

April 1, 2024

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

Re: Lolo National Forest Proposed Action Comments

Dear Forest Plan Revision Team,

Thank you for the opportunity to comment on the management of Lolo National Forest Lands via the Proposed Action phase of the forest planning process. I am a Missoula resident who recreates on Lolo National Forest Lands weekly and appreciates these lands visually on a daily basis. Lolo National Forest lands set the stage for my life as a Missoula resident. The quality of these lands is directly related to my quality of life as a Missoulian. On a yearly basis I recreate and explore areas in every ranger district on the Lolo, from the Plains-Thompson Falls to Seeley District, and in every season.

As managers of the Lolo National Forest, you steward over two million remarkable acres, many of which have special values. But in thinking about the management I most want to prioritize encouraging in this process, I want to emphasize the importance of managing the Hoodoo Roadless Area, or Great Burn, as recommended Wilderness. I have had the opportunity through my work at a conservation non-profit, and as a board member of a Missoula-based recreation non-profit, to introduce many people to various corners of the Lolo National Forest. There isn't a single other place I have taken people that creates awe, reverence, and appreciation on the scale of the Great Burn. It's like taking someone to see Glacier National Park for the first time. The superlativeness, the uniqueness, the intactness, and the beauty of the Great Burn is stunning, palpable, and inspiring to even first-time, day visitors. It is surprising to very few that have visited the Great Burn to learn that it has been part of more than a dozen Wilderness proposals. The wilderness character values of this area are some of the highest in our region (for areas not yet designated).

For those that I have taken to this area, it is also easily apparent why the wildlife of this area would be sensitive to and negatively impacted by motorized and mechanized use in this area. Even hiking on the Stateline trail, it is quite easy, and common, to come closer than advised to a mountain goat also using the trail. The last time I hiked from the Hoodoo Pass trailhead I encountered a striking, dark morph of a red fox within two minutes of stepping on the trail. I see moose on a high percentage of my Great Burn visits. I've fallen asleep to the sound of a howling wolf pack at one of the area's alpine lakes.

The Lolo's current management of this area allows for non-conforming mechanized use by mountain bikes, and this allowance has created conflicts, confusion, and tension in our recreation community. This planning process has the opportunity to continue to protect the

Hoodoo Roadless Area's wilderness character by continuing to manage it as recommended Wilderness, but no longer allow for non-conforming mechanized use, which could not continue if the area is added to the National Wilderness Preservation System. Not allowing non-conforming uses will reduce user conflicts, confusion in the mechanized recreation community, and will protect the sensitive wildlife species of the Great Burn. It will also prevent conflicts with wildlife using the Great Burn's trails and will also prevent conflicts and potential collisions with family groups who are also common users of this area. In fact, the Stateline Trail, Heart Lake Basin area, and Kid Lake area are widely known as excellent areas for family backpacking trips and I have many friends and acquaintances who have introduced their children to backcountry overnight experiences for the first time in the Great Burn.

I believe that the quality of wilderness character found in the Hoodoo Roadless Area, in conjunction with its size as the largest recommended USFS Wilderness in Region 1 and the quality of modeled and utilized habitat for threatened and sensitive species including wolverine, grizzly bear, lynx, fisher, and native cutthroat trout will continue to elevate this area regionally and nationally for designation as Wilderness. As such, it should continue to be managed as recommended Wilderness.

Furthermore, an adjacent roadless area, the Meadow Creek-Upper North Fork Roadless Area is separated from the Hoodoo Roadless Area only by Hoodoo Pass Road and provides habitat and recreation values that mirror those found just across the road in Hoodoo Roadless Area. This area is contiguous with the Nez Perce-Clearwater National Forest IRA of the same name and there isn't a motorized boundary between them. Currently, this area is managed as non-motorized backcountry. I had the opportunity to collect wilderness character data about this roadless area in 2024 and found it to exhibit incredibly wild character and species diversity. This area should be evaluated as part of the larger whole that it connects to for wildlife and habitat. The Meadow Creek-Upper North Fork contains healthy old-growth cedar and ridgeline whitebark pine and mountain hemlock stands. There were abundant visual and audio sign of pika during my surveys on the area's ridgelines, as well as bobcat sign, wolf scat, and ungulate tracks. There were stunning alpine lakes on par with the lakes and basin prevalent in the Hoodoo Roadless Area. In covering over 30 miles of trail in this roadless area I never encountered another user.

Managing the Hoodoo and Meadow Creek-Upper North Fork as recommended Wilderness will protect future generations of wildlife and will preserve unique, high value opportunities for human recreation and solitude for generations to come as well.

