



February 25, 2022

Submitted via email to: [comments-pacificsouthwest-tahoe-yuba-river@usda.gov](mailto:comments-pacificsouthwest-tahoe-yuba-river@usda.gov)

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## RE: Pines to Mines Trail Project EA, Project 61221

Forest Supervisor Ilano:

We appreciate the opportunity to provide the following scoping comments on the Pines to Mines (P2M) Trail Project Environmental Assessment (EA), as solicited via the Tahoe National Forest's (TNF's) January 26, 2022, public scoping notice.

### Back Country Horsemen of America

Founded in 1973, Back Country Horsemen of America (BCCHA) is a national 501(c)(3) non-profit service organization. Our mission is to perpetuate the common-sense use and enjoyment of horses in America's back country and Wilderness and to ensure that public lands remain open to recreational stock use. A large part of our mission includes assisting the various government agencies and non-profit organizations in the maintenance and management of public trails and horse camps.

### Back Country Horsemen of California

Back Country Horsemen of California (BCHC) is a non-profit organization dedicated to the improvement, promotion, development, and care of trails in the backcountry of California. BCHC volunteers maintain horse camps and trails, including trails located within the Tahoe National Forest. The members that comprise BCHC, its Mother Lode Unit and their families, also enjoy recreational horseback riding on trails throughout the Tahoe National Forest. The ability to access trails that provide an escape from the motorization and mechanization of modern society is one reason Backcountry Horsemen use and enjoy non-motorized trails within the Tahoe National Forest.

### Understanding of the Proposal

As stated in the Draft Proposed Action for the P2M Trail Project:

The Forest Service is initiating public scoping for the proposed Pines to Mines Trail project. The project proposes development of a multi-use native surface trail system connecting Nevada City, CA to Truckee,

CA. The proposed trail system would be approximately 68 miles in length and would include all, or parts, of existing Forest Service network trails, as well as some new trail construction.

The project's proposed actions include: Constructing approximately 16-18 miles of new, native surface, single-track trail from Eagle Lakes to Donner Summit connecting the existing Grouse Ridge and Hole in the Ground trails; Designating all, or portions of, approximately 50 miles of identified existing Forest Service System trails as part of the new Pines to Mines Recreational Trail system.

Regarding the use of electric motorized bicycles (e-bike) on the otherwise non-motorized trail, the Draft Proposed Action (p.2) includes the following broad statement regarding allowable uses to be analyzed for the P2M Trail:

Designate the allowable uses of the proposed Pines to Mines Recreational Trails system. Forest Plan direction and Agency regulations, including the 2005 Travel Management Rule if applicable, along with different use scenarios and public input, will be assessed to determine the allowable uses. Potential uses include hiking/walking, running, mountain biking (including pedal-assist Class 1 E-Bike<sup>1</sup>), and equestrian riding.

Such a statement appears misleading, as e-bike use is not considered under existing U.S. Forest Service policy to represent a subset of non-motorized mountain biking. Rather, current Forest Service policy categorizes all forms of e-bikes as motorized bicycles.<sup>2</sup> **If the TNF chooses to carry forward e-bike use in the Proposed Action for the P2M Trail, its description of e-bike use must accurately represent the facts as they reflect how and why the agency classifies e-bikes as motorized bicycles.**

Also left unstated is the fact that the TNF would be required to amend Trails Management Objectives (TMOs) for each of the existing trails that comprise the P2M Trail by adding a Special Vehicle Designation to allow Motorized, Class 1 e-bike use. In other words, the Draft Proposed Action would require authorizing a motorized use (Class 1 e-bikes) on the otherwise non-motorized P2M trail. **These definitions and the necessary process for establishing e-bike use on otherwise non-motorized trails must be fully disclosed in the P2M Trail Project EA.**

It is also our understanding that prior to the proposal taking affect, the Forest Service would be required (by the agency's Travel Management Rule (36 CFR Part 212)) to update the Forest's relevant Motor Vehicle Use Maps to reflect this change—the formal process by which the agency would reclassify non-motorized trails to trails that allow a motorized use. Again, public scoping materials issued by the TNF do not make this distinction, nor do they describe the process that would be necessary in order to make such a change to TMOs covering approximately 50 miles of current non-motorized trails. **The EA's Proposed Action should include disclosure of any and all of these relevant facts related to the authorization of motorized use(s) on the proposed P2M Trail.**

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<sup>1</sup> A footnote provide in the Draft Proposed Action reads as follows: "Class 1 E-Bike - is defined as a low-speed pedal-assisted electric bicycle equipped with a motor (750 watts or less) that provides assistance only when the rider is pedaling, and that ceases to provide assistance when the bicycle reaches the speed of 20 miles per hour."

