



Amanda Milburn, Lolo Plan Revision Team Leader  
Lolo National Forest  
24 Fort Missoula Road  
Missoula, Montana 59804

March 29, 2024

Re: Lolo National Forest Land Management Plan Proposed Action

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>.

Dear Forest Plan Revision Team,

Please accept these comments on behalf of Montana Trail Crew and Run Wild Missoula. Run Wild Missoula is a Missoula-based non-profit organization with over 2,000 members who reside within the Lolo National Forest landscape. The mission of our organization is to promote and support running and walking for people of all ages, abilities, and backgrounds. Montana Trail Crew became a part of Run Wild Missoula in January 2017 and engages our members who run on trails. Montana Trail Crew is devoted to strengthening the Montana trail running community and advocating for the open space and wild lands where we run. We do so by engaging our members and other volunteers in trail stewardship projects, educating our members about public lands advocacy and engagement opportunities, and hosting formal and informal runs that take place on public lands.

At present, Run Wild Missoula is permitted to host three races on Lolo National Forest lands, the Pengelly Double Dip, Mount Jumbo Elk Ramble 15k, and the City to Sky 50k. 2024 will mark the 21st running of the Pengelly Double Dip, 10<sup>th</sup> edition of the Mount Jumbo Elk Ramble, and will be the second annual City to Sky 50k. We appreciate the opportunities these races to allow us to serve our membership base that enjoys trail running, as well as the opportunity these events provide to introduce both local and visiting runners to the beauty of the Lolo National Forest. Run Wild Missoula looks forward to continuing to partner with the Lolo to host all three.

In addition, our free, educational trail classes utilize Missoula-adjacent Lolo National Forest trails in the Rattlesnake National Recreation Area, Blue Mountain, Pattee Canyon and Mountain Sentinel, and beyond. These classes introduce dozens of Missoulians each season to the quality, variety, and exceptional runnability of our trail system. Our classes have strict capacity limits to ensure that we are always in compliance with group size restrictions in the Lolo recreation areas where we run.

We also appreciate this opportunity to engage in the Lolo forest planning process in crafting the plan that will set the direction for the Lolo National Forest for decades to come. Our comments represent the values and needs of our members, as well as our organization.

## **Concentrated Use Areas Adjacent to Missoula**

### *Missoula-area infrastructure assessment and planning*

The areas depicted in the Proposed Action as Concentrated Use Areas are critical to our organization, membership, and the Missoula running community at large. As indicated above, these areas provide opportunities for us to host educational programming for our membership and the greater Missoula community. Our concentrated use areas are well-maintained and provide an extremely high-quality variety of opportunities for trail running. Since the pandemic, these concentrated use areas have seen use increase significantly as the Missoula population grows and as our community members increasingly seek the benefits of outdoor recreation.

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A lot of the Lolo National Forest infrastructure in place has weathered this increased use moderately well until now, but during the life of this new forest plan this infrastructure will be challenged by our growing population and demand. This includes parking, toilets, system connectivity, and trail density.

Run Wild Missoula and Missoula Trail Crew encourage the Lolo National Forest to use this forest planning process as an opportunity to create plans to do a holistic assessment of existing infrastructure across the Lolo-managed Missoula-area concentrated use areas. It is important that the Lolo develop a plan that addresses use patterns, user needs, and infrastructure not on an area-by-area basis, but across our Greater Missoula Area as a whole. This landscape-level approach to planning will ensure we don't put band aids on areas one-by-one, but that we plan and scale our access infrastructure in a way that creates a functional trail system for our community.

For example, solutions should not be developed for the known parking issues at the Sawmill Gulch trailhead in the Rattlesnake Recreation Area without also looking across accessibility and parking issues and opportunities at the main Rattlesnake, Woods Gulch, Ravine, and Lincoln Woods trailheads as well, in addition to ways to address times of heaviest pulses of use, etc.

There is also a significant opportunity at present to interact and coordinate with another Missoula-area planning process. The City of Missoula is currently developing a Parks, Recreation, Open Space, and Trails Plan (PROST) that will guide the city's management of parks, recreation, open space, and trails planning for the next 10-15 years. As such, it may be appropriate to engage with the City of Missoula as a coordinating agency.

#### *Opportunities to engage volunteers in stewardship*

Montana Trail Crew's ability to scale our volunteer stewardship opportunities has been limited by our inability to establish volunteer service agreements with the Missoula Ranger District. We have been encouraged to partner with other non-profits in our area who have existing volunteer agreements. We have followed through with this and frequently partner with MTB Missoula and other groups to get our volunteers out on trails, but we would like to see increased opportunities for groups such as Run Wild Missoula and Montana Trail Crew to directly engage with the Forest Service's Missoula Ranger District to contribute to maintaining the health of the Lolo National Forest trail system.

#### *Opportunities to host events*

As indicated above, Run Wild Missoula holds permits with the Lolo National Forest to operate three races/events each year. These events represent the only trail racing opportunities we provide to our member community, and therefore are very important to us in achieving our mission of promoting and supporting running and walking for all members of our community, including those who prefer running and walking on non-paved surfaces.

Our newest race, the City to Sky 50k, requires us to permit with five jurisdictions: Lolo National Forest, University of Montana, Five Valleys Land Trust (as the administrator of the Mount Dean Stone Community Forest), Missoula City Conservation Lands, and Montana DNRC. For 2023, the most restrictive permit we obtained was with the Lolo, and it limited us to 100 participants and included language that would prevent us from holding the race if "wet weather impacted trail conditions". The combination of permits we received required us to allocate \$45, or 38%, of each participant registration fee to permit costs.