I highlight these areas as two particularly deserving, but I also encourage the following areas to be managed as recommended Wilderness to protect similar values:

- **Areas included in the Blackfoot Clearwater Stewardship Act for Wilderness designation.** This community developed, collaborative proposal for the creation of Wilderness and recreation areas on the Seeley Ranger District has the support of 84% of Montanans. The legislation is moving through Congress presently and may be passed

before this planning process is complete. If not, these areas should continue to be managed as recommended Wilderness and the areas proposed for recreation management (mechanized and winter motorized) should be managed accordingly to minimize changes in management and the social challenges of adjusting management when the legislation is successful.

- **Cube Iron-Silcox/Cataract Roadless Complex.** This is the only place I have ever had the treat of watching a black bear chase a mountain goat, and this roadless complex provides important wildlife connectivity given that it is adjacent to the Cabinet Mountains Wilderness to the north. Grizzly bear activity is increasing in this area and will only continue to increase as the Cabinet-Yaak Recovery Zone goals are met. Another local collaborative effort, called the Cube Iron-Cataract Coalition, is advocating for the management of this area as recommended Wilderness and I support that community-driven recommendation.
- **South Fork Lolo Creek Roadless Area and the Carlton Ridge Research Natural Area.** There are very few places where western larch and subalpine larch hybridize. This is one, and it should be protected and managed for these special values.
- **Quigg and Stony Mountain Roadless Areas.** This area provides important wildlife habitat and connectivity with adjacent protected areas on both the Lolo (Welcome Creek Wilderness) and Bitterroot National Forests. It also is a migration zone for wildlife moving between the Garnet Mountains, Bob Marshall Wilderness Complex, and Seeley-Swan Valley. Protecting these upland areas above Rock Creek is important to maintain the clean and cold water sources that have allowed Rock Creek to be recognized as a blue ribbon trout stream, which is important to protect both wildlife populations and the associated local outdoor recreation economy (fly shops, outfitters and guides, etc.).

Beyond these recommendations for recommended Wilderness management, I encourage the Lolo National Forest to utilize this forest planning process to conduct or create plans to conduct a landscape-level recreation planning initiative that will address current and modeled future use patterns, infrastructure needs and pressure points, user needs, and conflict areas. This landscape-level approach to planning will ensure that we don't put band-aids on areas one-by-one, but that we plan and scale access infrastructure across the Lolo in a way that creates a functional system across the whole. While district level planning is often efficient, our growing recreation demands need to be addressed and evaluated in a way that extends across district boundaries. It also will be most effective if this planning effort includes input from the Bitterroot and Flathead National Forests.

I appreciate that the Confederated Salish and Kootenai Tribe is being engaged in this planning process as a cooperating agency, and particularly appreciate that they were engaged to write public-facing portions of the Proposed Action. I hope that this level of engagement will continue throughout the remaining portions of the planning process, and I think that I, and other members of our community, would appreciate community opportunities to hear from the tribe about what outcomes they'd like to see result from this Lolo process. If the Lolo National Forest can facilitate such learning opportunities, they would be beneficial to our growing community awareness of Tribal needs, values, history, and traditional ecological knowledge methods. When

and where appropriate, I hope that the Lolo will incorporate traditional ecological knowledge into the planning process, analysis, and plan alternatives.


There are many segments of rivers and streams being considered for Wild and Scenic River management through this process. I support the eligibility recommendations provided already for 21 rivers and streams, and encourage additional consideration to be given for inclusion of these river segments as well: Fish Creek and South Fork Fish Creek.

I frequently contribute to trail stewardship on the Lolo National Forest as a volunteer. The groups I volunteer with have indicated that it is challenging to create volunteer service agreements to contribute to stewardship on the Missoula Ranger District particularly. This district has encouraged Missoula-area non-profits to work together to co-host work days. While this has worked, it has served to limit the total amount of stewardship contributed by these groups by reducing the overall number of work days coordinated and completed and has also limited volunteer numbers – directly and indirectly. If this planning process can explore methods for increasing volunteer opportunities to contribute to the Missoula Ranger District that will allow more non-profits to obtain volunteer service agreements and work directly with their membership to host stewardship events, this will increase our community's ability to contribute to Lolo National Forest stewardship and will help our area non-profits to increasingly create a culture of stewardship among our recreation users.

I want to commend the Lolo National Forest district staff and the Lolo forest planning team for the quality and number of community engagement opportunities that have been offered in the first year plus of this planning process. I have engaged in several sessions and found them to be informative, a great way to have my questions answered, and also a way to provide information to inform the planning process (especially the session with table size maps with transparency overlays where we could add comments and engage in-depth dialogue). I know that considerable thought and planning is already going into the community engagement opportunities that will occur between the close of this comment period and the release of the DEIS. I look forward to continuing to participate in these events.

Thank you for the opportunity to comment on the Proposed Action. I look forward to continuing to engage in the years to come.

Sincerely,

A handwritten signature in black ink that reads "Erin Clark". The signature is written in a cursive style with a large initial "E".

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