<sup>2</sup> Available at: <https://www.fs.usda.gov/detail/r5/recreation/?cid=fseprd557285>

## Comments Specific to the Pending EA

BCHA and BCHC have long advocated for the design and construction of trails, trailhead facilities including adequate parking for horse trailers, and for campgrounds that accommodate equine visitors. As personnel of the TNF are aware, our local volunteers assist in these efforts, including the on-going maintenance of trails and campgrounds like Skillman Horse Camp. Our scoping comments herein address only the proposed designation of e-bike use on the P2M Trail. We understand that individual members of BCHC have submitted separate scoping comment letters that address issues in addition to the proposal regarding e-bike use.

### The EA Purpose and Need Should Reflect the Non-Motorized Intent of Use on the P2M Trail

**The Purpose and Need statement in the EA should not be defined so broadly as to include the use of electric motorized bicycles (e-bikes) on the P2M Trail.** To do so would run counter to the long-standing concept that the P2M Trail, as envisioned by the alliance of trail users who conceptualized and promoted the P2M Trail as early as 2015 and to the present day. The P2M Trail always was to be considered a non-motorized, single-track multi-use trail to be shared by hikers, mountain bicyclist and equestrians.<sup>3</sup> Motorized uses, including e-bikes, were not envisioned on the P2M Trail nor were advocates for e-bike use represented among the Pines to Mines alliance of trail users.

**The EA should also disclose the fact that easements were negotiated by the P2M Trail alliance for the trail alignment where it crosses private lands and that grants the alliance acquired to date that are related to the trail were all predicated on its use as a non-motorized trail.<sup>4</sup> The EA should analyze the ramifications of these commitments if its Proposed Action or action alternatives continue to include the potential use of motorized e-bikes along segments or the entirety of the P2M Trail.**

**The EA must disclose that P2M Trail project funding provided by the Nevada County Board of Supervisors to support the current EA analysis was predicated on the requirement that County funding was not to be used to fund analysis of e-bike use on the trail.<sup>5</sup> This requirement reflected the unanimous consent of the Supervisors, with some echoing that the original intent of the P2M Trail was to exclude motorized uses.<sup>6</sup> Consequently, the Purpose and Need statement and the Proposed Action for the P2M Trail EA should accurately reflect the non-motorized intent of the P2M Trail proposal, which was to exclude the use of electric motorized bicycles, as expressed by local citizens that comprise the P2M Trail alliance and their elected officials.**

### The EA Should Disclose Current Recreation Opportunity Spectrum Classes in the Planning Area

**The EA should describe the current Recreation Opportunity Spectrum (ROS) classification for lands crossed by the proposed P2M Trail and include a table that summarizes these ROS classes and the**

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<sup>3</sup> Gold Country Trails Council letter to U.S. Forest Service Chief Randy Moore, RE: Pines to Mines Trail Project, Tahoe National Forest. August 24, 2021.

<sup>4</sup> *Ibid*

<sup>5</sup> Board of Supervisors for the County of Nevada, Resolution Approving the Contract with Truckee Trails Foundation for the Preparation of Environmental Review Documents for the Pines to Mines Trail Project in the Maximum Amount of \$100,000 (Resolution No. 21-507, 16 November 2021), and which states in part: “The proposal included the requirement not to fund any analysis of electric bike usage on the trail with County funding.”

<sup>6</sup> County of Nevada, State of California, Board of Supervisors. Summary Minutes – Draft. Regular Meeting. Tuesday, August 10, 2021 (pp.9-11).

**amount of trail miles that would pass within each.** It is our understanding that a portion of P2M Trail alignment that traverses the Grouse Ridge area is identified in Forest planning and related ROS maps as an area containing a ROS classification of primitive, non-motorized recreational use. We would appreciate confirmation of this fact in the EA, if correct. **The EA should include analysis of the relative compatibility or incompatibility of proposed modes of travel along the P2M Trail, including the use of electric motorized bicycles, with each of the applicable ROS classifications through which the proposed trail alignment(s) would pass.**

#### The EA Should Disclose the Range of Potential Impacts of E-Bike Use

We are concerned about the agency's apparent desire to authorize a motorized trail use—e-bike use—throughout the P2M Trail alignment. It is our view that designating non-motorized trails for use by electric bicycles should be conducted sparingly and only for those trails where the administering agency can clearly demonstrate that there exists little to no potential for e-bike use to pose conflicts on trails that are currently shared by hikers, equestrians and others. Our primary concerns are safety, user conflict and the potential for the displacement of traditional non-motorized users should such user conflict with e-bike use occur.

