

April 1, 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

Dear Ms. Milburn;

Please refer to my 3/30/24 comments (Letter ID 62960-5662-936) on treatment of the the Rattlesnake National Recreation Area in your January 2024 Proposed Action for the revised Lolo National Forest Plan. That letter describes my experience and familiarity with both the management and on the ground primitive undeveloped recreation resource in the snake.

The Spirit of the Snake

My previous comments dealt with the regulatory environment in the Proposed Action (PA) and how that regulatory environment would adversely affect the on the ground primitive recreation resource in the Rattlesnake National Recreation Area (RNRA). I submit the below comments to address a "resource" that is completely ignored and missed in the PA for the RNRA, that resource being **the human spirit, the culture of the RNRA and the rejuvenating power of the snake.**

Forest Service planning and management is all based and wrapped around rules, regulations, laws, policy and a myriad of other technical management concepts and documents. Most wildland and FS service management is resource based. To the FS a geographic area consists of tangible physical resources or components, soil, wildlife, vegetation, water, etc. But the collection of those individual pieces and the effect of the combined pieces on the human soul and spirit are disregarded in contemporary white European management like the 2012 Planning Rule. The closest we come to it is what is called "solitude". Even in Wilderness, the effect on the human soul and spirit are missing in regulatory environment. In wilderness the language is all about what is NOT there, "untrammelled by man" rather than the spirit of recovery, nature and their effect on human soul and spirit.

The (RNRA) is completely unique in Forest Service Region One, which includes the entire state of Montana and beyond. The designation and natural recovery of the RNRA represents the only place in the Region where a piece of land had been heavily impacted by the acts of man to the point of ecological disfunction and where people had the collective will to stop the damage and let nature dominate and heal itself. It wasn't healed by heavy handed man management; the recovery has been through natural processes with only small and subordinate "management acts" by human "managers".

The history of how and why this happened is completely ignored by the PA. I don't believe this is intentional, but rather because the rapid rotation of FS managers finally grew so frequent that the culture and oral history of the RNRA got lost. The Lolo has completely lost its institutional and management memory and worse yet, any interest in it. Their repeated refusal to even listen to it when it's been offered strongly bears it out. During the fight for designation and after the Rattlesnake Act of 1980 the Lolo consisted of long tenured staff who over time developed not only an intimate relationship with the land but a deep personal familiarity with the on the ground resources, their history and **the**

culture of the forest and those who lived, worked and played on it. Past management history and culture was passed down by oral tradition, similar to how the history of our Tribal neighbors to the north, the Consolidated Salish Kootenai Tribes, do with their history. The cultural importance and related management do's and don't were passed from forest supervisor to forest supervisor, ranger to ranger, on the ground resource manager to on the ground resource manager. The written management goals and objectives were a framework but the nuts and bolts of successful nature-based management that considered the culture of each drainage or area was passed down or learned by long term managers and relationships with those who had lived with this land for a long time. That oral and management history enabled new managers to learn how to "thread the needle" in a very watchful and environmentally attentive public without getting mired down in controversy through sheer ignorance or inattention to management history. It is said that if we don't know our history, we are doomed to repeat the mistakes of the past. That applied in spades to land management in the Missoula area.

When I first saw the RNRA it was from the saddle of a motorcycle just before the RNRA was closed to motorized use. I'd heard all this hullabaloo about "The Rattlesnake" this and that like it was something special and got curious. As I zipped up the corridor spitting rocks and dirt behind me at 30 mpg, I said, "What's the big deal? It's just another steep rocky thickly forested drainage..." When I came to work in Missoula, the tenured staff began to educate me on ***the special significance and CULTURE of the Rattlesnake to the Missoula public***. But it wasn't until I met and had the honor of several tours up the snake with Forest Poe, who was raised and lived at Poe Meadows, 3 miles up to the corridor, that I finally "got it" and the light came on. Forest Poe gifted me with first hand history, stories and showed me the places and ways the spirit of the snake moved his and other peoples' souls. What I learned was that I was totally unqualified to manage the snake before my peers and predecessors passed on the oral history and culture of the snake, before Poe educate me and before I had a hands and eyes on on-the-ground familiarity with the land and places in the snake. From the PA for the snake in the revised plan, it's obvious that no one on the planning team or forest has those qualifications. Those stories are our oral history, the story of who we are as a people, how we've toiled, how we've loved and lost and how we've move on past those mileposts of life. And all these lessons are there to be taught by the spirit of the snake. But you have to be open and want to learn.

