



Gold Country Trails Council, Inc.  
P.O. Box 753  
Cedar Ridge, California 95924

Eli Ilano, Tahoe National Forest Supervisor  
Yuba River Ranger District  
Attn. Pines to Mines Trail Project  
631 Coyote Street  
Nevada City, Ca 95959-2250

RE: Comments to the Environmental Assessment for the Pines to Mines trail project dated June 22, 2023 and posted in the newspaper of record on June 23, 2023. GCTC Support for Alternative 3 non-motorized only (no e-bikes).

## **OVERVIEW**

Gold Country Trails Council (GCTC) with over 500 current members, has been a partner with the USDA Forest Service establishing, building and maintaining non-motorized trails and campgrounds for over 40 years. Our organization has always supported multi-use trails with a designation of non-motorized. Over the years, GCTC has accomplished their mission in cooperation from the Nevada County Woods Riders (motorcycles) and Bicyclists of Nevada County. This formula has worked well.

From the beginning of the dream of the Pines to Mines trail GCTC has been a supporter of a non-motorized trail from Truckee to Nevada City and helping to raise funding for the project. GCTC was one of the original non-profit groups spearheading the effort.

The most important aspect of the EA was that it ignored the USFS National Ruling:

***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.***

## **THE PIONEER TRAIL**

The EA gives little deference to the past efforts put into the design and building of existing non-motorized trails that will be incorporated into the Pines to Mines project, including the historic Pioneer Trail. A large section of the Pines to Mines Trail is on the Pioneer Trail, which has been non-motorized since its inception in 1983 with an official dedication occurring in 2003. The Pioneer Trail has been a cherished and non-motorized trail for over 40 years.

## **OPPOSITION TO ELECTRIC MOTORIZED BIKES (E-BIKES)**

Many of the comments made in the 73 scoping letters submitted to the Forest Service opposed to e-bikes were ignored and under-analyzed in the EA. The recommended Alternative 2 provided little in the way of scientific study or analysis to support the inclusion of class 1 e-bikes on the Pines to Mines trail. To base the conclusion of incorporating class 1 e-bikes on non-scientific USFS observation in the Tahoe Basin and outdated studies from 1994 and 2015 is insufficient. There was no current analysis but there was a failure to disclose in the EA the full impact of motorized electric bikes on the environment, hikers, slow movers and equestrians. There was no analysis on the impact e-bikes will have with respect to speed and safety on the trail and the impact on wildlife. The EA fails to disclose what funding sources were used to analyze the potential impacts associated with e-bikes use on the Pines to Mines trail. There was a stipulation by the Nevada County Board of Supervisors when they funded the environmental assessment for Pines to Mines that the funding was to be utilized for a non-motorized trail. The EA must disclose where the funding originated to study the inclusion of class 1 e-bikes.

*At a minimum, an Environmental Impact Statement should be conducted on the inclusion of e-bikes on the Pines to Mines trail system before any class of e-bike is allowed.*

## **NO DISCUSSION OF ENFORCEMENT ON SPEED OR CLASS OF E-BIKES**

No discussion of enforcement of electric bike classes is discussed in the EA other than education and signage. This is a clear deficiency in the proposed action and preferred alternative and needs to be explained and addressed. How will the Forest Service enforce the various classes of e-bikes on the Pines to Mines trail if allowed, and provide for the safety of slow movers? With no enforcement, much faster and heavier class 2 e-bikes and e-bikes on prohibited trails can easily be common. The lack of law enforcement was brought up in numerous scoping letters. In practical terms allowing e-bikes with little to no enforcement means the Forest Service is disenfranchising hikers, slow movers and equestrians over motorized bike groups, contrary to Forest Service policy. To further make the point with respect to disenfranchising hikers, equestrians and children on bikes the Forest Service is currently building trails South of the Gold Country Equestrian Trail Head (Lone Grave) that will be optimized for bikes. Hikers, walkers and equestrians will all be excluded because of the unsafe combination of speed and slow movers. This design seems to be supported by the Forest Service, contrary to their stated goals of having safe multi-use trails for all. The EA fails to address this double standard with the proposed inclusion of e-bikes on the Pines to Mines trail. The EA is deficient in explaining this issue of introducing motorized electric bikes on what has been traditionally a non-motorized trail system. The EA is also deficient in explaining how the 50 plus miles of non-motorized trails will be redesigned or trail rules enforced to accommodate 20 mph motorized bikes, and still provide for the safe use by non-motorized users. As is noted in the EA, technology will continue to evolve with e-bikes. With no enforcement, and the inability to distinguish one class of

electric bike from another, non-motorized trails will turn into another venue for motorized 2-wheeled vehicles, disenfranchising other legal user groups.

