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Sent: Thursday, June 13, 2019 12:49 PM

To: comments-northern-flathead-tally-lake@fs.fed.us

Subject: Comments on issuing permits for Whitefish Trails Ultra-marathon and Foy's to Blacktail Trail Marathon and Whitefish Shuttle Guiding Service

Thank you for the opportunity to comment on these permit requests.

I oppose the USFS issuing special use permits for trail running events in grizzly and black bear bear habitat because by doing so the USFS is permitting activities that are known to increase the danger of human-bear conflict, human injury, and even human death. There is no safe way to run in bear habitat. There have been extensive efforts for many years by both state and federal agencies (including the USFS) to educate the public on ways to recreate safely in bear habitat. There are 5 basic recommendations for the public when hiking in bear habitat (included in the Board of Review Recommendations regarding the fatality of Mr. Brad Treat, see link below) that agencies have promoted for years:

- 1 Be Vigilant**– Being vigilant for bears and bear sign (tracks, scat, feeding sites) can reduce the chances of stumbling onto a bear at a close distance, thereby reducing the risk of bear attack. Be especially vigilant if hiking off-trail. Bears may be more likely to respond aggressively in off-trail areas where they don't expect to encounter people. However, bears frequently use maintained trails and encounters may occur anywhere. The BOR encourages hikers to remain vigilant while hiking in all bear country.
- 2 Carry Bear Spray**– Bear spray has proven to be effective at stopping aggressive bear behavior during surprise encounters when the person involved has time to deploy it. The public should be made aware of this fact and encouraged to carry bear spray and to be familiar with how to rapidly deploy it.

3 Make Noise– Making noise while hiking is an effective method of forewarning bears of your presence, thereby reducing the chances of surprise encounters and related attacks.

4 Don't Run– Running during an encounter can trigger a chase response in a bear. In addition, jogging in bear country increases the odds of surprise encounters at close distances and surprised bears are more likely to be aggressive.

5 Do not Hike Alone– Hiking in group sizes of 3 or more people or traveling by horseback is known to reduce the risks of bear attack. Larger groups are more intimidating to bears and more likely to have at least one member making noise or being vigilant, thereby reducing the risk of bear attack. Horses are more likely to smell, hear, or see a bear before a person does, reducing the likelihood of surprise encounters. Horses are also more intimidating to bears and if needed, unlike humans, are capable of outrunning and outmaneuvering bears.

Recommendation #4 is do not run in bear habitat.

For the USFS to issue a permit to allow and therefor promote what all state and Federal agencies have been telling the public not to do will negate years of public education efforts. Issuing such permits will send the public a very conflicting message about how to recreate in bear habitat and send a bad message about the veracity of agency advice about how to recreate safely where there are bears.

Regarding the permit for a Whitefish Shuttle Livery and Guiding Service, if the USFS decides to permit this activity, I recommend that the permittee be required to conduct this biking guide service in accordance with the recommendations for mountain bikers contained in the Board of Review Recommendations regarding the fatality of Mr. Brad Treat (see link below). Linking this permit to the recommendations for safe mountain biking in bear habitat will provide an opportunity for the permittee to inform and educate the public on the importance of riding slowly (and other ways for safe biking in bear habitat). These recommendations for mountain biking in bear habitat are:

1 We recommend that mountain bike-specific signs be placed at maintained system trailheads on public lands in bear habitat. These signs should carry the specific messages below aimed directly at mountain bikers, and would provide

information in addition to that deemed necessary for other kinds of trail users. Since it is not possible to post and maintain mountain bike-specific signs on every trail that might be used by mountain bikers, we also recommend the development of brochures and posters with these same messages about mountain biking in bear habitat. These brochures and posters should be distributed to all bike shops, sporting good stores that sell bikes, and bike rental shops, and should also be used in outreach presentations to recreational groups and clubs. This information should also be available on websites targeted to mountain biking groups.

