



**BACKCOUNTRY
HUNTERS & ANGLERS**
MONTANA

April 26, 2023

Lolo National Forest Supervisor's Office
Attn: Amanda Milburn - Lolo Plan Revision
24 Fort Missoula Rd
Missoula, MT 59804
SM.FS.LFNRevision@usda.gov

Dear Ms. Milburn;

Thank you for this opportunity to comment on the Draft WSR and Wilderness inventories for the Lolo National Forest Plan.

The Montana Chapter of Backcountry Hunters & Anglers (MT BHA) represents roughly 3,000 dues-paying members and thousands of supporters in Montana. MT BHA works to keep public lands and waters public, to defend and improve public access, and to ensure quality fish and wildlife habitat and fair-chase hunting and fishing opportunities can be found when we get there. We value quiet recreation, large landscape conservation, and wild lands and waters.

We have reviewed the Wild and Scenic River preliminary inventory and see that it identified 682 named rivers and streams covering 2,849 miles of waterways in the LNF Planning area. We look forward to following and participating in the subsequent steps 2 through 5 in the WSR process as we believe many of these segments are deserving of WSR designations.

We have also reviewed the wilderness preliminary inventory that resulted in 85 polygons that include 1,528,904 acres of wild lands potentially suitable for wilderness designations. We look



forward to participating in the evaluation, analysis, and recommendations from those acres in steps 2 through 4 of this process. MT BHA supports designation of the four wilderness areas previously proposed in the 1986 Lolo NF Plan:

- Great Burn (Ninemile RD, 90,391 acres),
- Bob Marshal addition (Seeley Lake RD 70,994 acres) to include recommendations included in the Blackfoot Clearwater Stewardship Act,
- Sliderock (Missoula RD/Rock Cr 58,926 acres),
- Selway Bitterroot (Lolo Cr addition Missoula RD 3,702 acres).

Generally, MT BHA does not support increased mechanized and/or motorized use in wildlands that currently prohibit non-mechanized and non-motorized use. We are concerned that technological advancements of motorized (electric, gas powered or other) vehicles will attempt to infiltrate users further and further into unroaded and untrammed wildlands which would adversely impact both the wildlife and the wildness of the areas in question. Specifically, MT BHA fully supports designation of the four wilderness areas listed above that were proposed in the 1986 Lolo NF Forest Plan and consistent non-motorized management in both the Lolo and Clearwater NFs portions of the Great Burn.

MT BHA is also concerned with and supportive of measures in the revised LNF Plan to mitigate the impacts of increased recreation pressure on wildlife and wildlife habitat.

With a broader view of the revised LNF Plan and the process that will follow, MT BHA offers the following feedback:

- We support how the 1986 LNF Plan included specific goals, standards, and guidelines rather than general objectives, and feels these are the most effective resource management tools found in the 1986 LNF Plan
- We request that the revised Forest Plans to include hard standards and guidelines like the ones found in the 1986 Plan



- We would like to see the revised LNF Plan be a forward-looking document that provides guidance for the progression of technology and associated impacts, and prepares for new and yet unknown technology encroachments
- We appreciate the Forest Service for their current classification and associated management of eBikes as motorized vehicles, which they are; eBikes represent the sort of technological advancements we hope the revised LNF can address
- We support and encourage the LNF coordination with adjacent forests and states (e.g. Idaho) and state agency lands (e.g. the MT FWP Fish Creek Plan)
- Where appropriate, we support removing temporary roads from the landscape and reclaiming and recontouring temporary roads
- With few exceptions, we oppose new trail construction into and through currently untrailed areas consisting of wildlife security habitat
- Generally, we support tree cutting projects designed to improve or maintain wildlife habitat; we prefer smaller thinning units interspersed with more security habitat cover between thinning units
- We encourage more prescribed burning that both improves wildlife habitat and accomplishes fuels reductions
- We fully support identification, protection, and maintenance of wildlife migration and movement corridors, along with critical big-game wintering grounds

We look forward to continuing to participate in the LNF Revision Process, and we thank you for the opportunity and for the consideration of our comments.

Sincerely,

Andy Kulla, MT BHA Committee Member

Scott Mylnechuk, MT BHA Missoula Valley Board Member

