

Data Submitted (UTC 11): 6/5/2019 12:00:46 AM

First name: Kail

Last name: Marks

Organization:

Title:

Comments: To begin, I wish to commend the Forest Service for embarking on this long, difficult, and staggeringly complex process of revising the forest plan to address the wishes of such a diverse and often conflicting set of stakeholders. I appreciate the work you do, and that you've been transparent and value the public comment process!

I am a 5th-generation Montanan, and have been through many of these phases, statewide, regarding how our forests and mountains are managed. I mention that because I feel that the history my family shares with Montana gives me a unique perspective on how these lands are managed. I must admit, I find myself increasingly at odds with the recommendations and beliefs held by many of my fellow Montanans, many of whom are newcomers whose history and knowledge of the region goes back less than a decade. Namely, I find that across the state, my rights to engage in activities for which I've been a participant for over 30 years are under a constant threat -- from radical environmental "protection" groups and ideologies that are seldom grounded in facts, but governed by emotions and an unwillingness to share. The sad fact is that I care deeply about preserving the wild character of Montana's lands, but due to inconsistent application of laws and misinterpretation of the intent of the Wilderness Act of 1964, I can't support any alternatives that lead to the creation of much more designated Wilderness in Montana. As a longtime mountain biker that loves riding in the remote backcountry, I would, in some cases, support adding more Wilderness to our wildlands -- but cannot -- as I don't agree that bikes degrade the wilderness character of our public lands. Currently, I focus my efforts on the Custer Gallatin National Forest revision plan.

To cut to the chase, I am a "die-hard" mountain biker. I am 41, and have been mountain biking since I was 8 years old, across the state, region, and continent. It is my belief that the founders of the Wilderness Act of 1964 - - had mountain bikes been around at the time of its adoption -- would have included mountain biking as a desired activity in lands managed as wilderness. Unfortunately, those on the extreme-end of the conservation movement have managed to convince decision-makers that MTBs should be regarded as the same as motorized vehicles, and they are largely managed as such. I believe that mountain bikers belong in some Wilderness areas, and that local land managers ought to have a say in how these areas are managed, rather than a simple turnkey, blanket ban on mechanized travel. Here is why I believe mountain biking is not in contradiction to the existence of pristine wilderness:

Let me describe a typical backcountry ride from a personal standpoint: Nearly every ride in the Bozeman area, for example, begins with a stout climb. The loudest sound generated from my activity is that of my lungs working hard to propel myself and my bike up the mountain. My average speed, while climbing, is around 6 to 10 mph, dependent on the grade, of course. On the steepest trails, I've been passed by trail runners on many occasions. After an hour or four of silent, entirely human-powered labor, I reach the top. I pause to marvel at the miraculous beauty that surrounds me. This is a wholesome, grounding, and therapeutic experience -- likely the same experience shared by other trail users of all varieties. It goes far beyond a simple need "to recreate." The narrative that anti-recreationalists paint of mountain bikers "flying down the trails" is literally ignorant of the fact that for the majority of the time we're in the mountains -- when looking at the percentage of time -- we're traveling at the same speed and/or slower than some people on foot. It is only on the descents that we are faster, but the amount of time spent descending is usually as little as 10% of our particular visit to the mountains.

You see, being in the mountains has always balanced me; calmed me, relieved my stress load. I check my equipment one last time and turn around to descend. Yes, I descend more quickly than I climb. But to descend quickly requires knowledge of your equipment, a tracker's ability to read current trail conditions, and a strong focus on an ever moving point as far down the trail as possible. If you happen to be coming up the same trail, it

is highly likely that I've seen you before you hear me coming, and I immediately begin slowing in a controlled manner. No skidding occurs. By the time we cross paths, I have either stopped moving completely or on wide trails I've moved aside far enough to pass comfortably at matching speeds. In the case of "blind" corners, I have also slowed down as if there were a person or animal just around the bend, for it is impossible to react to something unknown when traveling at high speeds. Furthermore, remote backcountry trails typically do not facilitate high-speed travel in the same way that frontcountry, more bike-specific trails do. The pitches tend to be steeper, the tread rougher, and less maintained.

Why do I choose to mountain bike? It is great exercise, and it allows me to access beautiful places away from the crowds. For the same reasons, I also enjoy hiking. However, as a recipient of surgeries in both knees, I cannot access the remote backcountry on foot -- pain stops me. Though I have spent much of my youth distance running, I have been told by doctors that I should permanently refrain from running as a form of exercise. To do so would ensure a future of full knee replacement in both legs. Riding bicycles allows me to reach those places I cherish without causing further pain and discomfort. I am fortunate to be able to do this, but I am aware there are many others in worse physical shape than I. Are we to deny them access to the same lands of which they share ownership?

