

Kassia Randzio and Zack Porter
17 North Park Dr.
Montpelier, VT 05602

Carolyn Upton
Forest Supervisor
24 Fort Missoula Road
Missoula, MT 59804

RE: Lolo National Forest Land Management Plan Revision #62960

Dear Supervisor Upton and Lolo National Forest Plan Revision Team:

In addition to the comments below, we incorporate by reference the comments submitted by WildEarth Guardians and the Great Burn Conservation Alliance.

As managers of the Lolo National Forest, the fate of some of the largest and wildest unprotected roadless areas in the lower-48 states are in your hands. Grizzly bears, wolverines, bull trout, cougars, elk, and mountain goats, all creatures that one can expect to see on the trail in the Lolo NF, are found in few other places in the lower-48 or across their historic ranges. The Lolo NF is truly a remarkable place.

We appreciate that the Proposed Action carries existing Recommended Wilderness areas forward, but these recommendations must be expanded to reflect the current scientific understanding of the importance of such areas. In addition, we hope the Lolo NF will emphasize the opportunity that it has to be a national leader when it comes to management of mature and old-growth forests.

By age two, our daughter had already enjoyed time under the Great Burn's cedar canopies, practiced walking atop Grizzly Basin, camped amid Cube Iron mountain goats, toddled up Stoney Mountain, and communed with grizzly bears in recommended additions to the Scapegoat Wilderness. There are few places to build these kind of inter-generational memories, and few places where you can return year-upon-year with certainty that it'll be just as wild (or wilder) as it was the time before.

Specific Comments:

- ***“Unsuitable for timber production; harvest can occur”***: This designation appears in multiple tables throughout the proposed action. If an area is unsuitable for timber production, it should not be harvested. Period. It seems this language is designed to allow a loophole for salvage or pre-salvage logging, and logging to ostensibly control the risk of wildfire, all practices that result in the same kinds of roads, invasive species introduction, soil compaction, erosion, etc. as any other harvest operation. If an area is unsuitable for timber production, do not allow harvest at any time. Most of the areas designated as “Unsuitable for timber production; harvest can occur” are far away from the Wildland-Urban Interface, and logging for fire risk reduction or any other reason is scientifically unjustified.
- ***Riparian Management Zones***: Thank you for recognizing the importance of beaver, especially to restore RMZs. Please additionally prohibit trapping in these areas in order to foster the natural restoration of beaver and the ecosystems they create. The plan states “RMZs are not suitable for timber production. Timber harvest can occur

to improve ecological integrity of riparian, aquatic and upland ecosystems.” We recognize that large woody additions can be beneficial to riparian restoration, and even encourage future beaver colonization. However, this definition falls short by leaving the door open for the possibility of removing timber for commercial gain. Please refine this definition to clearly state that a) any harvested wood will remain on-site, and b) no roads, bridges, or similar infrastructure will be constructed in order to facilitate harvest. These modifications will ensure the plan’s worthy goals can be met, maximizing carbon retention and riparian restoration on-site, while minimizing soil erosion and compaction.

- **Conservation Watershed Network:** Thank you for taking steps to reduce road density and/or improve road infrastructure in these key areas. When removing roads, please ensure they are sufficiently replanted and blocked to eliminate motorized trespass or intrusion. These uses would significantly reduce the intended benefits motorized use is allowed.

Comments related to Chapter 70 Wilderness Recommendations:

- **Stoney Mountain and Quigg/Sliderock IRAs:** The proposed action includes Quigg Peak IRA as Proposed Wilderness, but leaves out the Stoney Mountain Roadless Area. Correct this oversight, and ensure that Stoney Mountain receives Recommended Wilderness Status as it did during the 2006 attempted Lolo NF Plan Revision.
- **Cube Iron-Mt. Silcox and Cherry Peak:** The unique geology and habitat of the Cube Iron-Mt. Silcox and Cherry Peak Roadless Areas, home to mountain goats and occasional grizzly bears, means this area should be recommended for addition to the Cabinet Mountains Wilderness. Unfortunately, the proposed action does not include any of this deserving area as Recommended Wilderness.
- **Lolo Peak:** An iconic part of the Missoula skyline, Lolo Peak includes the South Fork Lolo Creek Recommended Wilderness. Please retain the wild character of this special place. Importantly, continue to protect the Carlton Ridge Research Natural Area, where a unique hybridizing subalpine larch population is deserving of continued scientific study. Thank you for including a Recommended Wilderness in this area. The current map shows an adjacent Backcountry Area. Please change this Lolo Peak Backcountry Area to also be Recommended Wilderness, expanding protections for this unique area’s wild character.
- **Blackfoot-Clearwater (Bob Marshall and Scapegoat) landscape:** The Proposed Action leaves out critically important grizzly bear habitat adjacent to Recommended Wilderness additions to the Bob Marshall Wilderness. Recommended Wilderness boundaries should be extended across the Swan Front north of Grizzly Basin as is proposed by the Blackfoot Clearwater Stewardship Act.
- **The Great Burn:** Thank you for including the Hoodoo Roadless Area as Proposed Wilderness. Unfortunately, this is insufficient. The proposed action has completely overlooked the “String of Pearls” for Proposed Wilderness status. The Meadow Creek-Upper North Fork IRA and the Ward-Eagle IRA, among others, should be allowed to grow old and wild.
- **Reservation Divide:** this is an area that was also formally Recommended for wilderness designation in 2006. It is critically important for grizzly connectivity. It is also immediately adjacent to recommended wilderness managed by the Confederated Salish and Kootenai Tribes.