Forest lived at Poe Meadows in the early 1900's, at a time when the heavy hand of man dominated the snake. There were mines, logging (the snake provided Missoula with most of its firewood), man caused wildfires, roads, telephone lines, a school, over 20 homesteads, outfitters and the full complement of man caused impact to the resources. There was also the most evil man on the creek, Coyote Bill Beeskove. Arguably, Beeskove single handedly caused more resource damage and human harm than any resident in snake history. (*see below)

A very little-known fact is that the turnaround for the snake, from a drainage heavily impacted and abused by man, to a place that was allowed to heal naturally and teach visitors that healing power and where nature was left alone to be the "manager" came from a vision quest. The trigger for that vision quest and what subsequently became a "movement" was the construction of new roads and logging in in the 1970's by Montana Power Company, who then owned 21,000 acres in the snake. During this vision quest, a human form was selected by higher powers to be the "vessel" or "conduit" for a movement that started with one person and then caught fire as the power of the snake spread throughout the community and into seats of power in Washington DC. The power of the snake brought together people from widely diverse backgrounds to unify, to put aside differences and work toward a

common goal. It was a powerful, unifying and lasting example of the Power of The People. That goal was the perpetual protection of the Rattlesnake drainage where man would back off and let Nature be the healer, let nature be in charge, and where people could LEARN from Nature.

In contemporary religions, one person like Jesus or Muhammad is the spiritual leader or called the Messiah and a book of rules, like the Bible or the Koran, is written by men. In the case of the snake, the unveiling of the spirit of the snake came through one person, but that person recognized that they were insignificant by name and was merely the vessel or conduit for that message and that the real Messiah of the snake was Nature, and that the rules were not written by men, but that the rules were the natural forces and rehabilitative power of Nature itself. The person was insignificant and merely a messenger who started a movement that resulted in the Rattlesnake Act of 1980, which protected the drainage from further man caused harm and directed the Forest Service to manage the drainage for recreation, wildlife, watershed and education.

Further intensifying and supporting the spiritual role of the snake is that spirit who guided the original vision quest was the wolf, the canine. This connection makes sense when we remember that it was Coyote, the creator (and another canine), who played a pivotal role in the Salish Kootenai story of creation. The Rattlesnake drainage is right next to the Salish Kootenai tribal lands. Two canine spirit guides in adjacent geographic drainages further supports the magical power and earth connection that the snake gives to those who hike, bike, ride and jog up there. Any Missoula visitor will firmly confirm how their spirit and soul are replenished after time in the snake. It is a place of inspiration and demonstrates the power of nature. It isn't "general forest" or just "a concentrated recreation area" or just "backcountry. It is greater and more powerful than its parts and has been treated that way in the current forest plan. That power is further demonstrated by how it has healed itself from historical human impacts with little or no help from man. I know for sure this is blowing the FS revision teams minds. There are no regulations or provisions in the 2012 Planning rule for the spirit and power and impact of a special place on the human soul because the FS sees the land as just physical and biological resources like water soil, wildlife, fish, etc.. ***The planning regulations, plan revision words or how fast you get it done are not the product or measures of success for forest planning they are just the tools to protect and honor the spirit of the land. How well the final plan honors and protects the spirit of the land and its effect on the human soul are the real measures of success for a forest plan.***

The words in the Rattlesnake Act were made and manipulated by man, committee and compromise but firmly enshrined protection for the snake. The snake was "Designated" to use contemporary white European terminology. The spirit and intent of the designation, to prevent logging and road construction and allow nature to heal itself and those who visit there was deeply burned into the Forest Service managers minds and souls when the Act passed. These same managers then did their best to use words to capture that spirit and intent in the goals and standards in the 1986 Lolo NF Plan and in the 1992 Rattlesnake National Recreation Area and Wilderness Limits of Acceptable Change based Management Direction. That spirit and intent was orally passed down from manager to manager from 1980 to 2015 and the message was "Hands-Off, Light-Handed Management, Nature is the healer in the snake".