In over three decades of mountain biking in Montana and all over North America -- thousands of rides by this point-- I can truthfully say that I can count the number of "close" encounters with animals on one hand. Whether they were bears, elk, deer, mountain goats, or moose, the outcome was always positive. Both of us went our separate ways and went on with our lives. No trauma occurred. In most cases, the animals went on grazing or otherwise foraging for food.

The imagery presented by those at the extreme end of the conservation movement is in stark contrast to what I and my fellow biking friends have actually experienced. Yes, accidents and unfortunate encounters can happen, particularly with bears. But those incidents are exceedingly rare, and they can happen to anyone, be they on bikes, horses, or their own two feet. It behooves us all to be prepared and aware of the dangers presented in the far reaches of the backcountry. No one wants to see animals harmed or habitat damaged. Further, the most likely scenario in which grizzly bear/human conflicts arise is in cases where people are cooking and/or storing food in the backcountry, or when a hunter has left downed game and comes back later to retrieve it. Some groups try to rationalize closing trails to bikes in the interest of avoiding grizzly/human conflicts, but statistically, those interactions are far more rare.

I don't want all of our land to myself as a "playground" as some put it (Besides, what is it that everyone else is doing in the outdoors if it isn't "playing?") I want to continue to experience the clean, quiet, low impact sport that I cherish. I have a clean conscience about my time and actions in the backcountry. I agree with the idea and value of wilderness. But when we are barred from our public lands simply because of the unfounded opinions and unscientifically grounded efforts of a vocal few whose real motivation is that they lack the ability to share, I fear we are treading further away from the principles this country was founded upon.

The Wilderness Act of 1964 was created to preserve the natural wonders of our nation. Yet, a motive that is more frequently being forgotten is that it also understood the value of human access to those lands. It aimed to get people into the wild for a rejuvenating experience. As Wilderness is currently managed, that goal has been placed aside in favor of exclusion. For that reason, I cannot endorse anything about Alternative D in the forest plan, for it locks us out of far too much of our wildlands. It alienates far too many people who would otherwise be stewards of the land.

Perhaps most ludicrous in Alternative D's heavy-handed restrictions is the inclusion of the entire west flank of the Bridger range as designated Wilderness, for reasons of habitat "connectivity." I feel that "connectivity" is a new buzzword that extremist conservation groups use to justify closing more and more areas to recreational uses. To say that the west side of the Bridgers is necessary as a "migratory corridor" is to ignore the fact that species must

first pass through the city of Bozeman -- as well as Interstate 90 -- on their way to that area. If these species are not already doing so, I find it supremely difficult to believe that closing off this very popular area to mechanized and motorized use will make any difference in their ability to traverse the area. Additionally, the Bridger range, though spanning over 25 miles north and south, is a rather narrow range from east to west. It is bordered by housing developments on both sides, a major ski area, and really doesn't hold a significant acreage nor conditions to be qualified as having "wilderness" character or potential. It should be designated as frontcountry with backcountry segments, and managed for recreational use. Animal populations are thriving there, even in the presence of mechanized and motorized use. Those on the other side of my perspective constantly make outlandish claims such as "thousands of species are at risk of extinction." This is laughable, and observably, categorically, and statistically false. I can point to vast areas in Montana where, not only are animals thriving, they are doing so not just in the absence of Wilderness designations, but in the presence of mechanized, motorized, and other recreational users.

Most often, such remarks are focused on bear habitat, and bears' supposed "inability" to coexist with bikes. To counter that, I admit that I am not a bear biologist, but I have observed both black bears and grizzly bears extensively in the wilds of Montana. To cite a specific locale, I have ridden the Leverich Canyon trail in Bozeman, on average, 75 times per year for the last 10 years or so. I've been riding that trail for the last 23 years, but have kept track closely for the last decade. I continually see bears there; on average 4-6 sightings per season, sometimes more. Though the popularity of that trail (primarily for mountain biking) has increased exponentially in my time, bear sightings have not diminished in the slightest. In every instance, my contact with bears has resulted in the bear(s) and I parting ways on good terms. In fact, there has only been one unfortunate instance in Montana, to my knowledge, that resulted in a mountain biker/bear altercation; near Glacier Park. In that instance, the rider was regrettably killed. However, to cite that example as a rationale to limit mountain bike access to our backcountry is to ignore the statistics completely. Far and away, as I mentioned earlier, the leading cause of negative interaction between bears and people, is when people exhibit unsafe food handling/storage in the backcountry. This includes leaving downed game in an area, to be retrieved later.