## **SELECTING E-BIKES OVER TRADITIONAL TRAIL USERS**

The Forest Service is picking winners and losers. By selecting Provision of Recreational Opportunities Alternative 2 -The Proposed Action (3-15) the Forest Service preference is for a new user group (20mph motorized electric bikes) over other long established non-motorized trail users (slow movers).

It states:

“Current design standards for multi-use trails would be applied to all new trail construction...that are sustainable and enjoyable.”

“Improvements of existing trails for greater consistency with multiple-use design standards would provide all user groups with better and safer trail conditions.”

Unfortunately, the EA places an emphasis on e-bikes, diminishing the majority of other trail users in the forest. The EA points out recreational opportunities on public lands includes the new and increasingly popular use of e-bikes. The report fails to disclose that e-bikes are currently illegal on all the non-motorized trails on the western slope of the Tahoe National Forest. The EA puts emphasis on the economic value of the global e-bike market at \$5 billion dollars, but fails to recognize the economic value of other user groups, hikers, back packers, mountain bikes, and equestrians. The *American Horse Council 2017 National Economic Impact Study* points out that the horse industry has a direct impact to the U.S. economy of \$50 billion. This is ten times what the e-bike industry reports. This fact needs to be disclosed in the EA. The horse industry creates 988,394 jobs, \$38 billion in direct wages, salaries and benefits, and ripple effects to other sectors of the economy totals \$122 billion. In 2017, the number of horses reported as used for recreation is 3,141,449.

There is a great deal of documentation that supports the 50+ miles of non-motorized trails. Scoping letters pointed out there are 500 miles of motorized trails, not including the 2,000 miles of roads in the Tahoe National Forest, as compared to only 625 miles of non-motorized trails. Motorized electric bikes belong on motorized trails. The EA is deficient in not disclosing these important facts of existing motorized trails. The EA failed to analysis or disclose the loss of non-motorized trails with the Highway 20 realignment or the loss of existing designated non-motorized trail segments through routes, connections and circular routes because all or portions will be encompassed in the Pines to Mines trail. How does the new trail alignment fit with the Highway 20 realignment? Do the non-motorized users lose even more trail segments?

The vast majority of trail users in the forest are hikers, backpackers, and others which includes horses and other non-motorized activities. A recent study under the USDA is titled “*Recreation Economic Values for Estimating outdoor recreation economic benefits from the National Forest System, August 2017*”. The study established economic values for recreational benefit in numerical terms for each defined user group. In Region 5 of the Forest Service the numeric value broke out as follows: Backpacking 26.64; Hiking/walking/trail running,

77.95; Other Recreation, 58.49 which includes relaxing, horse riding, and other non-motorized activities, for a total of 163.08. Bikes 80.23 - which is a 2 to 1 difference between wheeled and foot trail users.

The emphasis in the EA of allowing another user group (electric motorized bikes) makes little sense. Introducing e-bikes will only disenfranchise the other non-motorized groups. Allowing 20 mile per hour motorized electric bikes does not produce a safe non-motorized trail. With no enforcement, class 2 e-bikes and e-bikes on prohibited trails can easily be common. To be clear, GCTC does not have issue with peddle bikes on the non-motorized trail.

### **E-BIKE TRAVEL SPEEDS AND IMPACT TO SLOW TRAIL USERS AND WILDLIFE**

A typical hiker travels at 2.5 to 3.5 miles an hour, a horse at a walk 3.5 to 4.0 miles an hour. The average speed of a recreational mountain bike is 4.9 mph. (*US Forest Service and Oregon Fish and Game studies*) Class 1 and 2 e-bikes can reach speeds of 20 mph, class 3 up to 28 mph, and all can be user modified to go faster. Many of the e-bikes are now being built with 750 watts of electric power enabling a rider to achieve very fast speeds.

There is significant evidence that greater speed on trails will result in greater impact to wildlife. E-bikes' greater speed and range will result in greater impacts on wildlife due to a larger trail zone of influence, further limiting quality habitat and habitat security. Based on the 2000 Forest Service study along with the Oregon Dept. of Fish and Game, they studied flight response of wildlife from a trail from ATVs and non-motorized mountain bikes at approximately 1,000 meters. The disturbance is 500 to 750 meters for horseback and hiking. An e-bike traveling at 10mph, a speed easily attainable on an e-bike, creates a disturbance area of 1,150 meters. Increased speed impacts the disturbance area as does the distance traveled. Allowing e-bikes in the Grouse Ridge area of the Pines to Mines trail with speeds of 20-28 miles per hour, well beyond the power and speeds of human non-motorized recreation, will result in wider and longer disturbance zones for wildlife than would be the case with non-motorized travel. (information obtained from the BCHA response to BLM, NPS and USFWS on e-bikes - 2020) The EA is deficient and fails to explain the impacts of speed on wildlife. These facts should be incorporated in the EA.