Prior to about 2013-2014, the long tenured Lolo NF staff with deep relationships with the community, culture and the on the ground resource had been practicing and passing on the oral culture and traditions of Lolo land management to their successors. From the late 1970's to around 2013, most of the Lolo deciding officers, specialists and staff stayed on the forest for 10 to 20 years or more developed

deep community relationships and learned the culture of the forest and public. They had personal relationships with the community such that when a conflict arose, they had a positive relationship foundation from which to collaboratively work toward mutual solutions.

Around 2013-2014, a cultural shift inside the Lolo NF hit a critical mass where management and staff were no longer dominated by tenured staff who knew the history and culture of Lolo NF land management. A new, aggressive and green District Ranger got hired on the Missoula Ranger District at that time and despite the goals and standards in the 1986 Plan and 1992 LAC Direction and ignorant of the management history and culture of the RNRA, announced she would tell you what the standards did and did not allow and that she was going to rebuild the main corridor Road 99 and begin logging miles up into the RNRA under the Marshall Wood logging project.* Old long dead flames of opposition were reignited and another citizens coalition, which included some of the original Friends of the Rattlesnake (FOR) who reunified and stood in staunch opposition to this violation of the Lolo NF plan standards by the very people entrusted with enforcing them. The citizen coalition's opposition was also supported by opposition of a group called the Lolo Restoration Committee (LRC). Ironically, the LRC was a collaborative group formed BY the Lolo NF to agree to support a logging project on the forest. But the blatant disregard for the Lolo Forest plan standards for the RNRA combined with the complete ignorance and disrespect for the culture and spirit of the snake prompted the LRC to say NO WAY to the RNRA logging plans. The combined LRC and community opposition was so great, similar to the community groundswell that created the Rattlesnake Act of 1980, that the new ranger, after deeply damaging both public trust and the Forest's relationship with the conservation community, backed off and reluctantly agreed to follow the Lolo Forest plan standards and do the light on the land hand work up the main snake corridor. That hand work incidentally has since been touted as a great success, has had widespread public support and the current Missoula District Ranger said she wants to repeat it on other parts of the Missoula Ranger District

Fast forward to 2023. The frequent rotation of Forest Supervisors, District Rangers and on the ground managers on the forest has continued. The oral tradition of passing on the management culture and institutional management history memory is completely gone. No one on the forest even wants to know the management history. Enter the cyber based off forest plan revision team. AGAIN, the forest is proposing to build roads and log the snake in complete disrespect and disregard for the spirit of the snake, the reason the snake became an NRA, and to make it all worse, wants to deny the snake it's own Management Area like it has in the current forest plan. Instead, you want to chop the snake up into three more general and less restrictive Management Areas (MAs): MA 3 backcountry, MA 4 General Forest and MA 5 Concentrated Recreation Areas. That's not one but TWO attacks on the spirit and intent of the snake in only 10 years. Worse yet is that the revolving door of Lolo NF managers is so rapid that the current managers probably don't even remember the 2015 Marshall Woods logging attempt fiasco. STOP IT!

What are these three other Management Areas and why are they not right for the snake?

MA 3 is called Backcountry. Backcountry is the areas on the forest that the forest just never got to when they were roading and logging undeveloped areas as fast as they could from the 1970's to present. They are the default so far undeveloped area. They were not deliberately left alone or protected, there is just so much Lolo NF that the road engineers and logging didn't get there. **Backcountry is the "left overs"**

not quite good enough for Wilderness or Proposed Wilderness, but not yet roaded and logged. They are areas where the heavy hand of man has *not yet* impacted the land.

