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Comments: I am submitting this formal objection to the proposed authorization or expansion of electric bicycle (e-bike) use within 143 miles of recreational trails in the Tahoe National Forest. This objection is based on significant deficiencies in the Forest Service's analysis and disclosure of user conflicts, public safety risks, and the incompatibility of e-bike use with existing high-intensity events on these trails. As currently presented, the proposal fails to adequately evaluate foreseeable impacts associated with mixed-use conditions involving equestrians, trail runners, and high-speed mechanized users in a remote backcountry setting.

### 1. Failure to Adequately Address Equestrian Safety and User Conflict

The proposal does not sufficiently analyze or mitigate conflicts between e-bike users and equestrians. Horses are highly sensitive animals that can react unpredictably to rapidly approaching mechanized users, especially those traveling uphill or at higher speeds. The introduction of e-bikes-often quieter and faster than traditional bicycles-intensifies this risk.

Key deficiencies include:

- Lack of collision risk analysis specific to horse-bike interactions on narrow, singletrack trails.
- No enforceable mitigation measures (e.g., speed limits, yield enforcement, seasonal restrictions) that would meaningfully reduce conflict.
- Insufficient recognition that existing trail design and sightline limitations increase the likelihood of sudden encounters.

These omissions are especially concerning given the longstanding equestrian use of these trails and the established expectation of a safer, non-motorized experience.

### 2. Public Safety Risks in a Remote Backcountry Environment

The project area is characterized by limited access, long emergency response times, and difficult terrain. Introducing higher-speed mechanized use under these conditions materially increases the consequences of accidents. The analysis fails to adequately address:

- Emergency response limitations, including delayed evacuation for injured riders or equestrians.
- Increased severity of accidents due to higher travel speeds associated with e-bikes.
- Cumulative risks when multiple user groups occupy confined trail corridors.

In remote environments, even minor collisions can escalate into life-threatening situations. The proposal does not demonstrate that the Forest Service has taken a "hard look" at these foreseeable risks or developed adequate safeguards.

### 3. Incompatibility with High-Use Events (Tevis Cup and Western States Endurance Run)

The proposal fails to evaluate the profound conflicts that will occur during major, permitted events such as the Tevis Cup (Western States Trail Ride) and the Western States Endurance Run. These events draw large numbers of equestrians, runners, and support personnel, often under physically demanding and time-sensitive conditions. During these periods:

- Trails experience extreme congestion and reduced maneuverability.
- Participants are often fatigued, limiting their ability to react quickly to unexpected hazards.
- The presence of e-bikes introduces speed differentials and unpredictable passing situations.

The Forest Service has not:

- Assessed event-specific conflict scenarios.
- Proposed temporary closures or use restrictions during these high-visitation periods.
- Evaluated whether the introduction of e-bikes is fundamentally incompatible with the safety requirements of these events.

This omission represents a substantial gap in the environmental review and undermines the agency's duty to ensure safe and compatible multiple use.

#### 4. Inadequate Consideration of Peak Use Conditions

Beyond organized events, the proposal lacks a meaningful analysis of peak recreation periods, when:

- User densities are highest,
- Trail congestion is most acute, and
- Conflicts between user groups are most likely to occur.

The environmental document appears to rely on average use conditions and irrelevant literature citations, which fails to capture the real-world conditions under which accidents and conflicts are most probable in the TNF trail system. These trails were built by and for hikers, packers and horsemen. Today, they are overrun by mountain bikers, who are newcomers to mountain recreation and rarely share a centuries old outdoor ethic, commitment to multiple use and respect for other trail users.

#### 5. Requested Actions

Given the deficiencies outlined above, I respectfully request that the Forest Service:

- Reanalyze user conflict and safety risks with specific attention to equestrian interactions and speed differentials.
- Develop enforceable mitigation measures, including but not limited to:
  - + Speed limits,
  - + Yield protocols with clear signage and education,
  - + Seasonal or conditional restrictions.
- Evaluate and implement event-specific protections, including temporary prohibitions on e-bike use during the Tevis Cup and Western States events.
- Incorporate peak-use analysis to accurately assess real-world conditions.
- Consider alternatives, including maintaining current non-motorized designations on sensitive trail segments.

The current proposal does not provide sufficient analysis or mitigation to ensure safe, compatible use of the trail system. The introduction of e-bikes in this context presents foreseeable and significant risks that have not been adequately addressed. Until these deficiencies are resolved, the proposal should not be approved. Thank you for your consideration of this objection.

Sincerely,

Steve Kohlmann, PhD