



July 20, 2026

Deciding Official:
Amber Waters
631 Coyote Street
Nevada City, CA 95959

This letter submitted to: <https://www.fs.usda.gov/r05/tahoe/projects/302695>

RE: Pacific Crest Trail Association's Comments/Objection for the Tahoe National Forest E-Bike Trail Designation Project Final Environmental Assessment (EA) and Draft Decision Notice (DN).

Dear Supervisor Waters,

I am writing on behalf of the 14,000+ member Pacific Crest Trail Association (PCTA). PCTA is the U.S. Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails is rooted in the 1968 National Trails System Act, and is further supported in the [PCT Foundation Document](#), and the PCTA's Memorandum of Understanding with the federal and state agencies in the collaborative management of the PCT. As such, it is the PCTA's role to work with the U.S. Forest Service to ensure the best possible management of the PCT and the experience it affords trail users, year-round.

PCTA has reviewed the Tahoe National Forest E-Bike Trail Designation Project Final EA and Draft DN. We support the purpose of the project and the need for managing E-Bike use on the Tahoe National Forest that incorporates an agency-wide approach. The PCTA supports the new trail designations for Class 1 E-Bikes (motorized), *given that the new trail designations do not interfere with the nature and purposes of the PCT*. We support the promotion and development of safe and sustainable recreation opportunities on public lands while continuing to meet responsibilities to protect and preserve valuable public resources.

One of those public resources is the congressionally designated PCT, traveling north-south on the Forest through the Truckee, Sierraville, and Yuba River Ranger Districts. The National Trails System Act designated the PCT as one of the nation's first National Scenic Trails, and the Forest Service is responsible for managing the lands along the PCT in a manner that harmonizes with the nature and purposes for which the PCT was designated. The Act states, "Other uses along the trail, which will not *substantially interfere with the nature and purposes of the trail*, may be permitted by the Secretary", and that "...efforts shall be made to avoid activities incompatible with the purposes for which such trails were established."

Part of the PCT's nature and purposes, as described by the newly released PCT Foundation Document, approved by the Pacific Southwest Regional Forester, is that "Collaborative management ensures the Trail is preserved for the conservation, public use, enjoyment, and appreciation of the nationally significant scenic, historic, natural, and cultural quality of the areas through which the Trail passes." Building upon this, the PCT Comprehensive Management Plan (PCT Management Plan) also states, "It is anticipated that even though some resource activities may occur immediately adjacent to or across the trail, the agencies will protect the integrity of the trail proper by *modifying management practices as needed*." With that said, PCTA supports the project, *given that the Summit Lake Trail proposed for E-bike*



use be removed and/or excluded from designation to reduce the potential impacts to PCT users and carry out the intent of the National Trails System Act and the PCT Comprehensive Management Plan.

The PCTA requests that the following trail be excluded/removed from the project for potential E-bike designation and use:

- **Summit Lake Trail – 15E09**

- *The PCTA objects to the designation of the Summit Lake Trail for Class 1 E-Bike use, as well as the development of motorized routes/roads “along” the PCT, per congressional direction from the Act. The one and only explicitly prohibited activity addressed in the Act is the use of motorized vehicles, not only “on” but “along” national scenic trails. “The use of motorized vehicles by the general public along any national scenic trail shall be prohibited...”. As such, designated a motorized trail along the PCT would not comply with plain statutory direction.*
- The PCT is to be managed as a congressionally designated area and not solely as a 24” trail tread, as directed by the 2012 Planning Rule & Directives.
- The Summit Lake Trail crosses the PCT behind the Interstate 80 west rest stop and is proposed to be designated for Class 1 E-Bike use. This trail is not a motorized trail/route, and if designated, it will likely increase the illegal use on the PCT, which is currently unregulated and unmanaged by the Tahoe National Forest due to staffing and funding limitations.
- The designation of the Summit Lake Trail for E-bike use (motorized) directly conflicts with existing management of the PCT on other USFS units in which the trail passes.
 - *Standard – (MA-PCT-STD-03) New motorized routes are prohibited within the corridor unless the route is required by law to provide access to private lands, reduces environmental impact, or is the only prudent and feasible option. This standard does not prohibit the designation of unauthorized routes through site-specific travel management decisions. Site-specific travel management decisions about new routes and unauthorized routes are made at the project level (Land Management Plan – Inyo NF; Pacific Crest National Scenic Trail Corridor).*
- As stated on page 21 & 116 of the Final EA, the Summit Lake Trail’s designed use is for equestrians (pack), which is incorporated into the current trail design and construction. The trail itself is steep and rocky, with constructed rock check-steps and waterbars for functionality and to accommodate the terrain and the specific use of the trail. This type of trail construction is not suitable for wheeled traffic and if designated for E-bike use, there will be a significant increase in resource damage and damage to constructed trail features.
- Adequate access to the Summit Lake Trail is unavailable. Currently, trail access is from the Interstate 80 west rest stop and day use area. This is not a suitable Trailhead due to the on-going management issues with Cal-Trans and the restricted access. With that said, it is not accurate to assume that the Summit Lake Trail will provide adequate access and connectivity to other trails in the area.
 - Connectivity to the Castle Peak area and trails (Pines to Mines) is already planned for through the development of the Castle Pass Multi-Use Trailhead. The new TH will serve the area and its users, providing direct access to Pines to Mines and short-distance trails in the area, such as Hole in the Ground or the Donner Lake Rim Trail.

Supervisor Waters, we appreciate your time and consideration of PCTA’s objection to the Tahoe National Forest E-Bike Trail Designation Project. We are supportive of the project overall if the PCT is adequately

protected and proposed E-bike use is properly managed through appropriate trail designations. We look forward to working with you and your staff. Please reach out if you have any questions.

Thank you,

A handwritten signature in black ink, appearing to read "Connor Swift", is written over a light gray rectangular background.

Connor Swift
Northern Sierra Regional Manager

CC:

Lindsey Steinwachs, U.S. Forest Service, Region 5, PCT Administrator

Joe Chavez, U.S. Forest Service, Tahoe NF, Trails Manager

Katie Mansfield, U.S. Forest Service, Tahoe NF, Truckee RD, Wilderness and Trails Manager

Justin Kooyman, PCTA, Director of Trail Operations