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Comments: I request the inclusion of e mountain bikes (eMTBs) on the trails in the Backyard project. Extensive research of studies and environmental analyses(EA) performed by various national forests and the BLM, discussions with land managers in Colorado and several other states where eMTBs have been approved, and discussions with other Colorado mountain bike organizations shows that eMTBs have little to no impact. It's important to note that all the approved Forest Service decisions resulted in a Finding of No Significant Impact. The research showed several common themes:

- eMTBs would not significantly affect crowding on the trails and likewise not lead to degradation of other users experiences or large increases in user conflicts (several land mangers emphasized conflicts were caused by the person and not the type of bike involved).

- Available research shows very little difference between traditional bikes and eMTBs regarding impacts on tread wear, erosion, sedimentation, noise, botanical resources, and wildlife.

- Speed and hence safety is often cited as a major concern but the EAs concluded the speed differential between the two was not significant enough to warrant concern. Speed on the one trail in Tahoe National Forest open to eMTBs at the time showed the highest speeds were posted by advanced riders on traditional bikes under all trail conditions and gradients.

- EAs concluded bikers on traditional bikes and eMTBs had the same risk of injury and need for rescue, even in very remote trail systems.

- None of the EAs expressed concerns about unqualified riders going into the backcountry and needing rescue. Discussions with land managers reinforced this conclusion as none indicated this had happened.

- The EAs discussed the added benefit of making tails more accessible to those bikers who because of age or health needed eMTBs to continue to enjoy the sport as is my case.

- The EAs and all the locations that have approved eMTBs limit the use to only Class 1 pedal-assist bikes with a top assist speed of 20MPH as I would recommend here. As an aside, I could not find any mountain bike manufacturers who make a Class 2 throttle mountain bike.

- Finally, this area is close to the Peninsula which has allowed eMTBs for 5 years with no issues and is also fairly isolated from the rest of the trail systems in the County. It seems a logical place to allow eMTBs.

Below is a list of links to the EAs found in this research.

1.East Zone Connectivity: Truckee & Carson Ranger Districts/Tahoe NF. Final 3/15/21  
<https://usfs-public.app.box.com/v/PinyonPublic/folder/158227042396>

2. Fishlake Basin: Intermountain Region, Fishlake NF. Final 5/23/22  
<https://www.fs.usda.gov/project/?project=60002>

3. Pines to Mines: Yuba, Truckee, & Sierraville RD's/Tahoe NF. Final 3/14/24  
<https://www.fs.usda.gov/project/tahoe/?project=61221>

4. Womble & Syllamo: Caddo, Mena, Oden, Womble, & Sylamore RD's/Ozark-St. Francis & Ouachita NF's. Final 9/16/24 <https://www.fs.usda.gov/project/?project=62170>

5. Bend Area: Pacific Northwest Region/Deschutes NF, Draft EA 7/2/24  
<https://www.fs.usda.gov/project/deschutes/?project=66475>

6. Tahoe Basin Wide: Lake Tahoe Basin Management Unit/Tahoe NF. Draft EA 9/26/24  
<https://www.fs.usda.gov/project/?project=54566>

7. Jackson Area: Jackson RD/Bridger-Teton NF. Draft EA 1/23/25  
<https://www.fs.usda.gov/project/?project=64890>

8. NPS System Wide Ruling: 10/20/20 <https://www.govinfo.gov/content/pkg/FR-2020-11-02/pdf/2020-22129.pdf>

9. Univ of Vermont Study on eMTBs: [https://www.uvm.edu/sites/default/files/Center-for-Rural-Studies/2022\\_Vermont\\_Electric\\_Mountain\\_Bike\\_Research\\_Report.pdf](https://www.uvm.edu/sites/default/files/Center-for-Rural-Studies/2022_Vermont_Electric_Mountain_Bike_Research_Report.pdf)