Data Submitted (UTC 11): 11/17/2021 6:19:33 PM First name: Kyle Last name: Klain Organization: Santa Fe Fat Tire Society Title: President

Comments: We, the Santa Fe Fat Tire Society, represent over 300 mountain bikers in the Santa Fe area and have participated in the SFNF Forest Plan since public participation was opened. Our interest is mainly focused on two key objections regarding expanding Wilderness Areas as well as the CDT.

1) We're interested in the objections made by the NMWild and Wild Earth Guardians in regards to expansion of Wilderness Areas (which are inherently off limits for bicycles) in regards to the Recommended Wilderness Areas identified in the original planning. The objections provided to the RWA expansions by the other parties would simultaneously limit recreational opportunities for cyclists by adding them to the Wilderness inventory, without necessarily achieving their objectives. The Wilderness Designation does not provide substantive management changes that would increase carbon sequestering or other environmental benefits, other than limiting certain user groups, specifically mountain bikers. We share similar concerns about climate change and habitat loss, but object to the notion that Wilderness designation changes the inherent character or value of the land in these regards.

In addition, Santa Fe Fat Tire Society is a member of the Greater Santa Fe Fireshed Coalition and, as such, understands the need to mitigate risks to the Forest posed by wildfire and climate change. Increases to the RWA in the Forest Plan will greatly restrict the ability of the FS to treat those areas with science based solutions to minimize the effects of high intensity wildfires and climate change. As pointed out in their objection, lack of funding may mean that the FS is unable to actively manage those areas, resulting in the same outcome as an RWA. Furthermore, where appropriate, the plan gives the Forest Supervisor the ability to make no changes to the wilderness character of the lands. Any treatments of lands in the IRA will have to go through the NEPA process, which will allow the public, and objectors to the Forest Plan, an opportunity to influence the effects of the planned actions on a case by case basis.

2) Regarding Greg Warren's objection to ROS of the CDT and wanting to exclude mountain bikers; the language of the CDT planning framework: FSM 2353.44b(10) - Bicycle use may be allowed on the CDNST (16 U.S.C. 1246(c)), using the appropriate trail design standards, if the use is consistent with the applicable CDNST unit plan (FSM 2353.44b(2) and will not substantially interfere with the nature and purposes of the CDNST (FSM 2353.42). There already are substantial areas of the CDT in Wilderness areas that are currently off limits to cycling and to expand this to include all of the CDT regardless of trail design or primitive experience is a broad banning of a specific recreation group with no substantive support. Human powered and non-destructive means of travel should remain open to all user groups.