We decided to go ahead with the race to fulfill what we saw as a community need and desire, even though we were likely to lose money given the participant number restrictions and cumulative permit costs, as well as the risk that weather could require cancellation. Thankfully, several Missoula-area businesses came forward to offer generous sponsorships and we were able to obtain a local grant, which allowed us to operate a race that barely came out in the black in the end. As a non-profit organization, highly

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restrictive permitting such as this may, in the future, prevent opportunities such as City to Sky from coming to fruition. It also forces us to charge more to participate, which complicates our ability to meet our mission to keep this race available to people of all backgrounds.

For another of our races, the Elk Ramble, our permit costs amount to 50% of the participant race fee, so this is not a challenge that is unique to the City to Sky 50k.

It is unclear to us whether this forest planning process is an opportunity to encourage management standards that will better allow organized events to take place on Missoula-area concentrated use areas in the Lolo National Forest in an appropriate and sustainable way. We'd also like to understand if Forest Planning will adjust any permitting practices for the concentrated use areas. If Forest Planning will engage in either of these realms, we would like to better understand how our experiences can be taken into account when developing the Draft Forest Plan and Environmental Impact Statement alternatives.

#### *Rattlesnake National Recreation Area*

The Rattlesnake National Recreation Area is a very special resource for our Missoula community. We appreciate the value of opportunities this recreation area provides, and we enjoy sharing the trails in the Rattlesnake with horseback riders, mountain bikers, skiers, dog walkers, and more. At present, the Rattlesnake National Recreation Area does not allow for e-bike use. As runners, we appreciate the opportunity to run the flowing, sometimes steep, trails throughout the Rattlesnake National Recreation Area without the potential for encountering motorized bikes, i.e. e-bikes. There may be some areas/trails within this National Recreation Area that can sustainably and safely allow for e-bike use, but we would like to see the new Forest Plan continue to allow only non-motorized use of the singletrack trails throughout the Rattlesnake.

#### *Connectivity within our system*

One of the strengths of our in-town and town-adjacent trails is the connectivity between areas. This is a result of conscientious and cross-jurisdictional planning and action. At present, Run Wild Missoula is contributing to efforts to maximize the utility, accessibility, and quality of trails available at the soon to be county-operated Marshall Mountain area. Our running community has indicated that one of the challenges of utilizing the existing trail system at Marshall Mountain is the lack of connectivity with existing trails, namely the nearby Rattlesnake Recreation Area trails. Some user developed trails currently connect the Woods Gulch area trails with Marshall Mountain, and there is potential for connections between the Sheep Mountain trails and the higher elevation trails present at Marshall Mountain. Intentionally developed connections between nearby Lolo National Forest trails and the Marshall Mountain system would ensure that trails are created in an erosion-resistant, sustainable way, and we encourage your coordination with Missoula County and Marshall Mountain staff to explore the opportunity to create new trail connections.

Run Wild Missoula's membership is also interested in the creation of better connections between the extensive Pattee Canyon trail system and the new trails on Mount Dean Stone. As with Marshall Mountain, user created, informal trails exist, but these connections should be created intentionally and sustainably.

## **Maintaining wild trails across the Lolo National Forest**

When Montana Trail Crew's founders introduced our mission to the world in 2014, they emphasized the intrinsic connection between mountain running and Wilderness. The values of Wilderness contain many parallels to the freedom of running and being a runner. As such, there are trails across the Lolo National Forest system that we know our members choose to run precisely for their wildness that are not yet designated as Wilderness, but that our organization would like to see continue to be managed to maintain



the potential for future Wilderness designation. We highlight those below and encourage the Lolo National Forest to manage these trails and the areas surrounding them as recommended wilderness:

- Stateline Trail through the Hoodoo Roadless Area, Meadow Creek-Upper North Fork Roadless Area, Sheep Mountain-Stateline Roadless Area, Ward Eagle Roadless Area in the Ninemile and Superior Ranger Districts
- Trails radiating out from Clearwater Crossing into the Hoodoo Roadless Area on the Ninemile Ranger District
- Four Lakes Loop in the Cube Iron Roadless Area on the Plains-Thompson Falls District
- Reservation Divide Trail in the Reservation Divide Roadless Area on the Ninemile Ranger District
- North Fork Blackfoot/Hobnail Tom Trail in the Bear-Marshall-Scapegoat-Swan Roadless Area on the Seeley Lake Ranger District

Other trails across our system are well-suited to be utilized by both human-powered and mechanized users. These trails maintain a moderate level of solitude and often provide more accessible opportunities for our trail running community. We request that these trails and surrounding areas be managed through the Forest Plan to allow for non-motorized use only:

#### Missoula Ranger District

- Rattlesnake National Recreation Area singletrack trails
- Portions of the Blue Mountain Recreation Area that are currently non-motorized
- Pattee Canyon and Mount Dean Stone system trails
- Lolo Peak Trail #1311

#### Seeley Lake Ranger District

- Morrell Falls National Recreation Trail #30
- Pyramid Pass trail #416 from trailhead to Bob Marshall Wilderness boundary
- McCabe Creek Trail #1404
- Clearwater Lake Loop #18
- Crescent Lake Trail #390
- Rice Ridge #429
- Dinah Lake #12
- Gus (Big Larch Tree) #490

#### Superior Ranger District

- St. Regis River Trail #223

We appreciate the opportunity to provide this feedback on the Lolo Forest Plan Proposed Action and look forward to continuing to engage with the Forest Service throughout this revision process. Please do not hesitate to reach out to us at any point.

Sincerely,

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