Backcountry areas are **suitable for logging** for “other multiple use purposes”, meaning any reason the FS wants to. They are also suitable for motorized travel “consistent with desired recreation opportunity spectrum settings as mapped and only on designated roads, trails, and areas”.

The snake is not “Backcountry”. The snake is a little 28,000-acre tract that HAS been roaded, developed, mined, logged, and burned and abused by man. **It’s a place where man** (the Lolo NF), in the 1986 Lolo NF Plan, **has deliberately said they will stop the heavy-handed management, let nature heal the area** and serve as a public education and demonstration area. The snake is definitely not a “left over”. The snake under the current forest plan and management history, unlike “Backcountry” is **also NOT suitable for commercial logging for any reason.**

Management Area 4 is called General Forest. General forest is the common forest areas with no distinguishing features, special characteristics or special designations. General forest is the areas where most any and all management is allowed. It includes the most heavily managed timber lands on the forest, those “suitable for timber production”. It’s where they go to “get the cut out”. It is open to road construction and all and any logging: to make lumber or to log for any “other multiple use purpose.” General forest does not have any special recreation resource value or designation. It’s just indistinguishable public land with or without trees on it.

The snake is not General Forest. The snake has the highest level of recognition and designation of any national forest land in the United States and is recognized for that in special federal legislation. **It is the highest value recreation resource and the ONLY area in all of Montana with the National Recreation Area designation. There is nothing “general” or common about it.** It is also NOT open to logging and road building for ANY reason under the current forest plan and management history.

Management Area 5 is Concentrated Recreation Areas. MA 5 includes Pattee Canyon, Blue Mountain and Snowbowl Ski Area and the Hiawatha Bicycle Trail. These are areas **where human caused recreation impacts and development dominate the landscape. Facilities are built and expanded to accommodate yet MORE recreation use. Recreation is directed to and concentrated in these areas. Concentrated means crowded, wall to wall people.** Concentrated recreation areas are places where managers have given up and let recreation dominate the resource and visual landscape. People encounters are frequent and there are no limitations on groups sizes and they are frequently crowded. ***In Concentrated Recreation Areas, Management is reactive to recreation impacts.***

Think of Pattee Canyon where recreation impacts such as a developed picnic area and shelter and a golf course dominate and impact the land. There are **paved roads**. The visual setting is dominated by recent logging and more logging is allowed, can and will occur in the future. Pattee Canyon is a highly developed, not primitive, recreation experience. Pattee Canyon has no standards for group size and no camping opportunities. ***Pattee Canyon is not nationally recognized for its recreation resource.***

Think of Blue Mountain that is dominated by wide trails, herds of loose dogs, dog manure everywhere, areas with motorized trail use and another golf course. Blue Mountain’s visual landscape is also dominated by recent logging and more logging planned for the near future. Think of Maclay Flat where people, developments, a huge parking lots dominated the landscape, there is no getting away from

development or people, no solitude. Unlike the snake, Blue Mountain is a highly developed, not primitive, recreation experience.

Blue Mountain has no standards for group size and no camping opportunities. ***Blue Mountain is not nationally recognized for its recreation resource.***

Think of Snowbowl with logged ski runs, roads criss-crossing the mountain side and built ski lifts completely dominate the landscape. **You have to pay to play.** Think of crowding. Logging is allowed and will continue for whatever reason a FS manager chooses. Unlike the snake, Snowbowl is a highly developed, not primitive, recreation experience. Snowbowl has no standards for group size and no camping opportunities. ***Snowbowl is not nationally recognized for its recreation resource.***

Think of the Hiawatha Bicycle Trail which is just another roadside attraction and tourist draw where you have to **pay to play**. The area is covered with open motorized roads, motorized shuttle busses zip tourists up and down the mountain, the bicycle trail itself is an old highly built and developed RR grade, wide and with many bridges. The entire landscape is open to road construction and logging. The Hiawatha bicycle trail is a highly developed, not primitive, recreation experience. The Hiawatha has no standards for group size and no camping opportunities. ***The Hiawatha bicycle trail is not nationally recognized for its recreation resource.***

