Vail Valley Mountain Trails Alliance
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March 23, 2026

Project Name: Allowance of Class 1 E-Bikes on Designated Mountain Bike Trails
NEPA: DOI-BLM-CO-G020-2026-0020-EA

Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Rd
Silt, CO 81652

Dear Reviewing Officers,

On behalf of the Vail Valley Mountain Trails Alliance (VVMTA), thank you for the opportunity to comment on the Environmental Assessment regarding class 1 e-bike access on designated mountain bike trails.

VVMTA's comments are specific to the trail systems and areas identified in the proposal that are located within Eagle County, as that is the landscape in which our organization operates and the area on which our work and expertise are focused.

VVMTA recognizes that e-bikes are an important and growing part of the recreation landscape. We believe there is both a need and an opportunity for class 1 e-bikes within the Eagle and Gypsum area trail system. Class 1 e-bikes can expand access to public lands by creating more inclusive recreation opportunities for people of varying ages, abilities, and physical capacities. At the same time, we do not support a blanket approach that would open all trails currently open to mountain bikes to class 1 e-bikes without management considerations. In our view, class 1 e-bike access should be evaluated and implemented on a trail by trail basis, with thoughtful consideration of trail character, user conflict, safety, sight lines, existing travel patterns, resource sensitivity, and jurisdictional complexity.

E-bikes are undoubtedly a controversial and complex topic. VVMTA addresses e-bike access on a case by case basis because we believe there are trails where class 1 e-bikes may be appropriate and places where they may not. As trail users and trail advocates, we continue to see steady growth in e-bike use. The reality is that e-bikes are not going away and will likely continue to grow in popularity. We believe the best long term outcome for all trail users is a proactive approach that creates opportunities for management, education, and adaptive decision making, while protecting trail experiences and resource values.

We encourage BLM to revise the current proposal so that it does not automatically open all trails currently open to mountain bikes to class 1 e-bikes. Instead, BLM should analyze and consider a modified alternative that allows class 1 e-bike access only where appropriate and only with clear management measures in place. That modified alternative could include trail specific

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analysis, directional management where warranted, user education, coordinated implementation across jurisdictions, monitoring, and adaptive management.

VVMTA's support for class 1 e-bike access is limited to systems where effective policies, education, and coordination are in place. We do not support allowing class 2 or class 3 e-bikes on non-motorized soft surface trails.

We also believe that management should distinguish between areas already managed for concentrated recreation and areas where the desired setting remains lower intensity and more traditionally non-motorized. In our view, class 1 e-bike opportunities are more likely to be appropriate in already impacted and recreation focused areas such as Hardscrabble SRMA and Gypsum Red Hill Area, while other areas may warrant continued exclusion or additional analysis before any decision is made.

Finally, it is important that any BLM decision accounts for the practical realities of implementation. A management framework that relies primarily on enforcement without clear rules, education, trail specific designations, and coordination with adjacent land managers is unlikely to succeed. A proactive and clearly communicated approach will provide a better long term outcome for trail users, land managers, and the resource itself.

Thank you for your consideration and for your work on this issue. VVMTA appreciates the opportunity to provide comments and looks forward to continued collaboration on a thoughtful and locally responsive approach to trail management.

Sincerely,



Ernest Saeger
Executive Director
CC: VVMTA Board of Directors

See Appendix A: Recommended Management Measures

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Recommended Management Measures:

1. Trail specific analysis and designation

BLM should not adopt a blanket approval that opens all trails currently open to mountain bikes to class 1 e-bikes. Instead, individual trails and trail systems should be reviewed to determine where class 1 e-bike use is appropriate, where restrictions are necessary, and where such use is not suitable. That review should consider:

- Existing and historic travel patterns
- Sight lines and trail alignment
- Speed differentials and safety concerns
- Trail width and passing opportunities
- User conflict potential
- Resource sensitivity
- Jurisdictional and easement constraints

2. Focus access in existing recreation areas

VVMTA believes there is a need and opportunity for class 1 e-bikes in heavily used areas that are already impacted and managed specifically for recreation. This includes areas near town such as:

- Hardscrabble SRMA
- Gypsum Red Hill Area

Areas that are not managed for high recreation use should remain managed as truly non-motorized where appropriate. Based on current conditions and management objectives, areas such as Catamount Creek, Horse Mountain, Sheep Creek, and Windy Point may warrant continued exclusion or additional analysis before any class 1 e-bike designation is considered.

