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Sent Via the Internet: <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>

Dear Supervisor Upton:

Wilderness Watch is providing these comments on the Proposed Action (PA) for revision of the Lolo National Forest Plan. Wilderness Watch is a national wilderness conservation organization focused on protecting all units of the National Wilderness Preservation System, including the Bob Marshall Wilderness Complex (Scapegoat Wilderness), Welcome Creek, Rattlesnake, and Selway-Bitterroot Wildernesses. These are some of the most iconic Wildernesses in the nation.

Our comments focus on the Wilderness, recommended Wilderness, and Rattlesnake National Recreation Area (including the Wilderness) sections of the PA. Wilderness Watch is also a signatory to and endorses the comments being submitted by the Flathead-Lolo-Bitterroot Citizen Task Force, WildEarth Guardians and several other organizations.

### **Background and Introduction**

The Lolo-Bitterroot Partnership, a partnership of citizens and citizen organizations including Wilderness Watch, developed a citizen plan for revision of the Lolo and the Bitterroot National Forests. We urge the Forest Service to include this alternative in the draft forest plan. Main topics in the citizen plan include Wilderness Administration and Recommended Wilderness. There is also a subtopic about the Rattlesnake Wilderness. Supporters of the partnership also submitted comments on the Assessment. Rather than repeat the Citizen Plan and Assessment comments, we summarize key elements below:

- **Wilderness Administration:** Wildernesses will be administered such that the forces of nature and not the actions of humans define their natural conditions. This includes allowing natural fire to play its role and foregoing manager-ignited fire. The concept of non-degradation shall be applied to limit visitor impacts. The general public should be given priority over commercial services when regulating use. In sum, the Forest Service Manual states it well, "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value." FSM 2320.6.

- Recommended Wilderness: In addition to including all of the areas recommended by the Lolo-Bitterroot Partnership citizen alternative, there needs to be solid direction to protect these roadless areas. The areas should be administered like Wilderness to the maximum extent possible. Of utmost importance, motorized and mechanized use should be banned.
- Rattlesnake Wilderness: The Forest Service should play a proactive role in encouraging the City of Missoula to breach the dams in the Rattlesnake Wilderness and to do so using traditional skills. Trail 515 (the cherrystem) above Franklin Bridge should be rehabilitated and recommended for inclusion in the Rattlesnake Wilderness.
- The existing wilderness management plans that have been incorporated into the current forest plan should be retained and incorporated into the new forest plan. The Assessment didn't identify a need for change (it unfortunately had a paucity of information about conditions in the existing Wilderness), nor has the PA justified any changes.

### **Wilderness**

A major concern with the proposed action is the lack of clarity on whether the extant wilderness management plans, including the Rattlesnake NRA Plan, will be incorporated into the new forest plan. These plans were developed after years of public involvement and should be carried over into the new forest plan. Nothing we can find in the planning documents indicates a need for change in these plans. That's not to suggest we think the existing plans are perfect or shouldn't be revisited, but any process to amend them should be as thorough and focused as the process that developed them. This current forest planning effort doesn't meet that standard.

Other revised plans in Region 1 have adopted the existing wilderness management plans, including standards, as part of the revision effort. The Lolo forest plan should follow suit.

### **Wilderness: Plan Components**

The PA recognizes the importance of allowing the free-play of natural processes in the desired conditions section for Wilderness. That said, desired conditions as they are typically used don't fit well with the mandates of wilderness administration because the desired conditions in Wilderness are what nature creates, not something managers manage toward. It's about process, not endpoints.

Below we suggest how wilderness character can be preserved by turning broader ideas into standards or suitability components. In discussion below we quote specific elements from the PA in *italics* and then provide comments and suggestions below that in plain text.

#### **Proposed Desired Conditions (MA1-DC, pages152-153)**

*01 The untrammled quality of wilderness is unhindered and free from modern human control or manipulation.* We agree with this desired condition and suggest it should also be stated as a

management standard. An example could be, “The Forest Service will neither approve nor undertake trammeling action in Wilderness.”