The snake is NOT a Concentrated Recreation Area. In contrast with the above “concentrated recreation areas” in the revised forest plan PA, recreation management in the snake is not reactive, it is proactive. Management looks for factors that could diminish the primitive undeveloped recreation experience and prevent them before the impact the land and visitors. Recreation management in the snake emphasizes hands off, low impact practices that blend with the natural landscape. NATURE is the manager and healer in the snake with little, subtle or invisible “management” help. Logging and road building are not allowed. Light on the land hand vegetation management is used instead. ***LEAVE NO TRACE practices are in place and are the management mantra in contrast with the other “concentrated recreation areas” where “trace” dominates the landscape.*** There are no built recreation facilities like picnic areas, shelters, golf courses or ski lifts. **It’s free, you don’t pay to play.** There aren’t any motorized tourist shuttles or motorized trails. When you look at the snake, **recreation development and impacts do not dominate the visual landscape like they do at the other “concentrated recreation areas”.**

Even when the parking lot at the snake is filled to bursting, the snake has the ability to absorb and disperse people with such amazing power that you can still experience solitude. But I’ll bet the current batch of Lolo NF managers, let alone the revision team, don’t even know the land there well enough to know this. Group size standards further ensure the opportunity for solitude. Solitude and spiritual rejuvenation is further encouraged by the fact **you can camp and spend extended time there**, and that there are standards in place to protect that experience. The LAC standards for campsite standards, condition, road and trail condition and maintenance further protect the spirit of the snake and opportunity for UNDEVELOPED PRIMITIVE RECREATION.

The Rattlesnake has tremendous spiritual rejuvenating power. It is a place where the power of nature itself is seen and allowed to function with little or no management interference. The drainage has been abused and impacted by homesteads, roads, logging, mines, pipelines, dams roads and wildfires. And yet the land has been allowed to serve as a demonstration area for the power of natural recovery with

little help from man. ***The snake is a living testimony of the power of nature, natural recovery and hope for the future***

The below table displays the heavy historical impacts of man in the snake and how Nature, not man is allowed to heal the land.

Not All-Inclusive Disturbance History of the Rattlesnake Drainage

Approximate Date	Disturbance Event	Natural Healing
1844	Extensive commercial firewood cutting to provide Missoula with heat – floated out 2,500 cords down Rattlesnake Creek	Cutover areas recover to natural condition
1885-1887	RR tie cutting camps established – creek “improved by removing woody material to float logs out. Constructed a “splash dam” about 3 mi above mouth of Spring Gulch (Hog’s Back?)	Camps abandoned and recover. Cutover areas recover to natural condition
1871	Worden and Higgins organized first water company (Missoula Light and Water) and built a ditch a couple miles up the snake., replaced w a 2” wood bored pipe, then replaced with a wood stave 6” pipe.	Abandoned and recover to natural condition.
1911-1921	Water Co builds 8 dams in upper drainage in now Rattlesnake Wilderness	Still exist, Missoula acquired water company in 2017 and currently in process of evaluating and breaching and restoring where needed.
1906-1930	School House near MP 0.6 had 24 students at one time	FS acquired it’s 1 acre from Missoula School District(?) circa 1990. Foundation evident if you know where to look but naturally recovering to pre settlement condition
1900	Fred Poe settled at Hog’s Back, son Forest Poe then took it over	Sold ranch to MPC 1936 then FS acquired and the homestead naturally recovering to pre settlement condition.
Early 1900’s	The three Dutchmen build a cabin and start working a gold mine near MP 2	Nature has reclaimed the cabin site, there are a few sill logs there. The 66’ deep hard rock mine shaft is still there. Both are still there I know where to look.
Early 1900’s	Dam considered at the Hog’s Back natural dam site to provide water supply for Missoula	No dam ever built except perhaps small “splash dam” Mid/late 1800’s to float out RR ties. Splash dam naturally recovered.
Early 1900’s	Hunting/outfitting lodge at Franklin Bridge, later site of FS Franklin Guard Station	Burned down circa 1920. Naturally recovering to pre settlement condition
Early 1900’s	Telephone lines served drainage up to about MP 6 or 7 and from Sheep Mtn Lookout to Gold Creek Ranger Station	Abandon but you can some are still standing if you know where and what to look for.

