

10/9/2018

Dear Forest Service,

I reside in Lewistown, Montana and would like to share my concerns regarding the possible loss of mountain bike access in the Custer-Gallatin National Forest.

I moved to Montana in 2006 specifically to XC ski and mountain bike. During the last 10-15 years, I've seen many Montana trails closed to mountain biking, and none added. Cyclists have been banned from about one thousand miles of longtime favorite trails and are slated to be banned from even more due to recently implemented and currently proposed WSAs and RWAs in Montana. Are we expected to simply quit our beloved sport in such a case as Alternative D is selected?

The lay reader might be wondering what cyclists are doing wrong to be banned from so many wonderful backcountry areas. As far as this writer can tell, the reasons behind these RWA and WSA-related bans have little to do with any ecological malaise or other factual concerns, they are primarily political in nature. Special-Interest groups like the Montana Wilderness Association and the Wilderness Society have been wielding their considerable wealth and influence in attempt to ban virtually all backcountry cycling. This is unnecessary to say the least, there must be a way for quiet, human-powered hikers and cyclists to share at least *some* backcountry areas. Cyclists, equestrians, and hikers have been and can continue to peacefully coexist on the trails.

Mountain biking stands out as one of very few quiet, peaceful alternatives to the locally dominant outdoor activities of Hunting, Fishing and all Motorized variations. While I don't condemn Hunters, Fishermen or Motor enthusiasts, I'm interested primarily in quiet, peaceful recreation and those activities are not quiet or peaceful. I see many of the other comments almost ubiquitously referencing 'motorized and mechanized use' together, making no effort to respect the obvious differences between 'motorized' and 'mechanized' travel. Relegating cyclists to motorized areas fundamentally misunderstands cyclists as if we are not the quiet, human-powered, sustainably growing user group that we are and deserve to be recognized as.

To not recognize the inherent sustainability of backcountry cycling would reflect a baffling shortsightedness on the part of a long-ongoing institution such as the Forest Service. As far as the trails themselves are concerned, bike tires do no more surface damage than traditional methods of travel (hiker/horseback), they are a poor vector for

invasive plant species unlike equestrians and they don't defecate on the trail. When trails do incur any damage from human or natural causes, cyclists have demonstrated reliability in being among the first, the most fervent and most numerous volunteers on the scene. For these reasons, the Forest Service should be bending over backward to facilitate bicycle access and the resulting benefits to all user groups. If the goals of the Forest Service are to exclude large and growing segments of the public from public land, allow system trails to fall into disrepair and become reclaimed by nature, discourage broad support of Forest Service operations and policy, and foster wholesale civil disobedience in remote areas where existing regulations are already woefully underenforced, then banning growing, sustainable recreational activities like mountain biking may well accomplish those goals.

One could spend a lifetime hiking and horseback riding in the millions of acres of Bob Marshall, Absaroka-Beartooth, and other hiking/equestrian-only Wilderness areas currently designated in Montana. I'm glad there are hiking/equestrian-only areas and I look forward to backpacking throughout them when my limited vacation days allow, however other outdoor pursuits, including Motorized variations and especially Mountain Biking, have lost hundreds of miles of trail to RWA and WSA designations in recent years and the hemorrhage promises to continue according to current and recent Forest Planning in the HLCNF, Custer-Gallatin, and other forests in Montana. I wish to stress that for us '9 to 5' type professionals who cannot backpack through the backcountry during our two-day weekends, Bicycles allow us to see some backcountry during our too-short weekends. I wish to echo the chorus of cyclist comments in favor of Gallatin Forest Partnership, continued bicycle access in all areas where it is currently allowed including the Lionhead area and the Bridger Range. I'd like to see no more Recommended Wilderness or Wilderness Study areas, and I'd also like to see Recommended Wilderness and Wilderness Study Areas managed as semi-primitive and non-motorized.

If the Forest Service decides in the end to ban us cyclists from the areas we love to ride, the decision should be well backed up with some hard data, something more substantial than "the Wilderness groups wanted this, and they have lawyers and paid staff and dozens of copied/pasted comments favoring alternative D". I expect the Forest Service to be well-prepared to answer with concrete data such questions as the following if their bike-banning decisions are to be respected as objective and fair:

- In what ways have bicycles impacted trail surfaces to the point where they deserve to be banned from said trails? How many inches of trail erosion can be associated with bikes compared with horses or other favored user-groups?

- Provide a simplified list of the 'wilderness characteristics' that have been impacted by bikes to the point where they deserve to be banned, and in what ways and to what extent do bikes impact them relative to the favored user groups? Again, I would like to see some numeric data points on this. I know one of them is 'opportunity for solitude', so what mileage of which trails in areas being considered for bike bans have compromised opportunities for solitude due to presence of bikes? How many solitude-seeking Forest visitors were denied solitude due to bikes, in what ways did this occur and for how long? Can any visitor realistically expect 100% solitude on public land as if they literally own the place? Why can't some people pass each other on the trails, say 'hello' and move along without brooding about the benign encounter for the rest of the day, and later complaining about it to the area management?
- What are the expected economic impacts to counties and towns in proximity to areas where bike bans are happening? How many tourism dollars were gained or lost due to bikes being allowed vs. not allowed in all areas in question?
- In what ways and to what extent do bicycles affect wildlife that hiker/horseback use does not? How many deer/elk/bear are disrupted by cyclists that would not have been disrupted by a group of hikers with dogs or a pack string?
- Why are bicycles considered 'mechanized travel' whereas other human powered vehicles are not? Rafts have levers (oars), high-tech hiking boots are springs and ramps, climbing gear involves block and tackle, trekking poles are essentially mechanical linkages, I would expect a fair and unbiased public institution such as the Forest Service to clearly express its concrete reasoning as to why these machines have free reign but bicycles are blanket-banned in Wilderness and WSA/RWA areas that may or may not be ever be designated as Wilderness. Rifles are high-powered machines, fully allowed for hunting and killing in the Wilderness. How do you explain these allowances in light of widespread bike-banning?
- For more restrictions to be enforced, it follows that more enforcement resources will be needed. Are Forest Service budgets increasing to allow this? Will the Forest Service be hiring more Rangers? Will existing rangers be diverted from their current duties to kick bikes off trails that bikes have been accustomed to riding on for years or decades? What current duties will now be neglected so that Rangers can kick- out newly-banned bikes?
- Every time I've visited certain National Forest areas this year, I've encountered dirt bikes where they aren't allowed. One can hear them coming from kilometers away, where are the Rangers? It should be relatively easy to kick dirt bikes out of

restricted areas compared to silent mountain bikes, how can the Forest Service feel confident in its ability to enforce these challenging new restrictions when it can't even apprehend the louder and more brazen lawbreakers? I don't condone lawbreaking, but it appears to me that the Forest Service is setting itself up to be laughed off and disobeyed even more than it already is.

- What resources will be appropriated to fill the trail-maintenance void when cyclist-volunteers are turned away?

Some of my questions may seem overly provocative, so I wish to remind the reader that the cycling community is on defense here. Through this planning process, we stand to gain nothing and lose everything. We just want the bleeding to stop. Please be moderate in your decision-making. Rule with a light touch, and try not to fix what isn't broken.

Thanks for reading my comment.

-Matt Schmidt, Lewistown