



July 24, 2026

Submitted via: <https://www.fs.usda.gov/r05/tahoe/projects/302695>

Jacqueline Buchanan, Regional Forester, Pacific Southwest Region
USDA Forest Service
Attn: Tahoe National Forest E-Bike Trail Designation Project
1323 Club Drive
Vallejo, CA 94592

Responsible Official:
Amber Waters, Acting Forest Supervisor, Tahoe National Forest
631 Coyote Street
Nevada City, CA 95959

Name of Affected National Forest(s) and/or Ranger District(s):
Tahoe National Forest, specifically its American River Ranger District, Yuba River Ranger District, Truckee Ranger District, and Sierraville Ranger District

Subject: Objections, Tahoe National Forest E-Bike Trail Designation Project (ELMS #302695)

Regional Forester Buchanan:

Back Country Horsemen of America (BCHA), Backcountry Horsemen of California (BCHC) and its Mother Lode Unit respectfully submit these Pre-Decisional Objections pursuant to regulations at 36 CFR §218.8 regarding the June 2026 Final Environmental Assessment (EA) and Draft Decision Notice (DN) for the Tahoe National Forest E-Bike Trail Designation Project. We note that the Tahoe National Forest (TNF) chose not to circulate a Draft EA for public review and comment, as allowed under recently revised regulations. Despite recommendations made in our public scoping comments, the Final EA and resultant Draft DN fail to address our chief concerns associated with the E-Bike Trail Designation Project.

[Our Understanding of the Proposed Project](#)

The Draft DN would authorize Class 1 e-bike use on an approximately 143-mile trail system of lands managed by the Tahoe National Forest (TNF). According to the Draft DN, to date the TNF:

Has designated 103 miles of non-off-highway vehicle trails (i.e., roads and trails designated for motor vehicle use) as open to Class 1 E-Bikes (80 miles currently existing and available for use and 23 miles yet to be constructed) [p.1, Purpose and Need for Action].

Of the proposed 143 miles of National Forest System trails proposed for use by Class 1 e-bikes, the Draft DN states that:

119 miles are existing routes currently available to visitors for hiking, mountain biking, and equestrian uses,¹ while 24 miles are routes that were approved for non motorized use...but have not yet been constructed [p.2, Selected Alternative Description].

In current Trail Classification Standards (TCS) maintained by the TNF, the following trails proposed for shared use by Class 1 e-bikes include a designed use of Pack and Saddle (i.e., equestrian): Robinson Flat MDW Loop Trail (0.3 mile), Haskell Peak Trail (2.1 miles), Chapman Creek Trail (1.9 miles), Lower Lola Montez Trail (3.3 miles), Summit Lake Trail (1.0 mile), Western States Trail, Poppy Segment (3.8 miles), and North Fork Middle Fork Trail (1.0 mile). These trails total 13.4 miles. The Summit Lake Trail, Lower Lola Montez Trail and Robinson Flat MDW Loop Trail also are listed in the Final EA as including a managed use of Pack and Saddle. Regarding the Summit Lake Trail, which feeds into the iconic Pacific Crest National Scenic Trail, the Final EA (Appendix C, p.116) states that “Equestrians heavily use this trail.” This statement is contradicted by a statement made in the EA analysis that implies that “equestrian use is low” along the three trails that include a managed use of Pack and Saddle. **The Final DN must clarify this discrepancy, which appears to have skewed the EA analysis toward authorizing Class 1 e-bike use on the Summit Lake Trail.**

[Statement that Demonstrates the Connection Between Prior Specific Written Comments on the Proposed Project and the Content of the Objection \(per §218.8\(d\)\(6\)\)](#)

BCHA’s and BCHC’s mission, interests and understanding of the project are described in our October 5, 2025, EA public scoping comment letter for this project. The content of our objection—that is, how the draft decision specifically violates law, regulation or policy—tracks closely with claims regarding deficiencies in the Final EA analysis as described in our public comment letters and detailed below.

