

Data Submitted (UTC 11): 6/5/2019 3:42:48 AM

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Comments: The Bitterroot Backcountry Cyclists is a chapter of the International Mountain Bike Association located in Hamilton, MT. While our 50 members are predominantly from the Bitterroot Valley they frequently travel to visit public lands throughout Montana including the Custer and Gallatin National Forests. Our members enjoy the slower paced adventurous riding found in places like the Lionhead. Rides where the goal isn't going fast or getting a workout, but rather to experience solitude, find a connection with nature, and experience the views of challenges of riding in alpine terrain. Much of Montana's alpine is already off limits to mountain bikes as designated wilderness, so those few remaining stretches where we can go above the trees and breathe the thin air are treasured.

Mountain biking comes in many styles from adrenaline fueled free riding and downhill to the more adventurous and solitary bike packing. Machine built trails, jumps, and unsustainably steep trails have no place in backcountry such as the Lionhead or Porcupine/Hyalite/Buffalo Horn WSA. Keeping these trails rudimentary and primitive will ensure slower speeds and a backcountry ethos.

The decade long partnership between horsemen and mountain bikers in the stewardship activities should be recognized as a successful story of collaboration between user groups that don't always see eye to eye. We encourage the Forest Service to maintain access to the Lionhead for mountain bikers while maintaining its wilderness qualities by managing it as a Backcountry Area.

The Gallatin Forest Partnership (GFP) has been a successful example of a collaborative effort to find reasonable balanced solutions to the management of the forest. We believe the GFP finds a reasonable middle ground between conservation and recreation.

In general we believe the fears of bikes having a discrepant impact on wildlife to be overstated. We accept that mountain bikers have an impact. The question is the impact greater than other quiet non motorized uses such as hiking, horse back riding, or hunting. In 2010, Parks Canada did a literature review of the ecological effects of mountain bikes. They do state, "There is support in the literature for the hypothesis that the effects on some species of wildlife are more pronounced with mountain bikes than they are with other forms of recreation (primarily related to the 'sudden encounter' effect), but again these effects are highly dependent on the species being considered and other factors." This startle factor appears to be attributed mostly to a study on Grizzly Bears on the Moraine Lake Highline Trail. A follow up to that report that management options including the requirement that mountain bikers travel in tight groups with a minimum of six people significantly reduced human-bear conflict. Parks Canada also concluded in the original study of the Moraine Lake Highline Trail that, "there is no ecological rationale that we are aware of for managing cyclists to lessen habitat disturbance without also managing other user groups and developments."

The death of a single mountain biker several years ago near Glacier National is frequently cited as the indicator that mountain bikes are a unique risk to bears and should be banned from backcountry and bear habitat. It must be noted that this unfortunate encounter did not occur far off in the wilderness but in a rural residential area on decommissioned Forest Service Roads. While this incident should give us pause, it is also important to note that during the 2018 hunting season in Wyoming and Montana, two hunters were killed, 5 were mauled and 4 bears died as a result of human-bear encounters. This spring 4 Grizzly bears were euthanized by Montana Fish, Wildlife, and Parks after becoming habituated to human food. Grizzlies are impacted by humans in many ways so singling out bikes seems hyperbolic. Whether it is using bear proof food storage when backpacking, carrying bear spray in the backcountry, or securing trash and food sources at our homes the goal is mitigation and management, not exclusion. For example, if bears are frequenting a trail or area, the area should be selectively

and temporarily closed to all users similar to closing climbing routes when raptors are nesting.