



April 9, 2025

Trails Subcommittee
OCParks
13042 Old Myford Road
Irvine, CA 92602

Sent VIA EMAIL: Admin.TrailsSubcommittee@OCParks.com

The Orange County Chapter of the California Native Plant Society (OCCNPS) has long had an interest in the study and conservation of the region's wildland plants, as well the access to our wildlands and native plant flora for all to enjoy.

OCCNPS is opposed to changes to OCParks trails policy of restricting e-bike use in its Regional and Wilderness Parks. We urge OCParks to continue to prohibit all e-bike classes on all OC Parks regional and wilderness unpaved surfaces. OCCNPS has provided similar comments to the Trails Subcommittee and OCParks in the past, opposing e-bike access, when this topic was previously debated. This is a contentious issue and we can appreciate all perspectives. Many of our members are trail riders themselves.

While we strongly support public access to our county's wildland spaces, we also must balance this access with the natural resources that make these spaces so desirable to the public and biologically important for our native plants and animals.

OCCNPS' specific concerns and justifications for continued prohibition of e-bikes on non-paved OCParks surfaces are:

- **USFS Wilderness areas do not permit bicycle use of any type.** Other USFS lands (Cleveland National Forest, Trabuco District) only permit e-bike use on forest roads and trails permitted for motorized vehicles. CA State Parks, for the most part, do not permit e-bikes on non paved surfaces (although individual parks may provide occasional local exceptions). OC Parks should consider the policies of these other local public lands and consider the importance of consistency across various lands, many of which abut one another.
- **A significant lack of enforcement of current bicycle use on OC Parks trails.** In 2021, information was requested through the Public Information Act of all trail use infractions at OC Parks over the prior five year period. The results were discouraging. Considering the tens of thousands of users annually, enforcement actions were almost imperceptible, totaling less than twenty, and those being mostly dogs off-leash. As

frequent trail users, our members can attest that there is essentially no trail enforcement currently. Given this extreme lack of trail use enforcement, e-bike use would permit added trail use with an even greater need for enforcement, which is inconsistent with current OCParks practices of capacity.

- **Bicycle, hiker, and equestrian conflicts and accidents on trails are a growing concern.** Increased frequency and the addition of e-bikes would exacerbate this issue.
- **Off-trail travel and the creation of unpermitted "use-trails" is a growing issue in all wildland areas.** This presents a strain on management resources. Additional bicycle volume will exacerbate this concern.
- **Off-trail travel from cyclists impacts native plant populations** through trampling, illegal brush cutting, additional erosion, compaction of native vegetation's roots, and other impacts.
- **Entry and/or parking fees are required at most OCParks regional and wilderness parks,** either on a day-use manner or via an annual pass. Hikers are usually more-or-less obligated to pay these fees, while bicycle users often park off-site and cycle in, not paying use fees to the parks and thereby adding additional strain to already limited OCParks resources and rules enforcement. Without enforcement, as mentioned above, this presents a perhaps unintended preference to bicycle users over hikers.
- **Soil erosion from bicycle travel is documented as a higher impact than foot traffic.** Soil erosion negatively affects habitat for many native plant species. High bicycle use widens trails and compacts existing vegetative root systems.
- **Invasive plants are one of the most significant threats to local biodiversity and environmental health.** Invasive plants are expensive to manage and a burden that the County must bear. Invasive plants usually initially establish in wildland areas along disturbed trailsides and staging areas. In addition, seed propagules of invasive plant species are commonly dispersed to new areas through bicycle tires and equipment.

OCCNPS urges the Trails Subcommittee and OCParks to continue its current trail use policies and prohibit all e-bike classes on all OC Parks regional and wilderness unpaved surfaces.

Sincerely,



Elizabeth Wallace
President
OCCNPS



Elizabeth Taylor
Conservation Chair
OCCNPS