Under existing Forest Service policy, e-bikes are considered “motorized bicycles” as per the 2005 Travel Management Rule while agency policy declares that “Consistent with 36 CFR 212.1, the Forest Service is managing e-bikes as motor vehicles.”<sup>7</sup> The electric “assist” offered by an e-bike is aided by an electric motor which, according to one major U.S. manufacturer declares: “At peak assist, it’s like having four of you powering the pedals—amplifying your input by up to 410%.”<sup>8</sup>

While not an internal combustion-driven motor, the powerful electric motor contained within a Class 1 e-bike is a motor nonetheless—more equivalent to that found in an electric motorcycle than what comprises the drivetrain of a regular mountain bike. As such, **the TNF must apply a sufficient level of scrutiny in its EA analysis following guidelines established via the Travel Management Rule when considering proposals for the use of e-bikes on system trails.** In other words, the EA’s analysis of e-bike use cannot be based on the presumption that the potential impact of e-bike use is no different than that of regular (non-motorized) mountain bike use on the P2M Trail for reasons described previously.

**The Pines to Mines Project EA must disclose the potential social and physical impacts of e-bike use in terms of its unique effects on other forest visitors and forest resources unique to this portion of the Sierra Nevada Range.** While the available science is scant regarding the relative physical impacts of e-bike use compared to that of regular mountain bikes, **the EA should cite relevant peer-reviewed studies**

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<sup>7</sup> U.S. Forest Service Briefing Paper: Classification of E-bikes Under the Travel Management Rule (TMR). February 15, 2017.

<sup>8</sup>See: <https://www.specialized.com/us/en/turbo-kenevo>, which describes a Class 1 e-bike that, according to the Draft Proposed Action for the Pines to Mines Trail Project, the TNF proposes to be considered for use on the otherwise non-motorized P2M Trail. Ironically, the video that accompanies this ad includes the following claim: “Specialized Turbo is not like anything you’ve ever experienced. It’s not even a bike! Its two wheels of hair-raising power that will revolutionize the way you move. It’s you, only faster. Its distance being shorter. Up hills, easier. Downhills, crazier.” It is this potential for riders of Class 1 e-bikes, who wish to display their extraordinary speed and capabilities, that creates a high potential for conflict with hikers, equestrians and other trail users.

**in order to support any conclusions that use of Class 1 e-bikes on the P2M Trail would not result in impacts in excess of those anticipated from the ongoing use of regular mountain bikes.** The EA analysis should give little, if any, weight to studies or interviews of trail users that were prompted, supported or undertaken by proponents of e-bike use or the e-bike industry. Moreover, caution should be taken in applying in the EA the results of any e-bike related biophysical studies of impacts if such studies were undertaken in ecological regions different from those found within the project area.

#### The EA Should Disclose Potential Safety Impacts Associated with E-Bike Use

**The EA must address the potential for recreational conflict on the existing and proposed P2M Trail network, including the recognition of potential safety hazards associated with the use of Class 1 e-bikes on otherwise non-motorized trails that comprise the P2M Trail alignment(s).** For example, **the EA must disclose existing Forest Service policy, which states that “E-bikes travel at speeds of 20 to 28 mph, compared to pedestrians and non-motorized bicycles, which typically travel at speeds ranging from 3 to 10 mph.”**<sup>9</sup>

While the Draft Proposed Action implies that the authorization of e-bike use on the P2M Trail would be limited to those e-bikes that fall within the U.S. Consumer Products Safety Commission’s (CPSC’s) definition of a Class 1 e-bike, capable riders can, and do, exceed the maximum motor-assisted speed of 20 mph. **The EA must disclose and analyze the safety impacts associated with this inevitable outcome.**

An e-bike, which is capable of rapid acceleration and speeds in excess of a standard mountain bike could represent a danger to other trail users, particularly along relatively flat or uphill terrain where higher than normal speeds could be attained via the motor assist. **The EA must include an analysis in keeping with published scientific literature regarding trail conflict, including literature reviews published by the federal government, which clearly state that “Speed is a major source of conflict between trail users.”**<sup>10</sup>