I can already hear the argument on the other side: "But those are bears that are accustomed to people. They're 'different' than backcountry bears." No, they're not. They are a highly adaptable, admirable genus of animals. I actually love them, and consider myself fortunate to get to see them so often on my bike. The "science" claiming that they can't coexist with mountain bikers is little more than an effort to ban bikes from more trails. Further, this ideology ignores the fact that grizzly bears are thriving in Yellowstone National Park, an area that sees upwards of 4 million visitors (most of which visit by automobile) each season. It is a hard sell to believe bears can handle that -- but not a few bikes on backcountry trails. As someone who visits our wildlands perhaps as often or more often than even wildlife biologists, I have not found evidence that bears and bikes can't coexist. Why else do I continue to see bears -- often? Why have they not vacated the areas where I and many others choose to ride our bikes?

Finally, grizzlies have expanded far beyond the borders of the Greater Yellowstone Ecosystem, with or without (W)ilderness "protection." They exist in the Gravellys, Centennials, Tobacco Roots, Elkhorns, Lincoln area, etc. Wilderness zealots don't want us to know that, but it's true. They are magnificent animals that don't need a "Wilderness" designation on paper to survive and thrive. I suspect their numbers will continue to increase. Currently, their numbers in the Greater Yellowstone Ecosystem are at capacity, another fact that Wilderness advocates conveniently ignore.

Moving onward, I am largely opposed to many of the provisions in Alternative C. Again, I am vehemently opposed to areas such as the Henry's Lake mountains (aka - "The Lionhead," Cowboy Heaven, and the Gallatin Crest being recommended as Wilderness. These are areas that have a history of mountain biking, and a history of stewardship by those users. They also exhibit a unique backcountry experience that is not present on front-country trails. I was around when it was legal to ride a bike on the Gallatin Crest, and cherished riding there before it became "managed as Wilderness" despite having no such Congressional endorsement. In my view,

this was a tragic loss of access without scientific justification, and I hope to one day see access restored. My dream is to ride my bike from Hyalite Peak south down the Gallatin Crest, and exit the mountains at the Porcupine drainage. This would not likely be more than a once-a-year adventure, as it would be extremely strenuous and time-consuming. I wouldn't expect to see a significant number of mountain bikers utilizing that route either.

My opponents argue that bikes lead to "too many people accessing the deep backcountry too quickly." Clearly, these folks have never ridden a bicycle to the flanks of Hyalite Peak, for example, only to continue further toward the Gallatin Crest. The cost of entry to such a ride is a brutal, grueling climb just to the beginning of the Gallatin Crest. A large portion of that "ride" involves pushing or carrying the bike. I say that from personal experience. There is nothing "quick" and "easy" about it. I submit again, this type of ride is not what your typical "weekend warrior" seeks, but rather, a once-a-year, planned-in-advance adventure.

I will concede, however, that the lands to the south of the Porcupine drainage are suitable for a Wilderness designation, and I would not be upset if that were the outcome. Having said that, in my more recent rides close to the borders of these areas, I seldom encounter anyone. These trails are largely not being frequently/heavily used by hikers, backpackers, or equestrians. Where is the user-conflict to justify excluding those of us that simply want a peaceful, quiet alpine bicycle ride in solitude? In my experience, most user-conflict occurs on frontcountry trails due to overcrowding. At most trails in the CGNF long enough to qualify, I seldom see any other users -- other than mountain bikers -- past 5 miles from the trailhead. We don't have a problem with each other.

Finally, when these areas become closed to mountain biking, it forces us to congregate in larger numbers on frontcountry trails that are already packed with other users, creating more potential for conflict. I, and many people I know, have already stopped riding bikes on trails near Bozeman that provided an amazing experience as little as 10 years ago. Due to rampant population growth, trails such as Sypes canyon no longer offer an experience I care for on a bike, or even on foot, for that matter. Truly, I do not want to cause other trail users to have an adverse experience. I typically choose trails for any given day based on how unlikely I am to encounter large numbers of other users of all types. My timing and trail selection intuition is usually pretty successful. This will become impossible with the additional restrictions proposed by Alternatives D and C. Is there a plan to build a multitude of frontcountry trails to offset this displacement? Where would the funding come from?

In closing, I am exhausted and disheartened at the prospect of continuing to lose the right to engage in quiet, ecologically-sustainable travel in my home state. On this very morning, in my local paper, I see that big names such as Bruce Babbitt, Interior Secretary under President Bill Clinton, and Yvon Chouinard, founder of Patagonia, are attempting to use their influence to secure more Wilderness in the CGNF. I hope your agency can see past this influence, as these folks very likely haven't spent any time here, don't understand the implications of doing so, and are not stakeholders of this particular corner of the world.

My opponents often argue that "It's only a small percentage of the total forest land." That might be true if one examines individual Forest sections such as the CGNF, but these groups are trying to increase Wilderness in virtually every part of Montana. I would also counter that argument with the fact that the trails themselves only represent a tiny fraction of the total acreage of lands set aside for wildlife. We (mountain bikers) are not asking that the entire region be opened up for riding.