2 Suggested messages for signs and educational materials aimed at mountain bikers:

- a **Be Vigilant**– Be alert for bears and bear sign (tracks, scat, feeding sites) where you ride. Do not ride in areas where you see fresh bear sign like scats and tracks. Avoid riding in areas where there are rich bear foods like huckleberries in late summer when bears are very likely to be present. Bears frequently use maintained trails and encounters may occur anywhere at any time of the day. The BOR encourages mountain bikers to remain vigilant while biking anywhere in bear country.
- b **Slow Down**- Encounters with bears are much more likely to occur when riding at high speed. Surprised bears are more likely to be defensive and to cause injury to bike riders. High-speed encounters can cause enhanced aggression in bears and may cause bears to chase you and possibly knock you off your bike. Riding at high speed can be especially dangerous where there is little sight distance ahead or to the sides of the trail where you can surprise a bear at close range. Areas with curves in the trail or thick vegetation require slow speeds and making noise as you ride to alert bears to your presence.
- c **Carry Bear Spray**– Bear spray is effective at stopping

aggressive bear behavior during surprise encounters when the person involved has time to deploy it. Carry bear spray on your person, not in your pack, and in a place you can reach it in a few seconds. Should you encounter a bear, bear spray is an essential deterrent to enhance your safety. Also, should there be an incident with a bear, riding partners can aid injured riders by deterring bears with spray and this may save their life.

- d **Make Noise**– Mountain biking is a quiet and fast activity that may cause you to get much too close to a bear before either you or the bear knows it, resulting in a surprise encounter and a defensive attack by a surprised bear. Surprised bears are more likely to be agitated, dangerous, and aggressive. Making noise while riding is an effective method of forewarning bears of your presence, thereby reducing the chances of surprise encounters and related attacks. You can make noise by riding with bells, other noisemakers, and/or shouting when in or approaching areas of thick cover or at blind corners in the trail. If you can't make noise and you are in bear habitat with limited sight distance along the trail, slow down and be alert.
- e **Do Not Ride Alone**– Single riders are much more likely to surprise a bear and be injured or killed if there is an attack. Riding in groups of 3 or more people can reduce the risks of bear attack. Larger groups are more likely to make more noise and are intimidating to bears should a bear be encountered. Also, if there is an incident with a surprised bear and there is injury to a rider, the other riders can help by deterring the bear with bear spray, going for help, and offering first aid to the victim until help arrives.
- f **Never Ride at Night or at Dusk or Dawn** – Riding at night or during early morning or before dark will greatly

increase your risk of encountering and surprising a bear. Bears tend to be more active at these times. Your ability to be vigilant and aware of your surroundings is greatly reduced when you cannot see bear sign or bears in low light or in darkness.

g **Don't think: "It won't happen to me"**. That kind of attitude is what can get you into serious trouble whether you are mountain biking or doing any other potentially dangerous activity. Be prepared and be safe. That way you can enjoy your activity and you and the bears will be safe.

h **Remember the bears live there and you are just a visitor**. Taking these precautions will help keep you safer and reduce the stress and disturbance to bears that live in these places where you choose to occasionally recreate.

In an effort to reduce trail conflicts between mountain bikers and bears, this Board of Review makes the following trail recommendations:

- 1 Before new trails are opened to mountain biking in bear habitat, particularly grizzly habitat, there should be careful evaluation of the safety and reasonableness of enhancing mountain bike access in these areas where bear density is high. These evaluations should include:
 - 2 Evaluation of the sight distance along trails due to vegetation density (i.e. does the trail traverse riparian zones with limited sight distance and high ambient noise levels from running water in streams), or dense vegetation due to early successional stage vegetation, or extremely curved trail segments (tortuosity) where surprise encounters are likely.
 - 3 Evaluation of the productivity of bear foods along trail routes (i.e. does the trail traverse productive huckleberry fields or avalanche chutes?).
 - 4 Evaluation of the application of seasonal closures of trails for mountain bikes during key seasons and the management

capacity of agencies to maintain and manage such seasonal closures should the trail be opened for mountain bike use.

I recommend that each trail used by this Shuttle Service be evaluated as per the four recommendations above and that the permit specifically allow permitted bike use only on trails that have passed this evaluation.

As per the Board of Review recommendations, I also assume that each trail on the Flathead National Forest accessed by this Shuttle Service (and other system trailheads used by mountain bikers) will have in place appropriate signs addressing safe mountain biking in bear habitat.

In summary, I recognize that agencies cannot tell the public they cannot run in bear habitat or tell the public that they cannot mountain bike (other than in Wilderness) at high speeds in bear habitat, but agencies can refuse to permit and thereby endorse such running and high-speed biking when doing so will contradict years of agency educational efforts to help the public recreate safely in bear habitat.

I am available to discuss this further if you would like and to assist in USFS bear management and public messaging efforts regarding bears.

Sincerely,
Chris Servheen
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Treat BOR recommendations:
http://igbconline.org/wp-content/uploads/2016/03/160629_BOR_Recomm_Treat_NCDE.pdf