

Comments on Pines to Mines EA

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Subject: Pines to Mines

To: Eli Ilano, Forest Supervisor

From : **Don Rivenes, Conservation Chair, Sierra Foothills Audubon Society**

Support for Alternative #3

Purpose and Need

The Purpose and Need of the Preliminary EA (PEA) states: "Providing recreation opportunities is one of the Forest Service's major missions in California (USDA 2004). The purpose of the Pines to Mines Trail project is to connect the City of Nevada City to the Town of Truckee with a multi-use native surface recreational trail. Residents, community organizations, and local businesses have expressed a need to expand public access to trails and open space, support economic development, improve sustainable recreation opportunities, and connect the western and eastern portions of Nevada County with a multi-use trail."

Use of e-bikes on the proposed trail is not explicitly called for in this statement. There is no legal or policy basis that is forcing or propelling the addition of e-bikes to this proposed non-motorized trail (just an effort to create more e-bike business).

The USFS has said that the new guidance "provides clarity to land managers on the required process to respond to user needs and ensure sustainability of resources. E-bikes may only be permitted on additional trails after completing the required environmental analysis and public engagement".

The PEA backs up its statements as to lack of impact on the environment of e-bikes by citing Wilson and Seney 1994; Weaver and Dale 1978; IMBA 2015; Langford et al. 2015; TNF Unpublished 2020. The PEA is deficient by including such antiquated studies and by not including citations to these documents. Moreover, the EA is deficient by simply referencing an unpublished 2020 TNF paper, presumably of anecdotal observations, and not disclosing to the public how interested parties might access that data.

Trail Users

Page 3-16 of the Preliminary EA under conflicts states: "Mountain biking represents a significant and growing use on the TNF and now includes Class 1 E-Bike use that is attracting a more diverse population to healthy, outdoor recreation on publicly managed lands because Class 1 E-Bike users tend to include older, less experienced, and sometimes partially disabled users."

This statement would lead readers to believe that this is the main use of e-bikes and is contrary to the trend towards urban use for commuting purposes. Momentum website states: "An electric commuter bike will totally transform the way you get around your city. Here are 10 good reasons why it's time to make a change. A commuter electric bike will almost certainly get you to your destination quicker than your traditional mode of transport, so is it time to switch up your daily commute? Moreover, an e-bike is also a safe method to commute with your kids and family!"

Over the years, as more and more users access the single-track Pioneer trail with wheeled bikes, they increase speed on downhill runs, and frighten other, slower users on blind corners and hills. It has been proven that hikers, and slow movers with children, tend to vacate those trails with fast wheeled users. Allowing Class 1 e-bikes on the proposed trail may contribute to issues of environmental injustice and social equality due to the high purchasing costs of e-bikes.

The PEA is deficient in not disclosing these facts and, instead, presenting a biased and glowing view about the benefits of e-bike use while not disclosing and analyzing in detail the potential negative social and safety impacts associated with e-bike use on natural surface trails. The PEA's blanket assumption that sustainable trail design can mitigate the potential negative effects of e-bike use is both wishful and unsubstantiated; the lack of full disclosure of these negative effects renders the PEA analysis deficient and unable to support the TNF's adoption of the proposed action.

Additionally, faster moving e-bikes will displace slower-speed users who fear for their safety in the terms of collisions. This combination is contrary to the Forest Service pitch to expand access to trails and open space and provide sustainable recreation. With the introduction of Class 1 e-bikes there will be an inevitable jump to even faster Class 2 e-bikes. Soon the hikers, equestrians, and families with children will be pushed to the side. The PEA is deficient in that it conducted no study to show that this will not be the case.

Grouse Ridge Vehicle Control Area

The Tahoe National Forest 1995 plan states: "At the same time, demand for nonmotorized access into undeveloped areas is increasing. Hikers and horseback riders seeking this experience are often in conflict with OHV use, especially with mountain bikes and motorized trail bikes on narrow trails. Presently, Grouse Lakes, Granite Chief Wilderness, and Castle Peak motor vehicle closure areas provide recreational opportunities for hikers and equestrians without this conflict. Most of the Grouse Lakes Area (10,096 acres - 90 percent) is managed for semi-primitive nonmotorized recreational opportunities."

In reviewing Figure 4 of the PEA, it shows the route using the Lake Spaulding (reservoir) trail. It goes around the reservoir, and it appears to enter the Grouse Lakes semi-primitive nonmotorized area and IRA. The PEA fails to disclose whether or not the P2M Trail would pass through this semi-primitive non-motorized area, as identified in

the Forest Plan. No maps are provided to allow the reader to discern this. If indeed the trail is proposed to pass through the vehicle control area, the proposed action with its inclusion of Class 1 (motorized) e-bike use would conflict with Forest Plan direction. These facts must be disclosed in the EA.