¹ Equestrian users are not allowed on the Scotts Flat Trail, because the trail ends at a Nevada Irrigation District campground where horses are not allowed. Additionally, several Parliament Trail System trails (Cheeseburger, Nuthatch, Permagrín, Shimmer, Talon Show, Unkindness, and Worm Up) do not allow equestrian use for safety purposes.

How the Draft Decision Specifically Violates Law, Regulation, or Policy (per §218.8(d)(5))

Claim #1: Final EA and Draft DN Violate NEPA as Horseback Riders Face Unique Risks Associated with E-Bike Use

It is well documented that fast-moving bicycles pose unique challenges to the safety and enjoyment of trails by hikers and equestrians alike, as discussed in detail in our public scoping letter for this project. Indeed, the Final EA refers to this safety concern, where it accurately states the following with respect to User Conflict and User Safety (p.24):

One of the primary contributors to user conflict on trails is the different speeds of users (i.e., visitors using bicycles and/or traveling at higher speeds as compared to those visitors on foot or horseback). Bikers traveling at faster speeds can startle hikers and equestrian users and cause them to move off-trail unexpectedly. Although bikers are supposed to yield to slower-paced users, this is not always the case. Ultimately, conflicts are most frequent on trails that have high levels of use and are used by different users, such as mountain bikers and equestrian users. These types of user conflicts can impact users' recreation experience and cause users to avoid specific trails.

Yet the Final EA serves to brush off the potential for on-trail conflict and resultant safety concerns to horseback riders posed by e-bike use, through use of the unsupported statements such as ...“several aspects of trail etiquette can help mitigate these safety issues” (p.25). To us, that represents merely wishful thinking and is not supported in the EA analysis. To the contrary, our public scoping comments describe numerous mountain bike and e-bike related conflicts that were documented by members of the Gold Country Trails Council (GCTC) over several seasons in the Lone Grave area of the TNF, which is within the proposed Project area. As reported, some GCTC members stated their desire to no longer ride horseback in the Lone Grave area. Yet the Final EA makes no mention of these incidents of documented on-trail conflict and recreational displacement, stating instead that:

Overall, trail users on the 143 miles of trails proposed to allow Class 1 E-Bike use rarely experience safety issues, **as evidenced by the lack of reports or complaints submitted to Tahoe National Forest offices or staff associated with these trails**, thus providing a generally safe recreation experience for all users (p.26, emphasis added).

This, despite the fact that the GCTC submitted a number of trail conflict reports, as cited above, to Forest Service officials over recent years, including summaries of these reports via public comment letters submitted by us and the GCTC regarding the TNF's Pines to Mines Trail Project EA (BCHA and BCHC letters dated July 22, 2023 and January 2, 2024). Therefore, we take issue with the highly generalized and sweeping statements made throughout the TNF's E-Bike Trail Designation Project Final EA that mitigation measures regarding “trail etiquette best practices” are sufficient to address potential safety and conflict issues associated with the proposed

Project. **Such statements ignore the potential for significant on-trail conflict associated with Class 1 e-bike authorization on trails such as the Summit Lake and Lower Lola Montez trails, which are favored by equestrians and, specifically the former trail, which the Final EA indicates is “heavily used by equestrians” (p.116).**

Claim #2: Final EA and Draft DN Violate NEPA by Failing to Disclose and Analyze Potential Cumulative Impacts of Related Actions on National Forest Lands in the Region

Despite our request in BCHA’s and BCHC’s October 5, 2024, public scoping comments, the Final EA made no attempt to disclose and analyze the potential effects of at least five related actions to authorize mountain bike or e-bike use on existing non-motorized trails on national forest lands in the area. The current TNF E-Bike Trail Designation Project EA represents one of at least six distinct bike-related projects of which we are aware that either were proposed or authorized within the past six years. Yet none of the relevant NEPA documents issued to date by the Forest Service disclose the magnitude, geographic extent and potential social and environmental effects of these proposals.

