

May 12, 2021

Commissioner Jim Montgomery
Massachusetts Department of Conservation and Recreation
251 Causeway Street, 9th Floor
Boston, MA 02114

RE: Policy recommendation on proposed amendments to DCR electric bicycle regulations, submitted to the Department of Conservation and Recreation by various Friends groups

Dear Commissioner Montgomery:

We (the Southwest Corridor Park Management Advisory Committee - "PMAC") are writing to share our experience and thoughts about an anticipated amendment to regulations, which would treat Class 1 electric bicycles ("e-bikes") as "bicycles" for most purposes within DCR properties. You are in receipt of a letter signed by many Friends groups across the state (attached) advocating that this regulation limit e-bike use to paved paths at least 8 feet wide, and further proposing a process for creating exceptions to that general rule.

Summary of PMAC recommendations:

- 1. Paved paths which are used for transportation need to be striped and in some places stenciled to enable better sharing between users of different modes.**
- 2. Speed limits need to be prominently posted, and to vary to reflect the risks (e.g. near T stops, pedestrian zones, poor sight lines)**
- 3. Prominently remind users that the paths should be shared courteously, since enforcement of almost any rule about e-bikes or speed will be difficult.**

Discussion: While we are in support of the Friends' request to limit e-bike use on non-paved trails, there are several issues that are particular to urban parks such as ours (including the Esplanade, Neponset Trail and others which come to mind) which need to be addressed.

The path through the Southwest Corridor Park is heavily used for transportation purposes, since it is one of only a handful of off-road routes into the center of Boston. As such, we support the (careful) use of e-bikes on our path:

- E-bikes can provide mobility for seniors and people with disabilities
- As a means of transportation, e-bikes are a clean energy alternative to driving, thus helping the Commonwealth achieve its environmental goals
- E-bike ownership is less expensive than car ownership, providing options to people of limited means, encouraging equity.

However, we have observed:

- With speeds much greater than those of pedestrians and many cyclists, passing maneuvers on an e-bike can be dangerous. There is a need for speed limitation (beyond any limits inherent to the e-bike itself) and encouragement of courteous behavior.
- Enforcement of the distinction between the various classes of e-bike will be difficult. And many e-bikes that are currently being sold are considered Class 2 because, in addition to pedal-assist, they include a throttle, even though they have the same top-speed of 20 mph.
- On the SWC path, over the past few years we've seen growth in other electric-powered non-pedal micro-mobility devices, such as scooters, skateboards and hoverboards, many of which are less maneuverable and more difficult to stop than bikes. To keep the regulations relevant, these also need to be addressed.

Accordingly, we advocate strongly for:

- We have for several years requested striping of the path (similar to what is now on the Paul Dudley White path) and in certain places stenciling of intended (bike vs pedestrian) uses. We provided a section-by-section plan for this to DCR in 2015, but still nothing has been done. Stripes on the path will encourage users to stay to one side or another, and make users aware that they're deviating when they are passing. This continues to be an important safety issue, and will become more dangerous as more people choose e-bikes, which in general are faster and heavier than traditional bicycles.
- Prominent signs should be placed at each entrance to the SWC Path (where we currently have pillars directing pedestrians and cyclists) indicating the speed limit, irrespective of mode. Our understanding is that there is a general 15 mph speed limit, though in some sections a lower limit is more appropriate, such as where the path goes through the Lorber Playground at Jackson Square, where it passes near T stops with heavy pedestrian use, as well as in much of the South End and Back Bay where the path is fully shared between cyclists with pedestrians.
- These signs should also include wording along the lines of "Slow down to pass and be courteous". Obviously neither the speed limits nor these suggestions will be enforceable, but they will make high-speed users aware of what is expected of them.

We are happy to meet with you or other DCR staff to clarify and work out more details, but we believe that this is very important to the safety of the many thousands of people who use the Corridor every day.

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