Early 1900's	Lime kiln mine and 2-mile access road above Beeskove Creek provided lime for concrete construction in Missoula	You can still see them if you know where to look. Road and abandoned and naturally recovering to resettlement condition.
Early 1900's	Lovers Rock: Young snake raised boy smitten by snake raised girl climbs to the top of a high rock outcrop above Poe Meadows and paints a yellow heart on the rocks to get the girls attention and demonstrate his affection. Girl not impressed.	The yellow heart is still there if you know where to look.
1919	Aug 17, 1919: Chas Quast burns haystacks in what's now Lincoln Hill subdivision. Fire escapes and burns Sawmill Gulch, Spring Gulch, and main snake corridor to Placid Lake. Burned at least 2 homes.	Burned area naturally recovered
1929	Montana Power Co (MPC) acquires the water company	Missoula acquired water company in 2017 and currently in process of evaluating and breaching and restoring where needed
1929	Main corridor road ended at Franklin Bridge at MP 8	Road extended approx. MP 14 – perhaps in mid-1930's with CCC (unconfirmed)
Prior to 1936	19 Homesteads including 3 in Spring Gulch and 1 in Sawmill Gulch	Sold or reverted back to MPC and later acquired by the FS, - some of the foundations and fruit trees still evident but naturally recovering to pre settlement condition
1979	MPC sells the water co. to Mtn Water Co (MWC).	Missoula acquired water company in 2017 and currently in process of evaluating and breaching and restoring where needed
1980	Rattlesnake Act put into law designating the National Recreation Area and Wilderness	
1980's	Forest Service permitted original snake resident Forest Poe to take senior citizens up the snake in a van for historical presentations	I was honored to meet Forest during this time and took these tours and leaned a lot about snake history and spiritual significance.
1984	Dogs originally prohibited to protect water quality, appealed and resolved with current dog regulations based on wildlife and water quality protection and social considerations (to prevent uncontrolled dog impacts like at Blue Mtn)	
1986	Lolo Forest Plan completed assigning RNRA Management Area 28 with specific goals and standards to protect the intent of	Further protected primitive undeveloped recreation in accordance

	the 1980 Act and the primitive undeveloped recreation resource.	with the intent of the legislation and set hard goals and standards to do that.
1986-1987	Giardia outbreak ends use of Rattlesnake Creek water for Missoula Muni water supply – MWC asks City County Health Dept to order beaver removal.	FS biologists determine beaver removal impractical and creek left to natural processes
1987	Main Rattlesnake Trailhead built with intense public scrutiny and involvement	
1988 or 1989	First 0.5 miles of Road 99 gravel surfaced to allow wheelchair access – intense public scrutiny and monitoring to ensure the road was not over built or surfaced to allow heavy equipment.	Surfacing has not been maintained and naturally restoring to more primitive condition.
1992	Rattlesnake Limits of Acceptable Change base Management Direction completed after extensive public involvement and a with a citizen task force	Further protected primitive undeveloped recreation in accordance with the intent of the legislation and set additional standards to do that.
1995	FS recommends Rattlesnake Creek as Scenic under the Wild and Scenic Rivers Act.	
1997	FS does first aerial prescribed burn in the snake, huge controversy over smoke in the valley the next morning which cleared up by afternoon.	
1997	Entire main corridor and all the natural and homestead meadows were dominated by noxious weeds	FS begins treatment program to allow native and desirable vegetation to recover to near natural condition we see today.
2010's	MWC dam on lower Rattlesnake Creek below NF boundary is removed	Creek restored to natural condition.