A recent study in *Injury Prevention*<sup>11</sup> found that e-bike riders were more than three times more likely to be involved in a collision with a pedestrian, as compared to traditional bike riders. Not surprisingly, speed was found to represent the most critical factor in such collisions. The study found that an increase from 10 mph to 20 mph significantly increases the kinetic energy and risk for injury upon impact. The study concluded that e-bike use and injury patterns differ from more traditional pedal operated bicycles. **These and other facts regarding the relative safety of e-bike use must be referenced in the P2M Trail Project EA. At a minimum, the EA needs to address the difference in the speed of travel between e-bikes and non-motorized trail users and its implications for visitor safety, including that of pedestrians (hikers) and horsemen (equestrians).**

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<sup>9</sup> *Ibid.*

<sup>10</sup> Federal Highway Administration (FHWA) and the National Recreational Trails Advisory Committee, 1994. Conflicts on Multi-Use Trails: Synthesis of the Literature and State of the Practice. [https://safety.fhwa.dot.gov/ped\\_bike/docs/conflicts.pdf](https://safety.fhwa.dot.gov/ped_bike/docs/conflicts.pdf)

<sup>11</sup> DiMaggio CJ, Bukur M, Wall SP, *et al.* Injuries associated with electric-powered bikes and scooters: analysis of US consumer product data. *Injury Prevention*, Published Online First: 11 November 2019. doi: 10.1136/injuryprev-2019-043418. Note: The study reviewed e-Bike use on primarily urban roads and bike paths.

The proposal to authorize Class 1 e-bike use on the P2M Trail likely would result in such trails becoming viewed by hikers and equestrians as either less desirable, less compatible for shared use, or outright unsafe for shared use. Hikers and equestrians, and particularly those with children, often will choose to avoid trails where there is a potential for encounters with fast-moving bicycles. For example, when selecting among trails available in a given area, a key criterion shared by equestrians is safety concerns and the sometimes unpredictable response of their horses or mules in the event of a surprise on-trail encounter. The ability of e-bikes to travel at relatively high speeds, combined with their often silent approach, elevate the potential for dangerous encounters. **The EA must acknowledge these facts.**

#### The EA Must Cite Guidance Promulgated via the 2005 Travel Management Rule

The EA must comport with guidance contained within the 2005 Forest Service Travel Management Rule (TMR).<sup>12</sup> Specifically, **the EA must describe how the Proposed Action, and any action alternatives, comply with the agency’s broad definition of off-road vehicle (ORV) and the requirement that all ORVs be subject to travel management planning and the so-called “minimization criteria.”** As described previously, it is U.S. Forest Service policy to treat e-bikes as motorized vehicles. **The EA should make specific mention of the governing travel management Executive Orders (EOs).**<sup>13</sup> The U.S. Forest Service codified the minimization criteria in its travel management regulations at 36 C.F.R. § 212.55(b), which provide:

***“Specific criteria for designation of [motorized] trails and areas.*** In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, **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;** and
- (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. In addition, the responsible official shall consider:
- (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.” [bold added for emphasis]

**The TNF is obligated to consider and document compliance with these specific criteria in the EA regarding the designation of trails for motorized (e-bike) use.** Case law confirms the Forest Service’s substantive obligation to meaningfully apply and implement—not simply identify or consider—the minimization criteria when designating each area or trail, and demonstrate in the administrative record how the agency did so.<sup>14</sup> As a recent circuit court of appeals decision confirmed, the Forest Service must

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<sup>12</sup> 36 CFR § 212, 251, 261, and 295. Travel Management; Designated Routes and Areas for Motor Vehicle Use; Final Rule.

<sup>13</sup> See Exec. Order No. 11644, §§ 1 & 3 (Feb. 8, 1972), as amended by Exec. Order No. 11989 (May 24, 1977); 36 C.F.R. § 212.55(b).

<sup>14</sup> See, e.g., *Idaho Conservation League v. Guzman*, 766 F. Supp. 2d 1056, 1072-73 (D. Idaho 2011) (consideration of the minimization criteria insufficient where agency failed to demonstrate that the criteria “were then implemented into the decision process”).



“document how [they] applied [relevant] data on an area-by-area [or route-by-route] basis with the objective of minimizing impacts.”<sup>15</sup> Consequently, **the EA must include these elements as they relate to Special Vehicle designations proposed for Class 1 e-bikes**, as they would in the designation of any trail for use by either motorcycles, ATVs, or other off-road vehicles.