**02** *Designated wilderness areas preserve wilderness character as defined by the Wilderness Act and the wilderness areas’ enabling legislation.*

The Wilderness Act defines “wilderness” but it doesn’t define “wilderness character.” The agency’s attempt to do so, such as in the *Keeping it Wild 2* publication, utilizes some of the characteristics of wilderness to develop a monitoring protocol, but it can’t define what the statute intentionally did not. This section should simply read, “Wilderness character is preserved in designated wilderness.”

**03** *Natural ecological processes and disturbances (such as succession, wildfire, avalanches, insects, and disease) are the primary forces affecting the composition, structure, and pattern of vegetation. Wilderness areas provide opportunities for visitors to experience natural ecological processes and disturbances with a limited amount of human influence.* This statement should be strengthened by stating that management activities that attempt to influence these processes will not be undertaken in Wilderness.

**04** *Wilderness exhibits an undeveloped quality and is without nonconforming or unnecessary facilities, installations, or human-caused surface disturbances.* This statement should be strengthened by stating no new facilities or installations will be allowed except necessary trail reroutes.

**05** *Outstanding opportunities for solitude or primitive and unconfined recreation are available, where impacts to wilderness character are not degraded.* The intent appears to be good, but as noted above the focus should be on the conditions relating to wilderness. The provision should read, “Outstanding opportunities for solitude or primitive and unconfined recreation are available to the extent that wilderness conditions are maintained or improved.”

**06** *Each wilderness area accommodates levels of recreation use that are ecologically sustainable while maintaining or enhancing wilderness character.* This statement is puzzling since it’s hard to envision any level of recreation use that enhances wilderness character.

**08** *Wilderness areas are available for conducting, inventorying, monitoring, and research that is deemed wilderness dependent. Findings from research projects help improve the management of wilderness or preservation of wilderness character.* It’s true that the scientific value of wilderness is one of its most important, however a lot of “wilderness-dependent” research is not necessary nor the minimum required for administering the area. Thus, it’s important that all research projects comply with the Act’s general prohibition against motorized access and motorized equipment, installations and structures. The statement should be modified to read, “Wilderness areas are available for research that is deemed wilderness dependent and doesn’t rely on motor vehicles, equipment, structures or other uses that are generally prohibited in Wilderness. Findings from research projects help improve the management of wilderness or preservation of wilderness character.”

**09** *Non-infested areas remain free of invasive species. Where invasive species occur, their range*

*is reduced where possible, or at a minimum, they do not expand and they do not disrupt ecological functions. Invasive plant introduction through recreational use is prevented.* This should be changed to, “Preventive measures are the means to address invasive plant introduction.” The first two sentences imply significant trammeling that is inconsistent with wilderness preservation and should be eliminated.

*11 Lands degraded prior to wilderness designation, such old gravel quarries, mineral exploratory sites, and weed infested areas, trend towards their natural ecological state.* This should read, “Lands degraded prior to wilderness designation should be allowed to naturally recover.”

*12 Facilities within designated wilderness provide for the management, protection, and use of the wilderness. Facilities and structures with significant historic values contribute to the wilderness character. Facilities, trails, and signage within wilderness areas are minimal and constructed of rustic, native, or natural-appearing materials.* This section should be altered as parts of it are inconsistent with Wilderness law. Section 4(c) prohibits installations and structures unless they are the minimum necessary for preservation as Wilderness, and not merely a convenience to visitors. Moreover, historic structures can’t contribute to wilderness character as they represent the very “expanding settlement” the law sought to prevent. This provision should be changed to read, “Facilities within designated wilderness are the minimum necessary for preservation as Wilderness and constructed of rustic, native, or natural-appearing materials.”

The following should be moved to the goal section and altered accordingly:

*10 Outfitter and guiding opportunities meet an identified public need, the agencies’ wilderness objectives and provide benefits to the wilderness resource.* This could be better worded as, “Outfitting and guiding opportunities are allowed only to the extent they are necessary and proper as per the Wilderness Act and where conditions on the ground are within wilderness management plan standards.”