BLM should also state clearly that class 1 e-bikes are not and will not be allowed in Wilderness, Wilderness Study Areas, or other areas not managed for mechanized recreation.

3. Directional restrictions on select trails

VVMTA has serious concerns about class 1 e-bikes changing historic traffic patterns on trails that have long functioned primarily as downhill mountain bike routes. Because class 1 e-bikes make climbing easier, they create the potential for more uphill travel on trails where speed differentials, blind corners, and user expectations make that unsafe or disruptive.

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For this reason, BLM should evaluate whether some mechanized trails should remain bi-directional for regular bikes, hikers, and equestrians, but be managed as downhill only for class 1 e-bikes where conditions warrant.

Examples of trails in the Hardscrabble SRMA that may merit further evaluation for downhill only class 1 e-bike use include:

- Pool & Ice
- Redneck Ridge
- Will's Thrill
- Dirt Surfer 2.0
- Elmer's
- World's Greatest
- Abram's Ridge
- Mike's Night Out
- Dead Cow
- Firebox

These examples are offered for further evaluation rather than as final recommendations, and any determination should be based on site specific analysis, existing travel patterns, safety considerations, and coordination with other stakeholders as necessary.

Directional management should be supported by clear signage at trailheads and key intersections, consistent mapping, and public communication through platforms such as Trailforks and MTB Project.

4. Class 1 e-bike sticker identification program

BLM should consider establishing or supporting a class 1 e-bike identification program so compliant bikes can be easily identified.

Key elements could include:

- A physical sticker affixed to the bike with a unique identifier and year or season of validity
- A simple certification process through participating local bike shops
- Verification that the bike is pedal assist only, has no throttle, is limited to class 1 functionality, and has not been modified beyond class 1 standards
- A short education component required before sticker issuance

This would give land managers, rangers, and trail users an immediate visual cue to distinguish compliant class 1 e-bikes from class 2, class 3, or other motorized devices.

5. Signage and public communication

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Implementation should include clear, consistent signage and public facing communication. BLM should consider adding a small e-bike panel to existing trail signs that displays:

- Class 1 e-bike allowed
- Class 2 and class 3 prohibited
- Directional restrictions where applicable

Maps, digital trail platforms, and agency outreach should all reflect the same rules.

6. Education and etiquette requirements

Any class 1 e-bike implementation should be paired with a clear education program. That program should explain:

- Where class 1 e-bikes are allowed and not allowed
- Yield expectations
- Safe speed and passing behavior
- Communication practices, including use of a bell or verbal notice when passing
- Awareness around horses, hikers, wildlife, and mixed use trail conditions

7. Cross boundary coordination and approval

Many Eagle area trails connect across multiple jurisdictions and easements. Any BLM decision should be coordinated with adjacent land managers so that connected systems have consistent rules, signage, maps, and public messaging.

VVMTA recommends that trails crossing jurisdictions or easements require written approval or documented coordination from all affected land managers prior to final operational designation for class 1 e-bike use.

Affected land managers may include:

- Town of Eagle Open Space
- Eagle County Open Space
- Eagle Valley Land Trust

Examples of trails that may warrant cross boundary coordination and further evaluation include:

- Abram's Gulch
- Abram's Ridge
- Lov Connection
- Adams Way
- 3 Sisters

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- Haymaker
- School House Rocks
- Kill Bill
- Mayer's Gulch
- 3rd Gulch
- Bailey
- Riddle
- Pool & Ice

These examples are included to illustrate the need for coordination, not as a final or exhaustive list.

8. Monitoring and adaptive management

Any decision should include ongoing monitoring and an adaptive management framework. Monitoring should track:

- Compliance rates
- Conflict reports
- Directional use compliance
- Wildlife disturbance reports
- Trail condition indicators
- Public feedback and observed use patterns

If impacts become unacceptable, BLM should retain the ability to implement additional management responses, including route specific restrictions, additional directional controls, increased signage and education, or removal of class 1 e-bike access on specific trails.

9. Limit implementation to class 1 only

BLM should clearly state that any approval applies only to class 1 e-bikes. VVMTA does not support allowing class 2 or class 3 e-bikes on non-motorized soft surface trails.