The TNF has authorized or has proposed to authorize Class 1 e-bike use via the following recent projects and associated NEPA analyses:

1. The East Zone Connectivity and Restoration Project EA (DN signed Dec. 2020), which authorized Class 1 e-bike use on 35.5 miles of existing non-motorized trails;
2. The Lone Grave Trail Project Categorical Exclusion (Decision Memo signed Feb. 2022), which authorized new trailhead facilities and construction of up to 8 miles of trail for mountain bike use and that over time appears to have morphed into the approval of 23 miles of mountain bike-optimized trails;
3. The Pines to Mines Trail Project EA (DN signed March 2024) authorized Class 1 e-bike use on 50 miles of existing non-motorized trails and the construction of 23 miles of new trail on which Class 1 e-bike use was authorized;
4. The Lake Tahoe Basin Management Unit’s Basin Wide Trails Analysis Project EA (DN signed Jan. 2026), which included the authorization of Class 1 e-bike use on 112.6 miles of non-motorized trails and the construction of 27.5 miles of new trail on which Class 1 e-bike use was authorized;
5. We understand that the TNF plans to realign a portion of the Hole in the Ground Trail and add several new segments (i.e., broad loops) that presumably would accommodate Class 1 e-bikes. As described on the website of the Truckee Trails Foundation (TTF),² “the Forest Service has begun to assess an alignment for a proposed trail around Andesite Peak and the creation of a single track loop for Hole in the Ground that will stay on public lands. Resource studies have been conducted, though this problem is on hold due to Forest Service staffing

² See: <https://truckeetrails.org/projects/>, Hole in the Ground Trail Loop, which includes a map of the proposal as prepared by the US Forest Service (accessed July 24, 2026).

shortages.” The website provides a link to a US Forest Service-branded map of the proposed trail system; total trail mileage for the reroute and new segments is not provided.

The latter project clearly represents a related action under NEPA, particularly since the Hole in the Ground Trail recently was authorized for Class 1 e-bike use via the Pines to Mines Trail Project EA. It is reasonable to assume that the proposal for the trail around Andesite Peak and other new trails in Hole in the Ground Area (e.g., Lower, Short Loop, Lower Castle Creek) would include authorization for Class 1 e-bike use. Of further relevance is the identification on the map of a “Lola Montez Connection” that would link the proposed Hole in the Ground Trail with the existing Lower Lola Montez Trail. The latter trail is, not coincidentally we assume, included in the current proposal for the TNF’s E-Bike Trail Designation Project EA to be designated as open to Class 1 e-bike use.

We do not believe that the Final EA provides the necessary public disclosure of these related actions. Further, we contest the proposed designation of the **Lower Lola Montez Trail** for Class 1 e-bike use, as doing so would further exacerbate on-trail conflict posed by bike use for riders on horseback (i.e., packstock) and inevitably lead to the displacement of horseback riders from this trail. The TNF assigned the Lower Lola Montez Trail as having a designed use for Packstock and is used and highly regarded by horseback-riding members of Backcountry Horsemen of California and the Gold Country Trails Council.

The TNF’s current Final EA/Draft DN failed to include and disclose a cumulative impact analysis inclusive of these six e-bike projects, which clearly are related in time, spatially and by project type. Based on our objection Claim #1, these projects represent significant actions with potentially cumulative and adverse effects for which the agency has yet to provide the requisite “hard look,” as required by NEPA regarding the social and environmental consequences of these related actions.

The current process of segmenting these e-bike authorizations into a series of smaller actions and to treat such approvals as “minor changes” subject to either a Categorical Exclusion or an EA, obfuscates the necessary assessment of the collective impacts of these projects.

Introducing any motorized trail use, Class 1 e-bike use in these cases, on over 415 miles of existing non-motorized trail (not including the two proposed Hole in the Ground loop trails) would no doubt result in potentially significant changes in recreational use patterns over the short- and long-term, particularly given the displacement of riders on horseback who by nature are specifically attune to safety issues related to fast-moving bicycles on narrow shared-use trails.

