

Jason Brey, District Ranger  
Hebgen Lake Ranger District  
P.O. Box 520  
West Yellowstone, MT 59758  
[jason.brey@usda.gov](mailto:jason.brey@usda.gov)

Ed Ryberg  
Box 1551  
West Yellowstone  
Montana 59758  
[larsenryberg@gmail.com](mailto:larsenryberg@gmail.com)  
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Scoping Comments for the proposed Rendezvous Ski Trail Improvements Master Development Plan

Dear Jason,

I hope you enjoyed your Acting Supervisor assignment. I'm very happy to have you back as the Hebgen Lake District Ranger. I appreciate the opportunity to comment on, and to make suggestions to improve, the proposed action with regard to the Rendezvous Ski Trail Improvements and Master Development Plan (MDP).

My suggestion to improve this proposed action is to change trail status of the Rendezvous ski trails and the Yellowstone Short Line Trail, (including the proposed linkage of these trails) on the Forest's Motor Vehicle Use Map (MYUM), to: "Trails open to class one e-bikes only", as provided for in Forest Service Manual (FSM) 7711.2, 6.; g. Bicycle use is seasonally allowed on these trails and these actions will provide for significant new opportunities for currently underserved physically challenged and/or elderly e-bike riders to enjoy their National Forest at no additional cost by using existing trails and facilities. It is also consistent with the guiding philosophy of the MDP that "every effort will be made to enhance year-round multiple use access".

Guidance to manage future e-bike use on National Forest and Grasslands, issued in 2022, states that . . . "Simply put, e-bikes allow more people to enjoy National Forests and Grasslands. The technology has the potential to include older Americans and attract more diverse users to explore their public lands in a socially and ecologically responsible way." Forest Service policy, (FSM 7702) is "(to) consider emerging technologies (such as e-bikes) that are changing the way people access and recreate on National Forest System (NFS) land. For example where suitable for use, e-bikes may provide new opportunities for individuals who might otherwise be prevented from experiencing an NFS trail without assistance from an electrical motor." Class one e-bike are compatible with and comparable to bicycles, and have similar environmental effects. The Rendezvous trails are uniquely well suited to provide enjoyable and safe recreation opportunities to physically challenged and/or senior e-bike riders. Including these suggested travel management changes, within the broader context of the proposed action, will also provide an excellent opportunity to reevaluate out dated travel management constraints in the "2016 Greater Yellowstone Ecosystem Grizzly Bear Conservation Strategy".

I grew up spending summers at my family's summer home at Romsett and I have been riding bikes on the roads and trails of the Hebgen Lake Ranger District for over six decades and on the Rendezvous trails since their inception. However, as time has progressed I must admit that I've aged out of my ability to safely and enjoyably ride many of the district trails. Fortunately for me, the advent of peddle assisted e-bikes coincided with my declining physical

capabilities. While I waited until I turned 70 to acquire one, it has been a game changer allowing me to once again ride like I did when I was young, but more carefully, since when you're young and fall you bounce but when you're elderly and fall you break.

Unfortunately, the only opportunities for e-biking on the Hebgen Lake District are existing motorized roads and trails. Most of the District's motorized trails are technical, steep and rocky with limited site distance and shared with motorized vehicles traveling much faster than possible on an e-bike. Consequently, they do not provide safe and enjoyable cycling experiences for physically challenged and/or senior e-bike riders. In contrast, the Rendezvous trails are on rolling terrain, are wide, rock free, with excellent site distance and free of other motorized uses. These characteristics provide a safer experience for more vulnerable senior e-bikers. The Yellowstone Short Line Trail, in addition to being paved and located on flat or gentle grades, shares these desirable characteristics. Changing the status of these trails to "Open to class one e-bikes only" would provide new and safer opportunities for disabled and or senior e-bikers to enjoy their National Forest and address the needs of these currently underserved Americans. Not only are these opportunities scarce, the demand for such opportunities is rapidly growing. E-bike sales in the U.S. increased from 185,000 in 2013 to 790,000 in 2021 (electret). "The average e-bike rider tended to be older (average age 48.1 years of age) compared to regular cyclist (41.4 years of age). (Juiced Bikes). The older adult population in the U. S. increased from 15% or 49 million people in 2016 to 17% or 56 million people in 2020 and is projected to increase to 21% or 73.1 million people in 2030. (Census Bureau) Taken together, these trends demonstrate rapid growth in senior e-bike use and the clear need to provide more opportunities for these currently underserved Americans.

