BACKCOUNTRY HUNTERS & ANGLERS
MONTANA

March 25, 2024

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

Re: Lolo National Forest Plan Revision Comments from the Montana Chapter of Backcountry Hunters & Anglers

Dear Ms. Milburn;

Thank you for the opportunity to provide feedback on the Lolo National Forest Land Management Plan Revision, and for all the work that has gone into the plan revision process so far.

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.

Broadly, we support how the 1986 LNF Plan included clear, measurable, Management Area specific goals and standards. Conversely, the Proposed Action uses a confusing set of six Management Area Plan Components but not all the Management Areas include these Components. Furthermore, most of the Management Areas don't have any stated Goals or Objectives. The result of what we see in this Proposed Action makes it nearly impossible to determine what kind of management changes are being proposed and how they differ from current management. We hope that the future Proposed Action will include similarly effective and measurable goals, standards, and guidelines as the 1986 LNF Plan.

We have reviewed the Proposed Action and have the following comments and recommendations:

Proposed Action (PA) Pg 57 2.2.2 Sustainable Recreation and Scenery

Recreation Opportunities

Comment: Generally, MT BHA does not support increased mechanized and/or motorized use in wildlands that currently prohibit -mechanized and -motorized use. We are concerned that technological advancements of motorized (electric, gas-powered, or other) vehicles will infiltrate users further and further into unroaded and untrammeled wildlands which would adversely impact both the wildlife and the wildness of the areas in question and create safety concerns. We appreciate and would like to see the USFS continue to manage e-bikes as motorized vehicles and prohibit them from being used on trails open to mechanized use but closed to motorized use. Additionally, we'd prefer to see resources put into maintaining existing trails, for example, rather than creating new ones.

Recommendation: Add to Desired Condition: Unroaded and untrailed backcountry areas remain so and there will be no new road construction into backcountry and limited – if any – new trail construction.

Recommendation: Add to Goals: Backcountry areas are to be managed to keep their primitive and uncrowded character. Management activities should protect solitude and quiet recreation in backcountry areas of the Lolo NF.

Recommendation: Add to Objectives: Within backcountry areas, user-convenience developments should be avoided. Maintaining solitude and wild characteristics will be priority considerations before any new developments in backcountry areas are permitted.

Comment: Unfortunately, the presentation of proposed summer and winter ROS classifications in Appendix 1 Maps 01 Forest-wide Maps makes it difficult or impossible to compare the proposed ROS categories to current ROS categories and determine specific proposed changes from the current condition. Additionally, the references to needing to change ROS categories from the present condition in the Need for Change document repeatedly say they need to change because of "changing use patterns." This is too vague to understand what specific changes are proposed, where, and specifically what the specific "changing use pattern" means on a specific geographic unit.

Recommendation: Present proposed ROS designations in a clear manner that we can both comprehend and compare them to the current conditions.

Recommendation: In the Need for Change document, clearly state what the "changing use pattern" is wherever it says there is a need to change or establish the desired ROS settings.

PA Pg 71 Hunting, Trapping, Fishing, and Wildlife Viewing (FWL)

Desired Conditions (FW-FWL-DC)

Recommended Desired Condition 03: There are vast and undeveloped backcountry and recommended, and designated Wilderness areas where hunters and anglers can pursue their passions in a primitive setting where self-sufficiency and self-reliance can be learned.

PA Pg 76 2.2.5 Eligible Wild & Scenic Rivers (WSR)

Comment: MT BHA supports the status of the Eligible wild and scenic rivers in the Lolo National Forest displayed in Table 14

Desired Conditions (FW-WSR-DC)

Recommendation: Add DC 03: “Eligible rivers support a healthy population of native and non-native sport fish for the angling public.”

PA Pg 80 2.2.6 Designated Areas

Comment: Table 16: MT BHA supports the expansion of the Carlton Ridge Research Natural Area.

PA Pg 84 Inventoried Roadless Areas (IRA)

Comment: MT BHA supports the Inventoried roadless areas in the LNF (NFS acres) in Table 17.

PA Pg 91 2.2.7 Other Integrated Multiple Uses Lands Ownership, Status, and Uses (LAND)

Recommendation: Add Desired Condition 12: “NFS lands are retained and expanded where feasible, and available, and the LNF prioritizes acquisitions that increase or improve public access. The LNF does not dispose of publicly accessible NFS lands or NFS lands that would reduce public access.

