



Sarah Fitzgerald
Recreation Program Manager
Spokane County Parks, Recreation & Golf
404 N Havana Street
Spokane, WA 99202

Dear Recreation Program Manager Sarah Fitzgerald,

In response to your department's recent solicitation of public input on electric bicycle management on natural surface trails, I am writing to encourage the definition of the three classes of electric bicycles within Section 6.14.030 of Spokane County Parks' regulations, and allow Class 1 electric bicycle access on non-motorized and natural surface trails wherever bikes are allowed.¹ We would like to offer our resources to you as you consider such changes to your current policy.

PeopleForBikes is the national bicycling advocacy group that works for better policies and infrastructure for bike riding. We strive to make bike riding a safer and more inclusive activity for everyone, including our 40,000 individual supporters in Washington. We engage with land managers across the country to help develop electric bicycle policies that reflect the needs of their local communities.

The results from your recent electric bicycle survey demonstrate local support for Class 1 electric bicycle access on natural surface trails.² The adoption of this policy would be a fair and sensible decision, as Class 1 electric bicycles are similar to traditional bicycles and simply give riders – regardless of age, or physical, or cognitive ability – an extra boost when riding. The three-class system of electric bicycles has already been defined in 28 states' motor vehicle codes (including Washington³) and six states' park codes (Colorado, Florida, Idaho, Utah, Virginia and Wyoming) due to the clarity it provides when regulating the use of electric bicycles.

Electric bicycle use is rapidly growing. No studies or instances have shown that this modern outdoor experience decreases public safety or causes increased trail impacts as compared to bicycles. Additionally, when electric bicycles are introduced on shared-use paths, there are minimal conflicts between trail users, no observed crashes and generally safe passing. For additional information on these studies, please see page two of this letter.

For six years, PeopleForBikes has worked with agencies across the country to provide assistance as they transition their regulations to be more inclusive of electric bicycles. We strongly believe that successful electric bicycle policies are ones that are deployed with educational materials on trail etiquette. The resources that we have developed to assist with this transition include:

- A draft electric bicycle regulation for non-motorized and natural surface trails.
- An informational guide in understanding and conducting an electric bicycle pilot program.
- An electric bicycle trail etiquette guide.
- An overview of U.S. state park electric bicycle policies for non-motorized and natural surface trails.
- A land manager handbook, a resource for the planning and management of electric mountain bike trails.

We would be happy to share any of these materials with you via mail, and you can also find them at peopleforbikes.org/ebikes.

I welcome the opportunity to provide any further information and appreciate your time and service.

Sincerely,

Morgan Lommele
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¹ [Spokane County Parks Regulations](#)

² [Spokane County Parks, Recreation & Golf Electric Bicycle Survey Results \(2020\)](#)

³ [Washington's Electric Bicycle Law](#)

Additional Information on Electric Bicycle Speed, Safety and Studies

Electric bicycle travel at bike-like speeds.

- a. Public sentiment that electric bicycles jeopardize safety and someone's enjoyment on a pathway, travel on average 20 – 28 mph or will cause accidents, is anecdotal, subjective and unsubstantiated.
- b. Class 1 electric bicycles have a motor that cuts off after the rider reaches 20mph. This is not the average speed. On flat and uphill surfaces, electric bicycles travel on average 2-3 mph faster than traditional bicycles (i.e. around 13-14 mph). Five studies exist that show that electric bicycles do not travel significantly faster than regular bicycles and in some instances, are slower, depending on the location and the rider.
- c. Electric bicycle users are like most people and choose to respect the law of the road and be kind to others with whom they share public resources, and would respond more favorably to restrictions on use rather than an outright ban.
- d. The typical rider is 45 – 65 years old and generally uninterested in reaching high speeds or passing other trail users without proper warning or slowing down.
- e. Recreational or competitive cyclists frequently pass electric bicycle riders.

An electric bicycle ban will not decrease ridership, only complicate enforcement.

- a. In 2019, electric bicycles sales grew by 75%. Ridership and engagement is increasing, and people are using electric bicycles to replace vehicle trips and augment existing bicycle trips.
- b. Electric bicycles will be increasingly difficult to distinguish from traditional bikes. Manufacturers label the bikes by class.
- c. As with any vehicle or consumer product, responsible use and riding rests on the user. If public safety is a concern, proper education and enforcement should be implemented.

There are two examples of progressive electric bicycle laws and ordinances that could inform your department's management of electric bicycles.

Jefferson County Study (2017)

- a. *Overview:* Jefferson County, Colo. is currently conducting two studies at multiple parks to gain a better understanding of visitors' knowledge, perceptions and concerns related to the use of electric bicycles on urban pathways and natural surface trails. Through 'Test Ride Surveys,' visitors are asked four questions before and after riding an electric bicycle to determine familiarity with electric bicycles and any changes in perception and/or acceptance after riding one. Through 'Visitor Intercept Surveys,' random park visitors are asked about their perceptions, acceptance, and concerns related to electric bicycles on trails, as well as their ability to detect an electric bicycle sharing the pathway with them.
- b. *Rationale:* Jefferson County realizes that electric bicycles are already in use on its pathways and trails, and that usage will not significantly decrease with a wholesale ban. It has opted to study the issue and engage park visitors to determine whether to allow or prohibit this technology on the transportation and recreation corridors under its jurisdiction.
- c. *Results:* Results show that 67% of park visitors changed their perception of electric bicycles after a test ride (toward acceptance), and 71% of park visitors did not detect the presence of a class 1 electric bicycle on the trail with them. In other words, trying out an electric bicycle increased a person's acceptance and reduced their uncertainty around electric bicycles, and potential concerns around speed and safety are hypothetical, as most users do not realize they are sharing the trail with an electric bicycle.

Boulder Pilot Project (2014)

- a. *Overview:* In 2014 in Boulder, Colo., local ordinance 7491 excluded electric bicycles from the definition of a motor vehicle and authorized their use on city bikeways after a year-long pilot project on multi-use paths. The pilot project evaluated both electric bicycles and non-motorized bicyclists; speed, volume, and gender of electric bicycle riders; and interactions between multi-use path users. Evaluation methods included observing modal traffic volume, vehicle speeds, and collision experience; making field observations; conducting intercept surveys, bike and walk audits and focus groups; and hosting a community feedback panel.
- b. *Rationale:* The Boulder City Council approved this pilot project and later on the ordinance because it believed that it would help reach Boulder's goal of at least 15% of all trips being made by bicycle, and that allowing electric bicycles on bikeways (in addition to on-street bicycle lanes) would encourage more people – especially those with physical limitations – to get out of their cars.
- c. *Results:* On Boulder bikeways, the observational study reported minimal "conflicts" between trail users, no observed crashes, no negative verbal interactions, most users passing with 1' - 2' of buffer space, and less than 1% of users experiencing "hard breaking" interactions. Looking specifically at electric bicycles, less than 1% of all cyclists were riding an electric bicycle, they were only seen on the Boulder Creek Path on weekends, riders were wearing casual clothing and not riding in a group, and their recorded speed was below the 15mph speed limit.