . THEY REVOKED THE DECISION TO ALLOW DUE TO THE DANGEROUS CONSEQUENCES!!!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Melanie Kate-Mason

Date comment received:

March 29, 2025 09:04 PM

Commenter email (if provided):

bluefairypress@yahoo.com

Location (if provided): Eugene, OR

Public comment:

PLEASE do NOT allow E Bikes on our State Parks trails!! I am an equestrian and have encountered these vehicles on our trails with nearly disastrous consequences. We encountered a "hover board" and another time at a blind bend in the trail with a 3 wheeled e-bike which scared the living daylights out of my horse who nearly spun around at a 180 to run back away from the bikes. I came very close to being unseated and dumped. The other riders had similar reactions with their horses as well.

Horses are prey animals and users on our trails with these silent vehicles are a safety hazard. Horses and tax paying equestrians have very few trails to use and particularly our State Parks that are designated for horse use should not include e-bikes, while keeping in mind future equestrian trails as well. We have very FEW trails to use with horses and this is a BIG SAFETY issue. Oregon has approximately 135,000 horses, with an active community of volunteer equestrians who contribute time and money for public land maintenance. The users of these bikes have other options.

Thank you for considering NO E BIKES in State Parks.

Thank you,
Melanie Kate-Mason



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Laurie Kinder

Date comment received:

March 30, 2025 09:30 AM

Commenter email (if provided):

kinderlaurielynn@gmail.com

Location (if provided): Eugene, OR

Public comment:

Hello, my experience with e bikes is that they go too fast and aren't considerate of dogs, young kids, and can spook wildlife such as herds of deer and elk. I am also an equestrian and when bikes come upon quickly and without consideration the horses can spook, double barrel kick the e-bike rider or worse. They are noisy and heavy, they would do considerable Damage to wet trails. I ask that they be banned from parks as consideration for all visitors.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Nola Nelson

Date comment received:

March 30, 2025 11:14 AM

Commenter email (if provided):

nolagnelson@yahoo.com

Location (if provided): Cottage Grove, OR

Public comment:

I hike regularly on all types of terrain in Oregon, and have had numerous unpleasant encounters with bicyclists riding too fast around blind corners and down steep grades, passing too close without warning, performing stunts, etc. No amount of admonition about safety and courtesy will change their sense of entitlement. The danger they pose to trail users has increased with the popularity of heavier, faster vehicles being ridden like motorcycles.

I can accept the proposed rules for Class 1 ebikes with a top speed of 20 MPH and motor assist only while being pedaled. There will still be reckless, heedless behavior typical of our culture, but for some riders, they are a way to enjoy areas already open to standard bicycles.

I do not believe that Class 2 or Class 3 ebikes belong on trails and beaches currently restricted to equestrians, pedestrians, and non-motorized bicycles. They are essentially motorcycles and should be treated as such.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Flaxen Conway

Date comment received:

March 30, 2025 01:51 PM

Commenter email (if provided):

flaxen.conway@oregonstate.edu

Location (if provided): Philomath, OR

Public comment:

As an avid hiker in the Willamette valley and beyond in Oregon, I do not think that e-bikes of any sort should be allowed on trails less than 8 feet wide (certainly not on single track trails). There are potential safety issues for hikers, walkers, equestrians, trail bikers, and more. Specifically:

- There would be increased trail use resulting in wear and tear on trails (destruction of the trail/environment).
- There would be increased and/or dangerous user conflicts, and negative impacts on wildlife and natural resources.
- E-bikes on trails would detract from the experience of being in nature without mechanized civilization (i.e., crowding, impact on birds and other wildlife, etc.). Especially, there would be an increase in artificial noise level which is not wanted by those of us who are out hiking for the "natural" and/or "spiritual" experience.
- E-bikes are considered motor vehicles and should not be allowed on trails that designated for pedestrians, equestrians, and bikers.

All that said, I am aware of and supportive of differently-able people having the right to experience these wonderful places. For this reason, maybe there could be a limited number of trails/places in Oregon -- or specific NEW TRAILS CREATED -- where E-bikes ridden by THESE RIDERS would be permitted. But this approach would have to be pilot tested, monitored and evaluated.

Thank you for your time and consideration.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Charlie Johann

Date comment received:

March 31, 2025 10:07 AM

Commenter email (if provided):

charlie.johann20@gmail.com

Location (if provided): Eugene, OR

Public comment:

E bikes have proven to not increase damage to trails and the environment while getting more people outside which is a good thing as it increases funding for state parks and increases care/awareness for these previous natural resources.

If you are looking for studies examining the impacts of E Bikes I encourage you to look into the Analysis of 2020-2019 Twin Buttes Electric Motorized Mountain Bicycle (eMTB) Trial Period in Durango Colorado. The study has been attached as an additional p[ublic comment.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Mike Totey

Date comment received:

March 31, 2025 11:41 AM

Commenter email (if provided):

mtotey@oregonhunters.org

Location (if provided): Medford, OR

Public comment:

See attached document please.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lisa Rudler

Date comment received:

March 31, 2025 07:14 PM

Commenter email (if provided):

lisafjords18@gmail.com

Location (if provided): Eugene, OR

Public comment:

E-Bikes are a marvelous invention and do have a place in our society. They are great transportation around town and are in some cases more economical option than a car for some people.

However, they are not appropriate to be ridden in a park that is used primarily by Equines like Elijah Bristow. Hikers also enjoy walking at Elijah Bristow and do not mind crossing paths with equine riders. Often times hikers enjoy seeing the riders and Equines. Both sets often stop to chat about their hike or ride. Hikers get to admire the horses and learn a bit about them. Riders are always eager to share their knowledge about their horses.

It's simply a symbiotic relationship.

E-bikes traveling up to 20mph will be unable to be a part of this symbiotic relationship. They also pose a greater risk of injury and severe accidents to hikers, riders, and the horses. Can you imagine a pack of group of E-bike riders coming around one of the many curves and bends at Elijah Bristow, running into a pack of horses and riders? Those E-Bikes make very little noise as the speeds they can reach, you're looking at a disaster!

I support E-Bikes. I don't support E-Bikes at Elijah Bristow or any other horse park. People can ride their E-Bikes anywhere else, the surrounding streets, etc. It is complete nonsense to open up a dedicated Equine/Hiking Park to them as well. Especially when they have so many other places to ride that horses can't be ridden.

Do not allow E-Bikes to infest our Equine Parks and Elijah Bristow specifically. It's dangerous and selfish. Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Emily Elias

Date comment received:

April 1, 2025 08:14 AM

Commenter email (if provided):

emshorses@gmail.com

Location (if provided): Eugene, OR

Public comment:

Dear public,

I am a horseback rider and member of Backcountry Horsemen of Oregon , Emerald Empire chapter of the Eugene area. Elijah Bristow Park and Mt Pisgah are the local public parks we used regularly . I enjoy sharing the trails with responsible users. However, I have found that the faster a user can go the less responsible they can be . Sharing a trail with slow moving hikers and even bikers has never caused a problem for me and my horses . Electric bikes provide a way for users to go faster and thus causing possible interactions that would be harmful to all parties involved . I use horses to get out in nature as my hiking days are behind me . I see that electric bikes can also provide that for folks of a certain age such as me. I worry about the younger set who is focused on speed and thrill vs visiting nature . So yes allow e-bikes where appropriate and not mixed with the slower moving nature seeking crowds .