As defined by the new FSM 7705, a class one e-bike is "an e-bike with a motor that provides assistance only when the rider is peddling and that ceases to provide assistance when the e-bike reaches the speed of 20 miles per hour". Since seasonal bicycle use is currently allowed on the Rendezvous and Yellowstone Short Line trails, a key consideration in analyzing the effects of allowing e-bike use is the extent to which the effects from e-bike use are comparable to the effects from existing bicycle use. Since class one e-bikes do not have throttles, only respond to peddling, have no emissions and produce only minor noise, they are comparable to existing bicycle use. With regard to potential environmental impacts of class one e-bike use on the Rendezvous area's soil, watershed, vegetation, wildlife habitat and other forest resources, they would be similar to existing bicycle use.

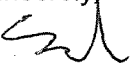
From our previous discussions on allowing e-bikes on the Rendezvous trails, I am aware of your concerns relative to the 2016 Greater Yellowstone Grizzly Bear Conservation Strategy that, as currently interpreted, an adoption of e-bike would change the trail status to motorized and thus would be additive to existing route limits. However, more recent developments in Federal land management policies with regard to e-bikes calls into question the relevance of the analysis employed the Conservation Strategy. In 2019, three years after the adaptations of the Conservation Strategy, The Secretary of the interior issued Order 3376, titled Increasing Recreational Opportunities through the use of e-bikes. This order directed all Department of the Interior (DOI) bureaus "to revise their regulations to define the term electric bicycle (i.e. class 1, 2 & 3) and to allow e-bikes where other bicycles are allowed. It also directed these bureaus "to develop proposed rules that would expressly exempt all e-bikes as defined "... from falling under the definition of off-road vehicle and/or "motor vehicle". In 2022, six years after the adoption of the Conservation Strategy, the Department Of Agriculture Issued Guidance to Manage Future E-Bike Use on National Forests and Grasslands. The most significant change from previous direction is that the FSM added a new category to identify the classes of motor vehicles on Motor Vehicle Use Maps. This category is for Trails Open to E-Bikes Only (with the class of the e-bike allowed specified)". These new authorities, while they differ slightly, provide authorized officers with the tools to allow e-bikes on trails where they were

previously excluded without allowing other motorized vehicles. DOI direction exempts e-bikes "from falling under the definition of motorized vehicle while, under the Forest Service direction, the classification of trails that allow e-bikes are still considered motorized but exclude all other motorized uses. The on the ground effects of these two rules are basically identical, i.e. they only allow e-bikes and still exclude other motorized uses. Given that this new direction post dates the 2016 Conservation Strategy, it is unlikely that the analysis used to develop the strategy included the effects of allowing e-bikes on trails already open to bicycle use while still excluding other motorized uses. Accordingly, it is incumbent upon the Forest Service to request that the Greater Yellowstone Grizzly Bear Coordinating Committee reconsider how e-bikes sharing trails with bicycles, and excluding other motorized uses, may affect grizzly bears and, consequently, how this may influence motorized route constraints. The process of evaluating of the environmental effects of the Proposed Rendezvous Trails MDP is an appropriate means to address this issue from a scientific, rather than a semantic, perspective.

In conclusion, modifying the proposed action by changing the status of Rendezvous Trails and the Yellowstone Short Line Trail to: Open To Class One E-Bikes Only, will result in providing significant public benefits with little to no financial cost or negative environmental effects. Increased safe and enjoyable opportunities for National Forest recreation will be provided to currently underserved disabled and/or elderly e-bike riders. And finally, analysis of the effects of class one e-bikes on grizzly bears and the constraints in the Conservation Strategy may be updated.

Thank you for considering my comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Ryberg', with a stylized, cursive-like flourish.

ED RYBERG