PA Pg 92 Add to Standards: Road and trail right-of-way development and acquisition will prioritize routes that will provide public access to currently inaccessible (ie landlocked) NFS lands.

PA Pg 94: Acquired Land Restoration Emphasis Areas (ALR)

Desired Condition

Recommendation: Add to Desired Condition: The management of the acquired lands listed in Table 20 will emphasize obtaining and maintaining public access and restoring and maintaining habitat for big game and healthy fisheries.

PA Pg 94 Objectives (FW-ALR-OBJ)

01 Every decade, decommission 10 miles of legacy routes to improve watershed conditions where the legacy road system exceeds the identified minimum transportation system needed to meet the desired conditions of the area.

02 Every decade, maintain or improve 10 miles of roads to provide necessary access.

Comment: The LNF lists 184,447 acres of acquired land with restoration emphasis in Table 20. Decommissioning and maintaining or improving only ONE mile / year (10 miles /decade) out of 184,447 acres seems unambitious. What is the basis of the objective to only restore one mile / year over 184,447 acres?

Recommendation: Add to Table 20 how many miles of roads are on these 184,447 acres of identified land with restoration emphasis.

Recommendation: Edit Objectives 01 and 02 above to from 10 miles / decade to at least 30 miles / decade which would still be only 3 miles / year. Make the same change with Objectives 01 and 02 on page 94.

PA Pg 98 Objective 05 Annually maintain at least 50 miles of NFS trails including a variety of wilderness/non-wilderness trails and motorized/non-motorized trails.

Comment: Fifty miles is only 10 miles per Ranger District per year. This seems low when there are thousands of miles of NFS trails to be maintained within the LNF.

Recommendation: State how many miles of NFS trails there are on the LNF.

Recommendation: Edit Objective 05 to read “Annually maintain at least 50 miles of NFS trails on each Ranger District on the LNF.” (or 250 miles a year across the LNF)

PA Pg 99 Guidelines

Comment: Guideline 05 reads: “Road and trail construction or reconstruction should use new technologies to enhance functionality, improve efficiency, reduce resource impacts, and reduce costs.” What are examples of trail construction or reconstruction technologies to enhance functionality, improve efficiency, reduce resource impacts, and reduce costs? This Guideline is currently unclear.

PA Pg 100 GRAZING

Desired Conditions (FW-GRAZ-DC)

Comment: There is currently no grazing permitted in the Rattlesnake National Recreation Area (RNRA) and the MA 3 lands. These lands are steep, thickly forested,

and are unsuitable for grazing. Domestic livestock grazing on these lands could degrade wildlife habitat and fisheries health and increase the risk for the spread of noxious weeds and invasive species.

Recommendation: Add Desired Condition to read “The entire RNRA is closed to domestic livestock grazing.” The PA currently says (Table A2.3) that grazing is allowed in the MA 3 portion of the RNRA.

PA Pg 102 V Objectives (FW-GRAZ-OBJ) 01

Comment: Restoration of only 0.1 to 0.3 miles of aquatic or riparian ecosystems every five years is only 105 feet to 316 feet annually. This seems like a modest objective.

Recommendation: Increase stream restoration goals to .5 miles annually with a focus on riparian ecosystems damaged by domestic grazing and/or to improve fisheries health.

PA Pg 155 4.2 MA 2: Recommended Wilderness (MA2)

Comment: MT BHA supports the recommended wilderness in Table 71

Comment: MT BHA supports recommended wilderness and backcountry because they maintain the quiet recreation opportunities our members seek.

Recommendation: MT BHA recommends that the 3,702-acre Selway Bitterroot Addition in Table 71 be expanded to run right up to and around the expanded Carlton Ridge Research Natural Area. This area provides contiguous wildlife connectivity between the Bitterroot National Forest and other important landscapes to the north. Adjacent to the recommended wilderness parcel is one of the Lolo’s six Research Natural Areas (RNAs), Carlton Ridge RNA. Since 1987, the RNA has protected 920 acres within the unique subalpine forests - including the threatened whitebark pine - on this ridge.

Comment: While the proposed action would retain the 1986 recommended Wilderness additions to the Bob Marshall and Scapegoat Wilderness Areas, it stops short of offering the same level of protection for the West Fork Clearwater area, adjacent to the Mission Mountains Wilderness. It would make this a “backcountry area,” prohibiting motorized use but still allowing mountain biking.