In closing: Think: Holland Lake. That fiasco did the Forest Service deep, far reaching and maybe irreparable harm in terms of loss of public trust and confidence, not just on the Flathead NF but well beyond. **Think Crazy Mountains Big Elk Canyon access** and how the FS fought tooth and nail to deny the public access. **More** loss of public trust and lack of confidence in the FS. **These issue ripple far beyond the forests where they take place.** Make no mistake, the conservation community and the public are an interconnected web and are paying attention. I told you and I will say it again: **the Missoula public is very smart, very well educated, pays attention, knows more about these resources than the rotating short timer Forst staff, does not forget or forgive when either they or their public lands are mistreated AND NOW HAS A LASER FOCUS ON THIS ISSUE.** I learned this lesson really well when I worked on the Lolo and **it is even more true now after the Marshall Woods fiasco, the Holland Lake fiasco and the Big Elk Canyon fiasco.** **PLEASE DO NOT ADD a Rattlesnake National Recreation Area fiasco to that Region One list.**

Your treatment of the RNRA in the PA was sloppy and reckless and it's shocking to see how out of touch you are with the history, culture management and spirit of the RNRA. **It is major damage control time.**

FIX IT. You MUST get this right from here on out. Here's how to do that and please heed this advice from a guy who sat in your chair managing recreation and the RNRA for decades: Don't even try to defend your recklessness disregard for the RNRA at the upcoming April 25, 2025 special plan revising webinar on the RNRA. And do yourself and all of us out in public-land a favor: fire your high highfalutin self-important endlessly babbling "all your comments and questions are *WON DER FUL*" UNIVERSITY facilitator who shuts down any productive discussion. HOW MUCH are you paying the University for such embarrassing performances? That person is making the spirit of the snake mad and you don't want that.... Keep the guy who said what had to say but kept quiet most of the time and let people speak.

It's hard to believe you waited this long to have a meeting on the RNRA, but now the smart move is to ***admit your error right up front, take responsibility and begin a serious damage control and repair effort.*** I learned that lesson well too when I worked on the Lolo, if you screw up, admit it and fix it ASAP. If you try to defend the PA for the RNRA you'll only dig yourself deeper in a hole that's already pretty deep and you won't be able to get out.

From here forward,

- ***Don't even consider carrying an alternative to the draft that includes logging and roadbuilding in the RNRA or weakening any element in the current management.*** That is a non-viable straw dog alternative and will earn you a high place in the growing list of Forest Service Region 1 fiascos.
- ***Don't even consider trying to pit citizen against citizen*** with any "chicken little – the sky is falling" argument that if you don't log the RNRA all the houses will burn down. Current science by the top western wildfire scientists, (many of whom do their research out of Missoula) clearly concludes that: ***The best way to make existing wildfire- vulnerable developments ignition resistant is to work within the limited area of the "home ignition zone"—a home and its surroundings within 100 feet (which may include neighboring homes). The practice of modifying the built environment to growing wildfire risk requires multidisciplinary understanding of wildfire behavior, structural ignition vulnerabilities, urban resilience, and landscaping vegetation. And that: Homeowners should install nonignitable roofing materials and flame- and ember- resistant vents; clean gutters of flammable debris; ensure that wooden steps, fences, and decks do not directly contact a home's flammable materials; and remove flammable materials immediately surrounding buildings and under attached decks.*** Logging far into NF land in the RNRA will not protect homes.
- Carefully review and heed the rest of the findings in ***"Wildland-urban fire disasters aren't actually a wildfire problem,"*** by Calkin et al. 2023
- Carefully review Kreider, M.R., Higuera, P.E., Parks, S.A. et al. 2024, ***"Fire suppression makes wildfires more severe and accentuates impacts of climate change and fuel accumulation,"***
- ***Leave a legacy of leadership, solid stewardship, solid public relationships and astute listening.*** Right past wrongs, don't make them worse. I know you are getting big pats on the back for how fast you are "getting the plan done" but those pats are from high up and far away bureaucrats who know clueless about the forest, it's culture, it's history and it's on the ground resources and the spirit of this land. All they care about is the process and a check in the box by "another forest plan done". This isn't about a good performance rating for you next time or a quick and sloppy revised plan or sneaking things by under obscure "layers" and invisible "intent".