Grouse Ridge Inventory Roadless Area

The proposed route past Lake Spaulding drops down to follow the Carlyle road and continues east within the southern boundary of the Inventory Roadless Area.

Inventoried roadless areas (IRAs) in national forests are public lands that are ecologically intact and could be prime candidates for addition to the protected-area system, thereby contributing to the goal of protecting 30% of the Earth by 2030.

The PEA fails to disclose that the proposed alignment of the P2M Trail passes through the Grouse Lakes IRA. As such, the PEA is deficient as it does not include analysis of the potential impacts associated with the proposed action, including use of motorized Class 1 e-bikes, as it relates to the TNF's obligations for the protection of IRAs as per the agency's 2001 National Roadless Area Conservation Rule (Roadless Rule).

Castle Peak Area and the Pacific Crest Trail

Sierra Forest Final Plan (May 26,2023) states: "The Pacific Crest National Scenic Trail provides for outstanding journeys on foot or horseback along the Pacific mountain ranges. These primitive forms of travel hearken back to a simpler and more rugged time. Tranquility and closeness with nature can be found consistently along the trail, evoking a feeling of extended retreat from civilization, even if venturing out for only a day."

We have seen mountain bikes on the portion of the Pacific Crest trail to the Sierra Club Peter Grubb Hut at Castle Pass. Any points of crossing the Pacific Crest Trail should be adequately marked to make sure the e-bike and other mountain bikes do not use the Pacific Crest trail.

Travel Management Plans

Over the years we have seen the Tahoe National Forest move steadily away from quiet recreation to motorized recreation. The updated Part B and Part C Travel Management Plans authorized existing and new OHV and OSV trails to clarify where motorized vehicles are allowed. E-bikes now threaten to add trails to the maps without proper analysis. We might add that a similar Forest Service effort was not done to protect hiking and equestrian trails.

The U.S. Forest Service (USFS) considered specific criteria for the designation of trails or areas (36 CFR 212.55(b)) for wheeled motorized vehicle use with the objective of minimizing:

1. Damage to soil, watershed, vegetation, and other forest resources. 2. Harassment of wildlife and significant disruption of wildlife habitats. 3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands. 4. Conflicts among different classes of motor vehicle uses of national Forest System Lands or neighboring Federal lands. 5. Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.

These criteria were discussed in the PEA under minimization in Appendices but as stated earlier, the PEA is deficient by referring to antiquated studies and by not including citations to these documents.

USFS National Ruling and its Impacts

The USFS ruling states that a non-motorized trail which gives access to an e-bike would be reclassified as motorized, even if e-bikes are the only motorized mode of transportation it allows.

We recognize that e-bikes have a place on public lands and generally should be allowed where motorized vehicles are permitted. We oppose any decision that would allow any class of vehicle with a motor – including all classes of e-bikes, which by definition have a motor – to be allowed on non-motorized trails. A contrary interpretation would create an unmanageable slippery slope and threaten future management of all non-motorized trails and areas on public lands.

Non-motorized trails were created to ensure that the public could find recreational trail opportunities free from the ever-growing motorization and mechanization. Millions of public land users including hikers, backpackers, hunters, horse packers, climbers, mountain bikers and many more, value nonmotorized trails for recreation. Opening non-motorized trails to motors would forever change the backcountry experience for these users.

Federal land managers simply do not have the resources to police e-bikes on trails. Permitting e-bikes on non-motorized trails is contrary to long-standing “travel management” laws and policies dating back to the Nixon administration that require *all motorized* recreational uses of our public lands to be confined to a system of designated roads, trails, and areas.

Millions of public land users across the country enjoy both motorized and non-motorized recreational experiences. Opening non-motorized trails to motorized bikes would effectively eliminate the nonmotorized, primitive recreational opportunities. We strongly oppose any effort to change existing trail management rules or policies and encourage all federal land management agencies to reject any effort to open non-motorized trails to e-bikes or other motorized vehicles.

Conclusion

Today the majority of the existing trail system that will become the Pines to Mines trail is non-motorized with no electric motorized bikes allowed. We should keep it that way. We support Alternative 3 - non-motorized multiuse trails with no e-bikes. Keep the e-bikes in the Tahoe basin on existing motorized trails. Leave the Pines to Mines trail to users that are true mountain bikers, hikers, and equestrians.

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