In summary, the Final EA and Draft DN for the current TNF E-Bike Trail Designation Project is at odds with the principle of anti-segmentation, which “ensures agencies cannot evade their responsibilities under NEPA by artificially dividing a major federal action into smaller components, each without a significant impact.”³ At most, the TNF has to date considered only the potential impacts of Class 1 e-bike use in isolated analyses, not their collective impact.⁴

[Claim #3: Final EA and Draft DN Violate NEPA by Failing to Disclose Ongoing Conflict and Recreational Use Displacement Associated with Current and Proposed Levels of E-Bike Use](#)

The Final EA and Draft DN violate NEPA by failing to disclose the potential for the displacement of other trail users from trails proposed for use by Class 1 e-bikes and to analyze the social and environmental impact of such recreational use displacement. Were Class 1 e-bike use to be authorized on the trail system under study, ongoing conflict and safety-related hazards would continue to grow with many of the existing sections of trail becoming undesirable for use by hikers and equestrians alike.

As such, we take exception to the erroneous and unsupported conclusions on this topic contained in the Final EA and Draft DN such as the following:

While designating the 143 miles of trails for Class 1 E-Bike use might lead to a minor increase in overall visitation to the Tahoe National Forest, introducing Class 1 E-Bikes on these trails is not expected to alter existing use patterns substantially. (Final EA, p.34)

The introduction of Class 1 E-Bikes is not expected to substantially alter existing recreation use patterns or cause a significant increase in user conflicts or safety concerns. No adverse effects are anticipated to be significant. (Final EA, p.53)

The reality is that patterns of use by equestrians could be substantially altered, based on comments and observations provided by local horseback riders, including those of the Gold Country Trails Council. The significant and adverse effects to persons seeking a peaceful trail ride would not merely be localized but, rather, experienced at a near forestwide scale given the variety of landscapes traversed by the 119 miles of otherwise non-motorized trail proposed for Class 1 e-bike use.

³ Standing Rock Sioux Tribe v. U.S. Army Corps of Engineers, 301 F. Supp. 3d 50, 66 (D.D.C. 2018) (quotations and alterations omitted).

⁴ See Fund for Animals v. Hall, 448 F. Supp. 2d 127, 130, 132–3 (D.D.C. 2006) (finding a NEPA violation where the Fish and Wildlife Service did not prepare an EA or EIS prior to publishing final rules that expanded recreational hunting in wildlife refuges nation-wide even though the individual refuges prepared EAs).

The Final EA and Draft DN fail to address these substantial and potentially significant adverse effects on public use, safety and the potential displacement of hikers and equestrians from the proposed trail system. Viewed in light of other past, present and reasonably foreseeable actions by the Forest Service, as described above in Claim #2, the potential exists for such displacement to occur on significant portions of the over 415 miles of currently non-motorized trails on national forest lands in the area that are proposed for use by Class 1 e-bikes.

[Suggested Remedies that Would Resolve the Objection \(per §218.8\(d\)\(5\)\)](#)

Given the potentially significant and unresolved safety and recreational displacement concerns associated with Class 1 e-bike use on select shared-use trails, including the **Summit Lake and Lower Lola Montez trails**, we ask that the TNF reevaluate the inclusion in the current EA of National Forest System trails that have a current designed and/or managed use that includes Pack and Saddle. Not only are these trails enjoyed by riders on horseback, but equestrian use of the Summit Lake Trail, for example, is heavy and is unlikely to coexist safely with Class 1 e-bike use on this steep and rocky trail that possesses limited options for persons on e-bikes to safely step off the trail to yield to oncoming parties on horseback. In addition, the Summit Lake Trail represents an important feeder trail to the **Pacific Crest National Scenic Trail (PCT)** for hikers, backpackers and persons using pack and saddle stock. The PCT is an iconic trail designated by Congress as such and on which motorized uses, including Class 1 e-bike use, are not authorized. Consequently, approval of e-bike use on the Summit Lake Trail no doubt would increase the likelihood of illegal e-bike trespass on the PCT.