- Make no mistake, ***it's all about a solid, accountable and transparent forest plan to guide management and protect the on the ground resource on the Lolo NF through the next several decades.*** Think of Bob Marshall, think of Arnold Bolle, think of John Muir.... Think Walden Pond. Think of what Oroville Daniels, the Lolo Forest Supervisor when the RNRA was designated and who signed the 1986 Lolo NF Plan would do... AND DID: Keep the current management with additional protective provisions to keep us from having to do all this over and over and over again in the next several decades.

Thank you and I pray that you do the right thing for the snake. And that isn't logging, road building, and decreasing any of the current protections for the snake. **In a time of increasing recreation pressure, growing population, increasing human recreation damage and impact and climate change, the snake needs MORE not less protection.**

Please protect the RNRA as have those that came before you, and as intended by the spirit guide who started the effort to get it designated in the first place. **Don't go down in history as the ones who destroyed the snake and reversed the work of those that toiled and fought for it. It's a magical place. A place to lift the human spirit. A place to rejuvenate the soul. It's a scared place for Missoula.** It's as sacred as any culturally and spiritually significant place is to our neighbors on the Salish Kootenai Reservation. We share canine creators and spirit guides with our tribal neighbors. You wouldn't destroy a Salish Kootenai culturally important place, so **don't destroy the most culturally important place to the Missoula community.**

Please **refer to my March 30, 2024 comments Letter ID 62960-5662-936** for specific provisions and plan components to include for the RNRA from here forward to fix this mess and respect the spirit of the snake.

I ask that you learn about, ***experience and embrace the spirit of the snake and it's powerful and beneficial effect it has on the human soul.*** There's no argument that there is no other place in the Northern Region, a statement fully supported by the national designation as a National Recreation Area. ***It's not only the soul and spirit of the snake but the soul and spirit of the tremendous energy that is Missoula. The snake is Missoula's Walden Pond.***

Angry spirits are bad. Don't mess with the snake.

Sincerely,

Andy Kulla

*According to Forest Poe in his book *Life In The Rattlesnake* (self-published), Coyote Bill Beeskove lived at what is now called Beeskove Meadows about 6 miles (?) up the snake around the turn of the century (1800 to 1900). He was said to have been a Colonel and scout for the US Army before he moved up the creek and had many Indian "trophies". Coyote claimed that all the timber and minerals in the snake belonged to him and everyone taking anyone had to pay him half. He violently enforced his claim. He also ended up in more than one fight and gunfights over this belief and he put up a gate to keep people from hauling minerals and cordwood to Missoula to sell. The three Swedes had a cabin and mine about 2 miles up the creek and one day Coyote pinned them down in the cabin shooting the rocks off their stone chimney until they gave him half of their paltry color. He finally shot a guy and then turned him into the Sheriff Missoula where he was tried and sentenced to death. His lawyer then convinced the

Judge that Missoula was prejudiced against him and then he was retried in Helena where he got 10 years at Deerlodge. He ended up serving only 6 ½ years from 1906-1912. When he was released, the Sheriff took him back to Missoula where he quickly found he had no friends. In those days people in prison couldn't own property so he sold all his property to the Snooks a Missoula family. Then he moved to Dixon to prospect. He eventually found some gold up Little Magpie Creek and went to Thompson Falls, the county seat, to file on his claim but when he returned to Little Magpie Creek no one heard from him again. So the Sheriff went up Little Magpie to investigate and found Coyote face down in a few inches of water in Magpie Creek with his throat and both his wrists cut. The never ruled if his death was suicide or murder and he was buried in Plains. ***(I always wondered if the spirit of the snake caught up with him, if it was just karma, or both.)***

*****The history of how the Marshall Wood logging project got away from the Lolo and morphed from a simple 1 section, 640 acres win/win trail and vegetation restoration project for an industrially logged Plum Creek Timberlands section the Forest Service acquired in Woods Gulch into the Marshall Wood Logging Fiasco project is available on request. Does anyone on the forest even know that history from 2008, when and how it all began? You HAVE to learn from your past so as to not repeat those mistakes in the future.***