

April 1, 2024

Re: Comments on the Proposed Action – Lolo National Forest Land Management Plan

To The Lolo Forest Planning Team,

Thank you for this opportunity to comment. My comments are specifically related to the Proposed Action for the Lolo National Forest Land Management Plan and have a focus on mountain biking. I have six areas of concern for my comments. Those areas are listed below with their justifications.

1. **Greater Missoula Area (Marshall Mountain, Rattlesnake NRA, Blue Mountain Recreation Area, Pattee Canyon Recreation Area, & Deep Creek)** – I strongly support statements in the Proposed Action that indicate prioritization of trail expansions in the Greater Missoula Area. I strongly encourage the Lolo NF to consider well beyond “three” opportunities for trail connectivity and creation of loop rides due to the numerous prospects that exist and the TOTAL stagnation of trail expansions that have occurred on the Lolo NF in the Missoula Area in the past 20 to 30 years to properly accommodate increased trail use, diversify trail user experience, and to help reduce user conflicts. Areas and trails that hold the most opportunity are the following:

- a. **Marshall Mountain** – The new Marshall Mountain County Park is a prime location for trail expansion to naturally occur since Missoula County already has conceptual trail layout plans for the property that could branch out into adjacent National Forest. Trail expansions might include connections to existing trails (such as the Sheep Mtn Trail), new trails on the east and/or west side of Marshall Canyon Rd, and potential connections toward BLM-owned land in the Gold Creek area. The BLM has expressed interest in trail expansion on their land in Gold Creek, and expanding the Marshall Mountain and Sheep Mountain Trail systems toward the BLM land geographically makes sense. These expansions would greatly enhance the attraction of mountain bikers to Marshall Mountain due to the diverse mix of frontcountry and backcountry experiences.

To prepare the Marshall Mountain area for trail expansion, I recommend revising the land management designation shown on the Proposed Action maps surrounding Marshall Mountain to a concentrated recreational designation.

- b. **Deep Creek** – The advanced user-made mountain bike trails in the “Deep Creek” provide an amazing opportunity for advanced mountain bikers that no other trail system near Missoula can. The trails are actually located south and east of Dry Gulch Rd (not Deep Creek), and one can easily use the road to pedal to the top (second switch back) or run a shuttle vehicle. I hold great hope that the Lolo NF can see the tremendous value in these trails and adopt them into their system using a potential partnership with a responsible party like Missoula County and/or MTB Missoula for trail management.
- c. **Blue Mountain Recreation Area** – Blue Mountain holds tremendous potential for trail expansion, not only for mountain bikes, but also for e-bikes and potentially motorcycles. Blue Mountain is currently the ONLY trail experience for e-bikes local to Missoula, and it is very limited at that. I highly recommend considering the following areas for potential trail expansion:
 - i. **Upper Hayes Creek** - The area between Blue Mountain Lookout Road (FSR 365) and Trail 6.05, surrounding Hayes Creek on the upper mountain. FSR 365 provides easy access to build and access a stacked loop trail system.

- ii. Deadman Gulch – The Lolo NF land surrounding Deadman Gulch (south of Trail 365) has become a maze of illegal motorcycle trails; however, this area holds tremendous potential for multi-use trail expansion when considering a large (821-acre) piece of land owned by the State of Montana abuts it and provides secondary access using Deadman Gulch.
- d. **Pattee Canyon Recreation Area** – This area is prime for a new singletrack trail connection between existing trails south of the Pattee Canyon and Crazy Canyon trailheads and the new “House of Sky” trail that traverses Mount Dean Stone and Mitten Mountain. Further, sensible connections into land currently owned by Five Valley’s Land Trust and the State of Montana within the Miller Creek drainage would also be facilitated.
- e. **Rattlesnake NRA** – Arguably the most popular trail system in Missoula due to its easy access and large array of “green” and “blue” level mountain bike trails. This area is obviously complicated by the Wilderness companionship, but the demand by mountain bikers for new and improved trails in the Rattlesnake NRA is absolutely tremendous. During my 10-years serving on the board for MTB Missoula, I noted that we were asked about trail expansions on nearly a weekly basis by our constituents. Currently, the biggest opportunity in this location is for progressive trail re-routes (like the highly successful Fenceline Trail and Wallman Trail). However, on the near horizon is an excellent opportunity to make a connection toward the southwest toward Grant Creek onto nearby land owned by the City of Missoula and Allied Waste. Only a short connection on private property is needed for this to occur.