Comment: MT BHA asks that Proposed Action mirrors all of the pieces of the Blackfoot Clearwater Stewardship Act in the LNF Plan’s designations and recreation suitability components, including recommending Wilderness for the Westfork Clearwater."

PA Pg 157 MA3 Backcountry & Pg 158 MA 4 General Forest & Pg 159 MA5 Concentrated Recreation Areas

Comment: The RNRA provides outstanding backcountry hunting and fishing opportunities; these primitive recreation values were recognized by the Rattlesnake Act of 1980. The habitat and character conditions in the RNRA have been maintained in the 1986 LNF Plan and its Amendments as one unique MA. Dividing the RNRA into three fewer protective and more development friendly MA's (MAs 3, 4, and 5) will degrade the RNRA's primitive and undeveloped character, setting, experience while diminishing quality fish and wildlife habitat.

Recommendation: The RNRA should be assigned its own MA not only to maintain its undeveloped and primitive recreation opportunities and for the protection of fish and wildlife habitat, but also for its unique character and history. It is only one of two Congressionally designated areas on the LNF, the other being Wilderness, which has its own MA. It is also the only NRA in the Forest Service Northern Region. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and the PA should clearly state that the RNRA is closed to commercial tree removal, new road construction, and construction of temporary roads, and will be managed in perpetuity to protect primitive recreation and fish and wildlife habitat, as was the intent of Congress in the 1980 Rattlesnake Act. Fuels and vegetation manipulation should be conducted with non-mechanized and non-commercial methods with prescribed fire being prioritized, as has been done in the past and as was recently demonstrated as effective and well accepted in the 2015 Marshall Woods Project. The RNRA should be managed with preservation and enhancement of the wildlife habitat and quiet, primitive recreation (and associated backcountry fishing and hunting opportunities) as high values as stated in the Rattlesnake Act of 1980.

PA Appendix 2 Suitability Summary

Pg. A2-3

Recommendation: MT BHA recognizes the threat that noxious and invasive species pose to healthy fish and wildlife habitat. MT BHA is concerned about development of roads and trails, cattle grazing, and recreational developments because they've all been shown to spread noxious and invasive weeds.

Appendix A / January 2024 Preliminary Issues sheet

Issue 2, third bullet statement: "Opportunities (suitability) for mountain bikes or ebikes and other uses"

Comment: 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 untrammeled wildlands which would adversely impact both the wildlife and the wildness

of the areas in question and create safety concerns. We appreciate and would like to see the USFS continue to manage e-bikes as motorized vehicles and prohibit them from being used on trails open to mechanized use but closed to motorized use.

Closing Comments

· MT BHA requests that the revised Forest Plan include clear, measurable, and accountable Management Area specific goals and standards like the ones found in the 1986 Plan.

· Montana BHA supports the Blackfoot Clearwater Stewardship Act and would like to see all the plan components of the collaboratively created agreement reflected in the Forest plan's analysis.

· Where appropriate, MT BHA supports removing temporary roads from the landscape and reclaiming and recontouring temporary roads.

· With few exceptions, MT BHA opposes new trail construction into and through currently untrailed areas consisting of wildlife security habitat.

· MT BHA generally supports tree cutting / thinning projects designed to improve or maintain wildlife habitat except in areas designated by Congress for other high-resource values (such as Wilderness); on a landscape scale, MT BHA prefers smaller thinning units interspersed with more security habitat cover between thinning units.

· MT BHA encourages more prescribed burning that both improves wildlife habitat and accomplishes fuels reductions.

· MT BHA fully supports identification, protection, and maintenance of wildlife migration and movement corridors, along with critical big-game wintering grounds.

· MT BHA encourages the US Forest Service to continue to designate the Hoodoo recommended Wilderness using the same boundaries as the last four decades.

· MT BHA would like to see the Cube Iron-Silcox area managed as recommended Wilderness to protect this area's wild character, habitat, and quiet recreation opportunities.

· MT BHA strongly supports improving public access when evaluating lands for acquisition.

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

Sincerely,

Andy Kulla, MT BHA Volunteer Committee Member - Florence, MT
Dan Tracey, MT BHA Volunteer Missoula Valley Board Member - Corvallis, MT