Largely, most of us would be thrilled at the prospect of merely retaining our right to travel the trails that currently exist.

Wilderness advocates also argue "You can still access these lands on foot or by horseback." Again, accessing these lands by foot simply is not an option for everyone, due to medical conditions -- and there are many who are in far worse shape than I, who cannot even ride a bicycle. Furthermore, not everyone owns enough land to

support horses, nor has the funding to purchase the animals in the first place. Moreover, it is difficult to take Wilderness advocates seriously, as in all of their recommendations, they are willing to take away the rights of others, but never quite willing to put their money where their mouths are and stay off the land themselves. This is hypocrisy at its finest.

As I wrote in a recent letter to the Bozeman Daily Chronicle, I am leery of those who claim to "compromise" when they in fact don't have to give anything up. If we must continue to designate more and more vast acreages of land to the Wilderness standard in the name of ecosystem protection, why are hikers and especially equestrians allowed continued access? They cause just as much, or in the case of equestrians, more damage to the ecosystem. Consider also the recent study in the Beartooths that found overnight campers and backpackers have been contributing to a vastly increased presence of pollution due to fecal contamination of the waterways. This is typically not an impact that mountain bikers leave on the landscape, as we tend to get in and out of the mountains in a single day, leaving no trace. I say these things not in an attempt to get these other users banned -- but only to illustrate a point that if we're going to split hairs and blacklist certain groups, we ought to look at ALL user groups and apply these bans to ALL of them. Certainly, there is a better way.

One final point -- the forested regions of the CGNF are wildly out of their natural fire cycle due to human efforts to suppress fire for the last century. Beetle kill, vast overloading of multi-story fuels, and climate change are contributing to a ticking time-bomb. It is my belief that sensible timber harvest utilizing modern, ecologically-sustainable methods would be advantageous to both our wildlands, wildlife, air quality, and human economy. We are at a point in our forests that allowing fire to return them to their natural balance is well beyond our ability to control, and the result of a major wildfire, on a hot, dry year, could very well spell the end of most of the habitat in the CGNF. Surely, this is not a desired outcome. Designating more and more of this land and "protecting" it as Wilderness could actually result in the opposite, and quite possibly its obliteration. The blanket management features of designated Wilderness would prevent agencies from doing what's best and necessary to protect flora and fauna. We have been very lucky in the past decades; I'm not sure we want to continue to rely on luck.

Please, discard most or all of Alternative D. Eliminate most of the recommended Wilderness provisions in Alternative C, namely everything north of Big Sky, Cowboy Heaven, and the Henry's Lake/Lionhead region. Eliminate any provisions that designate portions of the Hyalite drainage, Mt. Blackmore/South Cottonwood/Wheeler Gulch drainages, Bozeman Creek/Bear Canyon drainages, Chestnut Mountain, or any area within the Bridgers as recommended Wilderness. These are all places that mountain bikers such as myself cherish, and have been doing so for decades. Again, these places offer a unique experience that is markedly different than frontcountry trails. A large portion, if not most of the Madison range is already designated as Wilderness. The remaining un-designated areas are on the fringe, and ought to be managed as backcountry. If Wilderness lines must be drawn in the Gallatins, please consider drawing those lines further to the south -- between the Porcupine drainage and Yellowstone National Park. We need not designate the majority of these mountains as Wilderness to maintain their wild, serene character; nor to secure their excellent habitat conditions. That goal is possible with less regulatory management.

Regarding the Crazy mountains, I would propose some recommended Wilderness in the core of the range, to maintain the character valued by its traditional inhabitants, the Apsáalooke/Crow people. I would hope that some access in the fringes of that range would be maintained for more diverse recreational activities such as mountain biking. Perhaps we can all win.

As an alternative to Wilderness, I propose that we protect most of the lands of the CGNF using backcountry designations and sensible management that is responsive to the needs of the real stakeholders of the region -- its permanent residents. Please don't cater to out-of-state radical groups, whose members and contributors are shrouded in secrecy and likely haven't set foot on the land they're desperately trying to control. I imagine that in the travel management phase, some of these areas will be limited to foot and equestrian travel. I can live with that, and would look forward to sitting down at the table and discussing management plans that support all

voices. Timeshare travel management, for example, is a compromise that has worked well in the past and would continue to work.

In closing, if I have spoken with an insulting tone, it was not my intention to direct that at your agency. I am very passionate about these issues. I have the same deep level of care about our wildlands and wildlife as anyone; I just disagree with many about how to accomplish the preservation of such. Again, I appreciate the hard work that you're doing. Thank you for your time.