Ideally, the Lolo NF would choose to meaningfully expand the Rattlesnake NRA trail system to accommodate its heavy user pressure. Ideas include additional loop trails north of the Rattlesnake Creek “corridor” trail (Tr 515) toward Stuart Peak that connect into the Wallman Trail or Stuart Peak Trail for access.

- 2. **Heart Lake Loop** – It is extremely disappointing to see the Heart Lake Loop (Tr 111 to Stateline Trail 738 to Tr 175 to Heart Lake Trail 171) in the Hoodoo Roadless Area impacted by the Proposed Wilderness designation, and I oppose the current Proposed Wilderness boundary in this area. The Nez Perce Clearwater’s recently released Land Management Plan specifically accommodated this historic (and irreplaceable) backcountry mountain bike loop by opening access to the Stateline Trail, and I encourage Lolo NF to fully coordinate their own Forest Plan with the adjacent Forest that has set precedence. This would easily be done with a boundary adjustment or corridors that surround the trails named above. The boundary adjustment would represent less than a 2% loss in the Great Burn Proposed Wilderness aerial extent. Further, eliminating mountain bikers from this area through a Proposed Wilderness designation WILL NOT help conservation goals, since the majority of the pressure on the resource is a result of day and overnight hikers.

A second request for Hoodoo Roadless Area is to fully coordinate with the Nez Perce Clearwater National Forest to retain mountain bike access on the entire segment of the Stateline Trail 738 between Hoodoo Pass and Kid Lake. Trail 738 passes into the Lolo NF and Proposed Wilderness (per the Proposed Action) several times, but this trail should be managed consistently according to the Nez Perce Clearwater NF Land Management Plan that allows mountain bike access.

Aside from the revisions above, I otherwise support the boundaries of the Great Burn Proposed Wilderness area.

3. **Cube Iron Roadless Complex** – I strongly support the recommendation for a backcountry designation in this area which will maintain and protect its primitive characteristics but allow backcountry mountain bike access to this amazingly scenic area.
4. **Carlton Ridge Trail (1311) and Mill Creek Trail (1310)** – I strongly support that the Proposed Action keeps mountain bike access to these popular backcountry trails, and I support the Proposed Wilderness boundary expansion to the south and west of these trails (leaving them unaffected). On a related note, Trail 1310 is experiencing more motorcycle traffic, and it is quickly damaging the lower (north) end of the trail. I hope the Lolo NF reviews this issue and makes adjustments to motorcycle access or takes action (preferably in coordination with the trail caretaker MTB Missoula) to provide some sustainable re-routes.
5. **Stony Mountain** – I strongly support a backcountry designation for the Stony Mountain area. I have personally ridden an excellent loop using Trail 8002 (Beaverhead Deerlodge NF), to Trail 313, to Trail 1269. Although these trails are rarely maintained enough to ride without substantial deadfall, when they are maintained, they provide an irreplaceable backcountry loop opportunity for mountain bikes.
6. **Blackfoot Clearwater Stewardship Act (BCSA)** – It is completely puzzling and frustrating why the Lolo NF is not using the latest boundaries (submitted by Senator Tester) for the BCSA Proposed Wilderness area. I have supported the BCSA in the past due to its consideration of mountain bikes through boundary adjustments and new trail connections to allow loop opportunities for mountain bikes. It seems that the Lolo NF has reverted to a previous footprint for the BCSA Proposed Wilderness, and I can no longer support it. I encourage the Lolo NF to adopt the most recent BCSA Proposed Wilderness boundary and other stipulations of the Act to ensure that the previous 20 years of collaborative effort between supporting organizations is not lost.

General Topic: Class 1 (pedal assist) E-Bikes

The Lolo NF has made no mention at all in the Proposed Action regarding e-bikes. E-bikes are a very rapidly growing emerging technology, and it will become imperative for the Lolo NF to address them during the next 5 years, or the risk of user conflict and rampant illegal trail use is extremely high. I encourage the Lolo NF to take inventory of the current opportunities for e-bikes and consider whether those opportunities are adequate for the planning period. Although I am not an e-bike owner, I have seen an increase in frustrations from e-bikers over the severe lack of legal trail riding opportunities in the Missoula area. I have also seen a drastic uptick in illegal e-bike use on local trails (seen on almost every ride now). The Lolo NF's current stance of policing local trails and writing tickets is not the answer for e-bikes. Please take this subject seriously and incorporate real management for e-bikes, including providing additional e-bike opportunities on new or existing trails.

Thank you for your time and consideration of my comments. I look forward to the next phases of public participation.

Sincerely,
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