### **OPENING THE BACKCOUNTRY TO MOTORIZED USE**

The original intent of P2M and trail design was for non-motorized use. Opening more backcountry to motorized travel will have a negative effect of displacement and habitat loss to wildlife. There is no mention in EA of what other kinds of motorized use will occur such as single track motorcycles, quads, razors, side by side, or even 4x4 vehicles. There was no mention of trail maintenance funds generated by non-motorized users using volunteer workers.

If the P2M trail is motorized, the green sticker funds can be accessed for construction and maintenance and perhaps additional staffing. Is the motivation

for the Forest Service line officer to focus on increasing motorized travel access to the detriment of other quiet users of the trails? This is an absolutely a poor decision that goes against the multiple user mission of this Forest Service.

### **CONFLICTS AMONG USES OF PUBLIC LANDS AND QUIET RECREATION STUDIES (3-16)**

The EA points out in the justification for class 1 e-bikes that “class 1 e-bikes are attracting a more diverse population on public managed lands because class 1 e-bikes users tend to include, older less experienced, and sometimes partially disabled users.” There is no study backing up that statement.

In GCTC riders’ daily experience, it is the younger riders who predominantly ride e-bikes on the trails in TNF. This (and other observations below) should be disclosed in the EA, just like the anecdotal observations printed by the EA by TNF personnel that e-bike use does not conflict with other trail users. With respect to seniors, when GCTC members have seen seniors on electric bikes, it is on flat areas, paved and unpaved, not on single track trails in the forest. If the concern was really access for senior and disabled riders, they could have a license, like handicapped licenses for motor vehicles. A recent study from *You Gov* dated October 2022 traced the demographics of e-bikes owners in the U.S. The vast majority are younger users: 84% with an age of 18-44. Only 3% are seniors over 65. 59% Of the users are male and 41% are female. These facts must be disclosed in the EA.

EA states no observed or reported interactions negative between horses, hikers and mountain bikers. Those of us who ride horses or hike on the non-motorized trails know this is not true. We experience neutral or negative equestrian and hiker interactions on almost every ride or hike if the e-bikes are illegally on the non-motorized trails. When the interactions between equestrians, hikers, and bikes happen, if it is positive no one documents it. If it is negative, there is no reporting mechanism. The Forest Service employees never see the positive or negative interactions because they do not ride horses, hike or bike on these trails, or frequent them. The EA should disclose there is no mechanism for trail users to report incidents to the Forest Service, and how the Forest Service determines there are no conflicts on the trail.

No studies have been conducted to allow for observation and documentation of these e-bike trail interactions. Therefore, it is false to state or assume that equestrians and hikers and bikers, especially fast and silent bikes, interact positively. A study must be done, or trust the statement of those of us who ride horses and hike on the trails and experience these interactions firsthand.

GCTC members and locals have already had conflicts with illegal e-bike riders in the Lone Grave area. The illegal e-bikes are usually going at an unacceptable rate of speed for a narrow, non-motorized single-track trail. There are local residents who will no longer take their children to Lone Grave area trails because

of negative encounters with high-speed illegal e-bikes. There have been e-bikes who are totally unaware of hikers about to enter the Pioneer Trail, and e-bike riders who come up behind horses at high speed on the trail. One recent experience at Lone Grave involved two illegal electric bike riders, 20 to 30 years of age, coming down the trail at speed and slamming on their brakes to avoid a crash with a horse. They flew off trail and down an embankment. When asked about their condition, both cyclists literally screamed at the GCTC rider that they weren't even supposed to be on the trail with a horse. The e-bike riders' sense of entitlement is destroying the character of the non-motorized trails.

Unfortunately, these incidents are happening with more frequency. Existing studies do show that hikers and families do not return to areas where they have had frightening experiences with fast-moving bikes that can't stop for slow moving users.

### **E-BIKE FIRE DANGER PROVEN**

A key point that was left out of the EA and brought up in the scoping letters was the question of fire danger. Electric bikes utilize lithium-ion batteries for power generation and e-bike lithium-ion batteries have been known to explode and/or catch fire. Some cities have recently passed laws regarding fire rules and e-bikes. Battery fires are not an issue with the non-motorized trails today. How does the Forest Service intend to address this increased fire danger issue if e-bikes are allowed on the Pines to Mines trail?