#### The EA Must Disclose the Ability of Law Enforcement to Ensure Compliance of E-Bike Riders

The Draft Proposed Action for the P2M Trail Project signals that the TNF will consider authorizing Class 1 e-bike use on the P2M Trail. Yet there are two other classes of e-bike defined by the Consumer Products Safety Commission (CPSC) that are not referenced in Draft Proposed Action yet that are likely to find their way onto the proposed P2M Trail:

1. Class 2 e-bikes come with the distinction that the motor assist can be attained either via the rider peddling or in the complete absence of peddling by use of a throttle (i.e., it can be propelled up to speeds of 20 mph in a fashion similar to a motorcycle), whereas;
2. Class 3 e-bikes provide assistance only when the rider is pedaling, and which cease to provide assistance when the bikes reach the speed of 28 mph. For all three classes, the CPSC limits the maximum power output of the e-bike to 750 watts.

**The EA must describe the significant challenges to law enforcement in their ability to differentiate in the field between the various classes of e-bikes used by the public on the proposed P2M trail.** It is difficult to determine in the field which class a given e-bike conforms to, as identifying stickers, decals or other information are not required and few manufacturers do so. In addition, there are e-bikes that can be programmed to function as either a class 1, 2 or 3 with only minor adjustments. Even more daunting, YouTube contains numerous videos with tips and work-arounds to negate the speed governor found on most e-bikes.

Further compounding enforcement challenges, in a new and rapidly evolving market, there are a great number of commercially available e-bikes that do not fall within the CPSC’s technical specifications. For example, there exist e-bikes (with functional pedals) that are similar in appearance to Class 1 e-bikes yet possess motors that exceed 1,000 watts and can achieve speeds exceeding 50 miles per hour.<sup>16</sup> Importantly, some e-bikes currently on the market cannot be distinguished via appearance alone from traditional non-motorized bicycles.<sup>17</sup> It would be extremely difficult, if not impossible, to distinguish these e-bikes in the field from the Class 1 e-bikes that the Forest Service proposes to authorize for use on non-motorized trails throughout P2M Trail. **The EA should include disclosure about the range of e-bikes that have capabilities in excess of the CPSC’s Class 1 specifications and its implications for**

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<sup>15</sup> *WildEarth Guardians v. U.S. Forest Serv.*, 790 F.3d 920, 931 (9th Cir. 2016).

<sup>16</sup> Nargess Banks, Looking For The Ultimate Urban Toy? Introducing SWIND EB-01 Hyperbike, *Forbes* (Feb. 27, 2018), available at: <https://www.forbes.com/sites/nargessbanks/2018/02/27/swindeb01-hyperbike/#122a56b73a0a> (“Designed for the urban adventurer and cross-country adrenalin junkie, the \$21,000 (£15,000) bicycle has an electric motor to help boost pedal power and deliver speeds of over 60 mph”); Ben Coxworth, Rungu’s electric fatbike goes pedal-assist, *New Atlas* (July 8, 2018), available at: <https://newatlas.com/rungu-electric-juggernautmdv/55294/>.

<sup>17</sup> See, for example, *Goat Track SLX*, Goat Bikes, at: [https://www.goatbikes.com/section811575\\_327663.html](https://www.goatbikes.com/section811575_327663.html).

**adequate enforcement and monitoring of e-bike use throughout the proposed non- motorized trail system.**

**The EA must disclose current law enforcement priorities and capability within the TNF, and the likelihood of its enforcement of e-bike regulations.** Stated plainly, the Forest Service’s attempt to prohibit Class 2 and Class 3 e-bike use—or any of the other non-CPSC classified e-bikes—on the proposed trail system is nearly impossible to enforce. Any decision by the TNF to allow specific types of e-bikes on a given trail while simultaneously expecting to prohibit other e-bike classes on the same trails would prove to be a fallacy. **The implementation and enforcement issues described above, and their associated environmental impacts, must be analyzed and disclosed in the EA.**

The EA Should Identify the Presence of Inventoried Roadless Areas and/or Backcountry Management Areas Traversed by the P2M Trail

**The EA must clarify the proposal with respect to trail construction and designation within any identified Inventoried Roadless Area (IRA) and include analysis of how the proposal to authorize a motorized use (i.e., Class 1 e-bikes) comports with requirements for the protection of IRAs as per the agency’s 2001 National Roadless Area Conservation Rule (Roadless Rule).** Similarly, **the EA must identify the presence of any Backcountry Management Areas (BMAs) crossed by the P2M Trail alignment(s),** if indeed such vernacular applies given that the current Land and Resource Management Plan for the TNF, with amendments, dates back to 1990.