The Final EA and Draft DN for the TNF E-Bike Designation Project is inadequate to wholly inform the necessary decision making required by NEPA and Forest Service regulations. Accordingly, the TNF must prepare a detailed cumulative impacts analysis that discloses the magnitude of the Forest Service's broader and potentially significant plans regarding e-bike use throughout the TNF and adjacent national forest lands. These plans include all past, present and reasonably foreseeable future actions of a project type similar to that of the current proposal. The analysis should also include a detailed education, monitoring and enforcement plan. Such a plan should be developed in concert with relevant stakeholders with one objective being the monitoring and detection of early warning signs and actions to prevent e-bike induced conflict and displacement of traditional trail users. Importantly, the authorization of Class 1 e-bike use should be predicated and made contingent upon the agency's ability to:

1. Take corrective actions if monitoring were to detect the potential for substantial conflict with, or potential displacement of, authorized non-motorized uses; and
2. Adequately enforce compliance of authorized uses on the affected trail system. This would include proactive steps to discourage unauthorized use by classes of e-bikes other than Class 1.

We recognize that education and enforcement would remain the primary tools employed by the TNF to encourage user compliance throughout the affected trail system. We recommend that the suggested education, monitoring and enforcement plan detail specific actions that would be taken if monitoring were to detect undesirable trends. A management response could be structured such that enhanced signage and visitor education would represent a first-line response when monitoring thresholds are triggered. We provided an outline of such a proposed monitoring program in our formal objections (dated January 2, 2024) to the TNF's approval of its Pines to Mines Trail Project EA.

[Supporting Reasons for the Reviewing Officer\(s\) to Consider \(per §218.8\(d\)\(5\)\)](#)

Founded in 1973, BCHA is a longstanding partner with the U.S. Forest Service. BCHA members are active in 31 states in over 210 chapters located across the country. Since 1995, BCHA volunteers have contributed a value of over \$200 million in in-kind labor and materials in order to maintain trails, horse camps and assist ecological restoration efforts on public lands. The vast majority of our volunteer service (nearly 75 percent) occurs on national forests. In 2025 alone, BCHA volunteers contributed 230,100 hours working hand-in-hand with local and federal land managing agencies.

BCHA continues to maintain successive five-year Memorandum of Understanding (MOU) with the U.S. Forest Service in order “to document the cooperation between the parties to continue to develop and expand a framework for the Forest Service and BCHA to plan and implement mutually beneficial programs, projects, training, and other equestrian opportunities at the national, regional, and local levels” (FS Agreement No. 21-MU-11132424-262). Our volunteers and their families enjoy recreational horseback riding on trails throughout the TNF. One reason our volunteers use and enjoy non-motorized trails within the TNF is the ability to access trails that provide an escape from the motorization and mechanization of modern society.

[Conclusion](#)

We appreciate the ability to submit these pre-decisional objections. It is our belief that only through strong partnerships and effective collaboration can our mutual goal of maintaining publicly-supported trail systems be achieved. For the foregoing reasons, we object to the Final EA and Draft DN, and request review of these decisions. Pursuant to 36 C.F.R. § 218.11 we request a meeting with Forest Service personnel to discuss issues raised in our objections.

The stark reality for riders on horseback is that, even if only a minority of e-bike riders choose not to follow the rules or obey the law, the risk and adverse consequences to our safety and enjoyment of National Forest System trails is high in the presence of fast-moving bicycles.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randy Rasmussen", is shown on a light yellow rectangular background.

Randy Rasmussen ([Lead Objector, per §218.8\(d\)\(3\)](#))

Director, Public Lands & Recreation

Back Country Horsemen of America

P.O. Box 1180

Columbia Falls, MT

Phone 860-586-7540 | www.bcha.org

Doug Dollarhide

President

Backcountry Horsemen of California

14110 Campbell Ave.

Escalon, CA 95320

Kelly Rowell

President

Backcountry Horsemen of California

Mother Lode Unit

P.O. Box 702

North Highlands, CA 95660