### **GROUSE RIDGE NON-MOTORIZED AND SEMI PRIMITIVE DESIGNATION**

The Grouse Ridge area is currently designated as a non-motorized, semi-primitive area. A portion of the Pines to Mines trail (3-7), approximately .6 miles, will be on the Grouse ridge trail and .25 miles of new multi-use companion trail is routed around the semi-primitive non-motorized area (2-1). The plan also calls for improvements to the Grouse Ridge campground (2-2). The EA attempts to justify class 1 e-bikes as compatible for this area. Class 1 e-bike have a motor. E-bikes (there is nothing to prevent class 2 or 3) are not allowed in non-motorized semi-primitive areas. By rerouting a portion of the Grouse Ridge trail, the Forest Service recognizes the area as semi-primitive and non-motorized. 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. If Alternative 2 is selected, this area of the trail should be considered for an Environmental Impact Statement to address a complete study of the impacts of class 1 e-bikes, including the cumulative impacts of class 2 and 3, and the impact to wildlife. What is planned to prevent electric bikes from going off trail or following the trails in to the non-motorized semi primitive areas of Grouse ridge?

## **TRAIL HEAD IMPROVEMENTS AND TRAIL DESIGN DETAILS NOT DISCLOSED**

The facts regarding number of trailheads that can be used by equestrians for trailer parking and miles of non-motorized trails versus trail heads for motorized users is omitted and needs to be addressed. Adding 70 miles of motorized trail further degrades the quality of experiencing quiet areas and enjoyment for slow trail use hiking or horse riding on the Tahoe National Forest.

The EA notes improvements to parking and staging areas (2-2). Areas noted for improvements included Skillman Campground, Upper Burlington Road, Bear Valley, and Gold Country Equestrian Trail Head (Lone Grave), Conservation Camp Road, Grouse Ridge Campground, and Eagle lakes. All of these are of interest to GCTC members. Over the years, GCTC established and has made annual improvements to Skillman Campground, Gold Country Equestrian Trail Head (Lone Grave) and Burlington Road. We also maintain trails in the Grouse Ridge area. GCTC would be a willing partner in helping with improvements in these areas. A more detailed list of improvements to these areas would be helpful so GCTC can plan and understand the Forest Service intentions. Trail design is especially concerning. Grade reversals every 100 to 200 feet, optimized for bikes, are difficult for hikers or equestrians. A height clearance of 10 feet should be a minimum 12 feet for those mounted on a horse.

## **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.

The EA 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.*

### **THE FUTURE OF THE HIGHWAY 20 TRAIL SYSTEM**

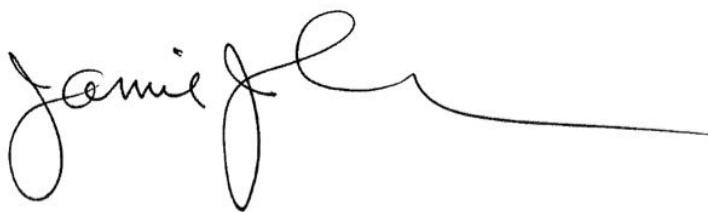
The EA failed to disclose and discuss the cumulative effects of past, present, and future use over the next 10 years. For example, the trail systems above Downieville and Sierra City are now almost exclusively used by bikers with slow users fearing to use the trails because of the fast-moving bikes. If Alternative 2 is selected we believe the future of the Highway 20 corridor trail system will soon include weeks of practice events and weekends of special events for fast moving motorized e-bikes. E-bikes and mountain bikes organizers can request races and these special events can be approved by the line officers with little to no effect analysis and little to no public comment opportunities. The quiet and slow movers will continue to lose opportunities to enjoy these and other trails in Tahoe National Forest.

### **CONCLUSION**

The Gold Country Trails Council members have supported the Pines to Mines Trail as a non-motorized trail since its inception. We strongly oppose opening non-motorized trails to motorized bikes because it would effectively eliminate the non-motorized, primitive recreational opportunities. The lack of specificity and indifference to slower movers in the EA and the inclusion of motorized electric bikes makes it impossible to support the recommended alternative.

Allowing electric motorized bikes will only take away the enjoyment of a large segment of the population and a high percentage of trail users who enjoy the solitude of the forest without fear of high-speed electric bikes. Adding electric bikes will disenfranchise a large portion of the current users who frequent the non-motorized trails today. If allowed, the forest will change, and not for the better. The only conclusion that can be reached is Alternative 3.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Canon", with a long horizontal flourish extending to the right.

Jamie Canon  
President, Gold Country Trails Council, Inc.