In the case where the P2M Trail alignment(s) traverses either an identified IRA or BMA, **the TNF should develop and analyze alternatives to the Proposed Action that, at a minimum, would not include the authorization of motorized uses (e.g., e-bikes or motorcycles) under either classification.** Put another way, the EA should include alternatives that restrict motorized trail use to Forest Service-managed lands located outside of IRA and BMAs.

## Conclusions

We are glad that the agency has made this citizen-proposed project a priority and has directed resources toward implementation of the Pines to Mines Trail as envisioned by local citizens dating back to 2015. Yet we question the need to expand this proposal beyond what its visionaries intended—a long-distance non-motorized trail that links the communities of Nevada City and Truckee. To underscore this point, we note that the website maintained by the TNF reads regarding e-bike use currently reads as follows:

The Tahoe National Forest offers a wide variety of e-bike riding opportunities. This includes over 2,000-miles of roads, 195-miles of OHV trails, 190 miles of single-track motorcycle trails, and an additional 35 miles of newly designated single track available to Class-1, pedal-assisted E-Bikes. All roads and trails open to motor vehicle use are available for all classes of e-bikes. <https://www.fs.usda.gov/tahoe/>

There appears to be abundant opportunities for the use of e-bikes throughout the TNF, including over 35 miles of previously non-motorized trails that recently were approved for use by Class 1 e-via the East Zone Connect Project and EA. As such, we question the need to include e-bike use on the P2M Trail.

We do not dispute the important fact that e-bikes have the potential to introduce people to the wonder and excitement of exploring their national forests and, in particular, create opportunities for people who would not otherwise have the physical ability to strike out on their own without the motor assist



provided by an e-bike. We understand that e-bikes have their place on public lands and we embrace their potential benefits to the recreating public. Our chief argument remains that e-bikes should not be allowed on trails or in landscapes designated for non-motorized recreational use. The relatively low speed that currently characterizes uphill travel by mountain bikes would become a relic of the past if e-bikes were introduced to non-motorized trails, as even riders of Class 1 e-bikes have the potential to approach 20 miles per hour when traveling modest uphill grades.

The concept of multi-use trails where hikers, hunters, equestrians, and mountain bikers share a common path in relative harmony could become a casualty if the current P2M Trail proposal includes e-bike use. The Forest Service has a responsibility to ensure this does not occur by not invoking a Special Vehicle Designation for Class 1 e-bike use for the P2M Trail. Instead, we believe that the agency should concentrate its efforts toward directing e-bike use to the extensive system of roads and motorized trails throughout the TNF. Thank you for allowing us this opportunity to submit public comments.

Sincerely,

Randy Rasmussen, Director, Public Lands & Recreation

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Post script:



## FASTER IN THE ROUGH

This bike is blazing fast over the roughest trails. We gave the axle path that reduces rear wheel "hang-up" on big rocks and momentum, control, and speed.

The picture and caption above are taken from an advertisement that promotes the sale of a Class 1 motorized electric bicycle. In this instance, the manufacturer clearly targets a young and adrenalin-seeking demographic through the use of statements such as:

- The e-bike is "blazing fast over the toughest trails,"
- Its design "(makes) it easy to maintain speed in dicey conditions,"
- Its motor "amplifies your pedaling input by a mind blowing 410%,"
- "At peak assist, it's like having four of you powering the pedals...," and
- "This is the bike that lets you summit the longest, nastiest climbs with energy to spare so that you can bomb down the longest, nastiest descents."

The e-bike depicted has "the most powerful motor on the market" at 250W nominal and a 700 watt-hour battery. As such, it falls well within the parameters of a Class 1 e-bike as defined within the TNF's Draft Proposed Action for the Pines to Mines Trail Project.

The picture above appears to underscore a break-the-rules mentality by depicting this "blazing fast" e-bike rider as either uninterested or incapable of traveling within the trail tread (thereby failing any test of the minimum impact ethos). Any message encouraging "share the trail" with other users or to yield or exercise caution when approaching hikers or equestrians is absent.

While perhaps appropriate on a closed-course e-bike park, an encounter with a thrill-seeking rider on such a machine is the last thing an equestrian wants to encounter while trying to enjoy non-motorized trails throughout the Tahoe National Forest.