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First name: Evan

Last name: Sollberger

Organization:

Title:

Official Representative/Member Indicator:

Address1: 2292 Caminito Pajarito

Address2: Unit 92

City: San Diego

State: CA

Province/Region: CA

Zip/Postal Code: 92107

Country: United States

Email: ev13@hotmail.com

Phone:

Comments:

Dear Forest Service Plan Revision Team,

I am writing to provide comments on the Custer Gallatin National Forest plan revision. I live in California but visit Montana frequently to vacation. I hike and mountain bike, and some of my favorite areas for both activities are within the Custer Gallatin NF - in particular, the Bridger Mountains, the Gallatins, and the Lionhead. The entire area has fantastic recreational opportunities for all users and I love the fact that I can get out on the trails and get far enough out there that I don't see anyone else. Hiking does not seem to be impacted by this process so my main concern with the draft plan is that some alternatives will restrict mountain biking from some of the best remaining high elevation rides in the country.

The Lionhead is of greatest concern to me because multiple alternatives designate Recommended Wilderness (RW) such that the Mile Creek to Sheep Creek route and the Continental Divide Trail as a through-biking route will no longer be open to bikes. Mile Creek Trail as I understand it was designed and built with mountain biking in mind and is maintained by local bike groups along with other users. The numerous switchbacks were built at a perfect grade for riding bikes, unlike many hiking and stock trails-turned-multi-use which are steep. Being able to connect from Mile Creek all the way around to Sheep Creek is one of the most stunning, remote and challenging backcountry mountain bike rides left in the country. The CDT makes up part of that route but is a long-distance trail on its own. Blocking through-passage of the CDT for bikes will eliminate bikepacking opportunities and the ability to put together long-distance routes. This is a considerable loss considering the growing popularity of bikepacking.

I support Alternative E for the Lionhead because it applies a non-motorized backcountry designation to the Lionhead which would allow for continued use on Mile to Sheep and the CDT by bikes. My second preference would be Alternative C which appears to locate RW boundaries such that the CDT as well as Mile Creek, Watkins Creek Trails and Sheep Creek are excluded from RW. Applying a non-motorized backcountry designation provides a high level of protection, albeit not congressionally designated, without removing an entire user group from the landscape, thereby making this the best compromise.

The second area I am concerned with is the Gallatin range from Hyalite south to Buffalo Horn. I was fortunate enough to be able to mountain bike the Gallatin Crest trail before it was closed to bikes a number of years ago. This remains one of my favorite biking memories for the views, the solitude, and the challenge this route offered. It was heartbreaking to have it closed to bikes. Other rides and hikes in the area such as Emerald Lake, Blackmore are great too but they cannot make up for the loss of such a fantastic route on the Gallatin crest. The Gallatin Forest Partnership agreement is a good step to balancing all recreation and preservation, but the fact that the Gallatin Crest trail would fall within RW and thereby not allow bikes is something I cannot support. Therefore I ask the Forest Service to adopt Alternative E and designate non-motorized backcountry in the Hyalite-Buffer Buffalo Horn WSA. My second preference would be to adopt Alternative B or C, but modified so that the Gallatin Crest Trail is cherry-stemmed in a corridor designated non-motorized backcountry or simply with designated with bikes as an allowed use within RW.

The third area of concern is Line Creek Plateau in the Absaroka-Beartooths. The Line Creek Plateau trail follows this high ridgeline for many miles and is a very unique bike ride or hike. Each time I've been on this trail it has been difficult to follow due to lack of use, and I have seen no other users. Each alternative except for D

shows the plateau outside of RW. Alternative D is the only alternative I would object to here, which shows it entirely as RW. I would support Alternative A, B, C, or E in this area since all of those continue to allow bikes.

Bridger Mountains - as with Line Creek, the Bridger Mountains only show RW in Alternative D. The Bridger Foothill trail running along the crest of this range is another great mountain bike route. It is currently open to motorcycles as well. I support any of Alternatives A, B, C, or E for this area to keep bikes legal in the Bridger Mountains.

I have read several concerns with bikes in areas such as the Lionhead and Gallatins that I believe to be unfounded.

The first concern is that bikes will harm Grizzly bear populations due to their high speed of travel. I don't believe that concern is founded in backcountry areas such as these. The raw, primitive nature of backcountry trails which are found in the Lionhead and Gallatins is a natural limiter of speed, even on descents. In many years of riding backcountry trails my average speeds are usually around 2-3 miles per hours climbing, 10-12 miles per hour descending, and in between on gentler grades. My average speed on rides is consistently around 5 miles per hour. Narrow trail, loose surfaces, embedded rock, overgrowth by brush, downed trees, and off-camber surface all work to keep speeds down. I am a pretty average rider in terms of speed and skill. Even if a rider hits 15 miles per hour on a descent, it is possible to stop in a short distance in the event a bear, or more frequently in SoCal, a rattlesnake, is spotted. Yes we need to keep our eyes on the trail when riding but we are always looking ahead and often spot wildlife such as deer, rabbits, snakes, and other critters in our peripheral vision. When riding in grizzly country riders are definitely on the lookout for bears and come prepared riding with bear bells, bear spray, and making lots of noise. Hikers tend to travel at 2-3 miles per hour and trail runners 5-6 miles per hour, and I really don't see that as a significant difference from bikes. If speed is such a concern with grizzly bears, shouldn't trail running be eliminated as a use as well? Presence of all users will impact wildlife populations. There are far more hikers than there are mountain bikers. As with the question of speed, if recreational use is such a large impact on bear populations shouldn't all recreational use be halted? The plan alternatives do not deal with this in terms of land use designation - instead, it is either non-motorized backcountry or RW - bikes or no bikes. I hope the Forest Service will take a close look at usage statistics in making a decision. I am confident you will find that mountain bikes are not using the trails in these areas in sufficient numbers to have a significant effect on bear populations.

The other concern I hear is that mountain bikers are in conflict with other trail users. This can certainly be the case on busy front country trail systems, which in SW Montana would be trails like Emerald Lake that are easily accessible from Bozeman. But the majority of areas under consideration in this plan revision are not front-country trail systems. On backcountry trails like the CDT, Mile to Sheep Creek, Line Creek, and Gallatin Crest there are very few users of any type.

Not only are these trails far from major urban centers, there are other significant draws nearby like Yellowstone National Park that people head to instead, overlooking these lesser known trails. Furthermore, there is a substantial price to access these trails in the form of 3,000 to 4,000+ foot climbs over five to 10 miles to get to any peaks or viewpoints. These limit day-hiking opportunities except for the strongest hikers and backpackers, which also reduces traffic significantly. Mountain bikers can cover longer distances in a day but these significant climbs and the tough nature of the trails also limit the numbers of riders who are willing to take on these routes. I have never seen more than one other group in numerous days riding Mile to Sheep Creek. It is hard to have conflict between users when there are only a handful of people on the trails on a given day.

Further to that is that is the slow speed nature of backcountry trails and the fact that users of all types who recreate in backcountry areas like these tend to be experienced backcountry users who know and practice proper trail etiquette. There is occasionally a bad actor in any group, but this is nothing like you get in easy to access front-country trail systems. Conflict in backcountry areas in SW Montana is not something I have ever experienced in many years of recreating there.

Mountain bike groups have proven themselves to be valuable partners in maintaining backcountry trails, and are responsible users in the backcountry. Please adopt alternatives in this process that do not limit bike access.

Thank you for the opportunity to comment on this forest plan.
Sincerely,
Evan Sollberger
San Diego, CA