



Our mission is to create and sustain the best possible mountain bike trail system and experience in the Roaring Fork Valley.

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March 24, 2026

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Submitted via BLM eplanning website:

<https://eplanning.blm.gov/Project-Home/?id=4CBC8245-E20C-F111-8406-001DD8029ED0>

Re: Scoping Comments: BLM-CRVFO - Allowance of Class 1 E-Bikes on Designated Mountain Bike Trails - DOI-BLM-CO-G020-2026-0020-EA

Dear Jacob, Alan, Hilary,

The Roaring Fork Mountain Bike Association (RFMBA) appreciates the opportunity to provide scoping comments during the 30-day public scoping period **February 23, 2026 through March 25, 2026** for the Environmental Assessment (EA) evaluating whether, and on which routes, **Class 1 e-bikes** may be allowed on existing designated non-motorized mountain bike trails within the Colorado River Valley Field Office (CRVFO).

RFMBA, a Chapter of the International Mountain Bicycling Association, is a 501(c)(3) charitable organization.

About RFMBA and our interest in this decision:

RFMBA is a primary local trail stewardship organization in the Roaring Fork Valley, operating from New Castle to Aspen. We work collaboratively with land managers, local governments, user groups, staff, and volunteers to plan, build, maintain, and steward sustainable trail experiences, all while promoting responsible trail use and education. The CRVFO includes popular singletrack systems, several of which RFMBA has been deeply involved in evolving and sustaining over the past 15+ years.

We recognize that Class 1 eMTB access is a nuanced topic within our membership, and the broader trail community. Some riders have requested expanded Class 1 access for years; others have concerns about changing use expectations and management on existing trails. Given RFMBA's stewardship role and on-the-ground

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experience, we believe it is important to provide constructive input and help ensure this EA is rigorous, transparent, and workable for long-term trail management.

What we understand CRVFO is proposing:

As described in the scoping materials, CRVFO is preparing an EA to assess on which, if any, existing designated non-motorized mountain bike trails Class 1 e-bikes would be allowed, including consideration of implementation through route-by-route, or area by area, travel management decisions and applicable regulations. We also note:

- Class 1 e-bikes are currently allowed on designated mechanized trails at the BLM CRVFO's Grand Hogback Trail System (approximately 18 miles), and the scoping materials state no user conflict or trail maintenance issues have been identified there.
- The scoping materials indicate “all mechanized trails” may be considered with exceptions due to U.S. Forest Service (White River National Forest) segments not being considered at this time (e.g., Scout Trail / 8281T; Arbaney Kittle / 8342–8341; Mansfield Ditch (lower BLM portion) / 8131L). RFMBA requests that these trails would be re-opened for consideration of Class 1 e-bike access by the CRVFO, in the event that the USFS, in the future, opens a process to evaluate similar access allowance changes.
- The scoping materials define e-bikes and classes under BLM regulations (including the Class 1 definition and the broader e-bike definition), and we rely on those definitions in these comments.

RFMBA's overall approach:

RFMBA supports a localized, area and trail-specific, public process for considering Class 1 eMTB access. Our comments are focused less on a blanket outcome and more on ensuring the EA establishes clear criteria, analyzes the right issues, and sets up an implementation path that maintains sustainable trails and high-quality experiences for all riders and trail users. We also encourage the BLM to continue treating Class 1 pedal-assist e-bikes distinctly from other classes, consistent with the proposal's focus on allowance for Class 1 rather than Class 2 or Class 3 usage on existing trails.

Recommendations for a Balanced Environmental Assessment:

To address the nuances of this transition, RFMBA recommends the EA focus on the following pillars:

- **Comprehensive Review of External Case Studies:** We recommend the EA include a comparative analysis of other regions that have implemented Class 1 access. Specifically, the CRVFO should investigate and address reports regarding whether land managers in areas including the BLM's Moab Field Office, BLM's North Fruita Desert, the City of Glenwood Springs, Colorado Mountain College's Spring Valley Campus trail network, and Jefferson County Open Space, have experienced increased user conflicts, trail surface damage, or elevated accident rates following eMTB allowance.
- **Proactive Agency Leadership and Coordination:** While many CRVFO trails are contiguous with or managed cooperatively with local governments (including Pitkin County, Eagle County, Town of Eagle, Town of Carbondale, and Town of New Castle) we encourage the BLM to provide clear leadership on this topic. Rather than waiting for a universal consensus from all local partners up

front, the BLM should set a definitive regulatory framework that adjacent land managers can then use to inform their own future access studies.

- **Balancing System-Wide Clarity with Site-Specific Needs:** RFMBA recognizes that a system-wide approval of Class 1 e-bikes would minimize user confusion and simplify signage and enforcement across the field office. However, the EA must allow for trail or area specific limitations where existing conditions demand a more cautious approach. For example, as noted by the Red Hill Council, the front side of the Red Hill SRMA already suffers from significant overuse and high congestion. In such cases, specific front-side trail limitations may be appropriate to preserve safety and the user experience, while allowing Class 1 access to the remaining trail network via the Sutey Ranch Trailhead.
- **Preserving the Traditional Riding Experience:** Any change in allowed uses must not inadvertently degrade the experience for traditional mountain bikers. The EA should explicitly analyze how the BLM will maintain "human-powered" opportunities and avoid unintended consequences in connected trail networks.
- **Adaptive Management and "Triggers" for Change:** Implementation must include a pragmatic monitoring framework with clear triggers for management changes. If monitoring reveals measurable increases in trail wear or user conflict, the BLM should have a pre-defined plan to escalate education, update signage, or adjust access to improve public confidence in the process.
- **Support for Adaptive Athletes:** We recommend the EA include a clear section on adaptive cycling considerations. This ensures that accessibility needs for riders using adaptive devices (which in some cases may not fit within Class 1 e-bike definitions) are approached fairly and transparently within applicable policy.

RFMBA's goal is to ensure that the Roaring Fork Valley remains a world-class destination for all mountain bikers. By providing agency leadership, ensuring careful implementation, and respecting local voices, including the Red Hill Council and others, the BLM can move forward in a way that respects the history of our trails while looking toward the future.

RFMBA appreciates CRVFO's decision to evaluate Class 1 e-bike access through a transparent NEPA process and to solicit public input early. Thank you for ensuring the EA evaluates workable alternatives, and includes a credible monitoring and adaptive management plan that supports sustainable trails and positive user experiences. RFMBA looks forward to continued collaboration with the BLM CRVFO, local land managers, and the public as the EA progresses. Feel free to contact me with any questions at (970) 948-3486 or mike.pritchard@rfmba.org.

Sincerely,



Mike Pritchard
RFMBA, Executive Director