Comments specific to Forest Plan desired conditions:

Desired Condition, “Quality snowmobiling recreation opportunities exist along the State Line in the Hoodoo Pass and Hart [sic] Lake areas. Snowmobiling trespass does not occur in recommended wilderness.” Thank you for the desire to see a future Great Burn where snowmobiling trespass does not occur in recommended wilderness. This is valiant, but is doomed to fail if you also allow snowmobiling along the State Line, Hoodoo Pass, and Heart Lake areas. These areas are all too close to the recommended wilderness and too tempting for motorized trespass, and there is no magic line that would keep the roadless areas protected. In order to ensure this desired condition is met, please dial-back the decades of snowmobile intrusion that have occurred in this area, and prohibit all snowmobiling in these areas, creating a non-motorized buffer around the recommended wilderness in order to uphold your own recommendation and meet this desired condition.

The entirety of the Great Burn roadless area – including the Hoodoo Roadless Area and the adjacent “String of Pearls” roadless areas – should be Recommended Wilderness and managed to sustain and restore wilderness character.

How could we forget our first time in the Great Burn, fifteen years ago? Like so many others, we hiked up the trail to Heart Lake, passing through cedars and aspen, lush green understory and shady canopy, then crossed the outlet and – bam – there it was, Heart Lake pocketed in a steep green cirque. We continued on, climbing up to the top of the ridge to the Idaho/Montana divide, passing through the most glorious lupine and balsamroot peppered with larkspur. From the crest, with the Nez Perce-Clearwater National Forest to the west and the Lolo National Forest to the east, the northern Bitterroots continued ridge, upon ridge, upon ridge as far as the eye could see. Continuing south along the crest on the Stateline Trail, then passing past Pearl Lake on the way back to Heart, we were treated to mountain goat sightings.

I didn’t know much about the Great Burn (Hoodoo Roadless Area and String of Pearls) then, except that it was the kind of place that has the power to steal your heart. Since then, I’ve returned countless times, I’ve heard others’ stories of this place, and I’ve learned what the land means to area wildlife.

In winter, the Great Burn provides important refuge for mountain goats and key denning areas for wolverines. Mountain goats thrive on high elevation, south facing slopes, and – more than most ungulates – are particularly sensitive to motorized disturbances such as snow machines. Similarly, wolverines require quiet denning areas to rear their young. Both species are known to winter in the Great Burn, and both easily disturbed by motorized intrusions. Allowing any form of motorized recreation near mountain goat or wolverine habitat unnecessarily puts these species at risk. Please continue to prohibit winter snowmobiling in the Great Burn, and take steps to mitigate illegal motorized encroachment into the area.

In the spring and summer, many years the Great Burn welcomes a pioneering grizzly bear or two that boldly crosses I-90 and momentarily reclaims the bears’ lost Bitterroot range. The fact that grizzly bears make it to the Great Burn against all odds underscores the area’s high wildlife connectivity value for multiple species. Especially as wildlife adapt to a changing climate, these core habitat connections will be increasingly important. Please manage the Great Burn as a non-motorized and non-mechanized Recommended Wilderness, thereby reducing disturbance from noise, speed, and human recreation, and helping ensure the Great Burn is prepared to welcome back grizzly bears when they return.

With few exceptions, nearly every bear that does make it into the Great Burn is shot as a presumed black bear. Clearly, hunter education is not effective enough. I would like to see the forest do all in its power to prohibit black bear hunting within the Great Burn (Hoodoo Roadless Area and String of Pearls). Making the area off-limits to black bear hunters would eliminate the risk of pioneering grizzly bears being shot before they have a chance to establish home territory. I would like to see the forest require appropriate food storage and to eliminate bear baiting on the forest, especially in the Great Burn.

The Great Burn exists as it does today – complete with mountain goats, wolverines (and maybe soon, grizzly bears) -- only because of the foresight of those who came before you. After the fires of 1910, managers left the land to its own free will. Forests recovered, elk abounded, moose thrived. Leaders before you purposefully made the Great Burn off limits to roads and logging trucks, valuing the place for wildlife and quiet recreation above resource extraction.

As noted in the Proposed Action, the Lolo National Forest is rich with history central to the past and future of the entire U.S. National Forest system. The 1910 fires of the Great Burn are a central part of this history, spawning the forest service's over-zealous fire suppression strategies, the Ninemile Pack String, and the historic Ninemile tree nursery. Keeping the Great Burn wild, and allowing this vast landscape to naturally recover for hundreds of years to come, is an important way to commemorate these historic fires long into the future.

It is also important for scientific research. As stated in Chapter 1 of the proposed action, "In addition to primitive recreation, designated wilderness provides opportunities to study ecosystems that have been relatively undisturbed by non-indigenous humans, although Tribes may have been burning or otherwise managing these lands in pre-colonial times. They provide reference conditions for vegetation, watersheds, and wildlife, and provide secluded habitat." The entirety of the Great Burn and other Inventoried Roadless Areas provides a laboratory that should not be altered.

Please do all you can to leave generations to come a legacy of a wild, non-motorized, non-mechanized wildlands.

As I'm sure you'll hear in multitudes of comments, we all benefit from the prescient decisions of those who came before us, creating the conditions for solitude, awe, and wonder; refuge and homeland. Managers who came before you saw that there was something special about the Great Burn, and they worked to keep it that way. Today and for the decades to come, I implore you to do the same. There are few wilder places in the lower-48 states than the Lolo NF, and it's up to you to protect it.

Thanks for your careful consideration of these comments:

Kassia Randzio

Zack Porter