

Date submitted (Mountain Standard Time): 9/7/2020 2:48:44 PM

First name: Kail

Last name: Marks

Organization:

Title:

Comments:

Greetings,

I am writing to voice my objection to the proposed Key Linkage Area restriction on cross-country bicycle travel. While I do not regularly make a practice of riding or pushing my mountain bike "cross-country" (without a trail), the lands within the KLA contain many non-system trails that I utilize frequently. Many of these trails were established decades, if not a full century ago, and for whatever reason, are not part of the USFS inventory. They remain as some of the only trails where I can still experience solitude on my bicycle, as the system trails in the Bozeman area have become vastly overcrowded with various trail users, including bicyclists. This has only gotten worse as us cyclists have continued to lose traditional access, i.e. -- the Gallatin Crest (a policy which, by the way, I'm still strongly opposed to).

It is unfair to discriminate against bicyclists in this manner, considering that we are still in the minority of users that utilize such areas. I can think of one trail, off the top of my head, where I can count on one hand the number of other cyclists I've seen in the last 10 years. The fact that myself and a handful of friends are riding this trail every so often yields a nearly immeasurable impact on the environment. In truth, many of these types of trails are primitive, and a majority of our time "riding them" involves pushing the bike. These are not modern, high-speed "flow trails" like the newer Leverich Canyon mountain bike trail (which I do enjoy, admittedly). These are backcountry excursions that are physically demanding, predominantly slow, yet beautiful and serene experiences. Riding/pushing bikes on these trails is hardly any different than the effects of someone walking the trails and/or riding horses on them. Further, I have seen no evidence that wildlife habitat is in any way diminished, having documented frequent sightings of elk, bears, moose, and others even in 2020 when trail use has been at an all-time high.

In my initial comment during the first period of the Forest Plan revision, I spoke against the restriction of bicycles due to a "Key Linkage Area" designation. To date, I still feel that the KLA idea is somewhat ludicrous, as the major barriers to large mammal migration are the city of Bozeman itself, sprawling housing developments, and especially Interstate 90. If these animals aren't migrating right now, I fail to see how banning the few cyclists who use these areas is going to make any measurable difference. The idea that cyclists are hindering large mammal occupancy and/or migration is rooted in prejudice and discriminatory in nature, rather than being based on facts and evidence. Why not ban all human travel in the area, considering that hikers still represent the vast majority of users in the area? Obviously, I wouldn't support such a measure, but why is that never on the table? Why is it always cyclists who must lose access?

To see that mountain bikers are proposed to lose even more access now, in the Draft Record of Decision document -- at this 11th hour -- upsets me deeply. The proposal is capricious in nature in that I don't recall seeing any mention of it in the original plan, when I had more time to craft a diligent comment. Additionally, had this position been clearly indicated in the initial Forest Plan Revision documentation, I think you would have seen even more cyclists writing in opposition. As it stands, those who didn't comment in the earlier phase are now not even eligible to comment! As I recall, in the original document, there was simply mention that "no new trail building" would occur in the KLAs. I have no problem with that. What I have a problem with is that now, suddenly, us cyclists are facing an unexpected loss, without any evidence or studies to support such discrimination. Frankly, this measure does not seem to adhere to the NEPA process.

I urge you to reconsider this policy and allow "cross country" travel on bikes in the KLA areas. Again, most riding occurs on old trails and roads, not truly cross country. I think it is fine to not allow any more trails to be built in the KLA areas, but I'm hopeful that some new trails will be allowed in the Custer Gallatin National Forest to offset all the miles we have lost. Please allow us continued access to these areas within the KLAs that we've enjoyed for decades. Thank you for your time. Sincerely,

Kail Marks