### **Proposed Goals: (MA1-GO, page 153)**

*01 The LNF continues existing partnerships and seeks new partnerships and individual volunteers to foster wilderness stewardship and encourage volunteerism in the Wilderness Areas.* We’re concerned this goal undercuts establishing and maintaining a professional wilderness staff and ranger program. What it shows is the disrespect the agency has for the wilderness “resource” and the need for professional wilderness stewards to oversee and protect it. It shouldn’t be lost on anyone that there isn’t an equivalent standard for the timber, range, or mineral programs. Why not rely on volunteerism to carry out those programs? The statement should be changed to read, “The LNF will build and maintain a professional wilderness staff fully capable of administering the Wildernesses on the LNF. Volunteers and partnerships will be encouraged where appropriate.”

*02 The LNF works in collaboration with adjacent national forests to manage the Bob Marshall Wilderness Complex and the Selway Bitterroot Wilderness.* This goal should result in keeping the

current wilderness management plans, including the standards, as part of the forest plan.

**Proposed Objectives: (MA1-OBJ, page 153)**

*01 Per decade, remove three facilities, improvements or uses that are not suitable for wilderness.* Why are there facilities, improvements or uses that are not suitable for Wilderness, what are they, and where do they occur? The statement should be changes so that removal isn't limited to three per decade, though three may be an appropriate minimum number.

**Proposed Standards (MA1-STD, pages 153 and 154)**

In addition to the standards suggested above (and below, moving guidelines to standards)

*01 New or reconstructed trails shall not be designed above trail class 3 within the wilderness.* This should be revised to read, *“New or reconstructed trails will only be built where necessary to meet minimum requirements for protecting the Wilderness and shall not be designed above trail class 3 within the Wilderness.*

*02 New special use authorizations shall only be authorized as consistent with the Wilderness Act and maintains the state of existing wilderness zones.* This should be revised to read, *“New special use authorizations shall only be authorized as consistent with the Wilderness Act, existing management plans and maintain the state of existing wilderness zones.*

*03 Authorizations for use of motor vehicles, motorized equipment, or mechanical transport shall be limited to the minimum necessary for the purpose of wilderness or human health and safety.* With regard to health and safety, the law allows for motorized use only in “emergencies,” not for any purpose related to health and safety. The statement should be changed to, *“Authorizations for use of motor vehicles, motorized equipment, or mechanical transport shall be limited to the minimum necessary for the purpose of wilderness or for emergencies involving the health and safety of persons within the wilderness.”*

We suggest adding these as standards:

- No new facilities or installations will be allowed in Wilderness except necessary trail reroutes.
- To maintain wilderness character, there should be no net increase in miles of system trails within wilderness, unless trail re-routes are necessary for resource protection or after natural occurrences such as fire, floods, windstorms, and avalanches. Trail re-routes should use the best long-term sustainable routes with minimal trail infrastructure.
- To protect social and ecological conditions and to limit the impact of commercial enterprise on wilderness, new outfitter guide service days will only be authorized if they

are necessary and proper.

- Recreation livestock are prohibited from tethering and grazing within 100 feet of lakeshores except during watering or when traveling through an area.

Proposed Suitability (MA1-SUIT, page 154)<sup>1</sup>

*01 Designated wilderness areas are not suitable for new administrative facilities or permanent structures unless they are necessary to meet minimum requirement for the administration of the area.* This should be modified to read, “Designated Wilderness is not suitable for new administrative facilities or permanent structures unless they are necessary to meet minimum requirement for the administration of the area as Wilderness.”

*02 Designated wilderness areas are not suitable for mechanized transport or motorized equipment, except in emergency or other special situations such as the exercise of valid existing rights, or for the purpose of human health and safety.* This should be modified to read, “Designated Wilderness is not suitable for mechanized transport or motorized equipment, except in emergencies involving the health and safety of persons in the area or other special situations such as the exercise of valid existing rights.”

*06 Designated wilderness areas are not suitable for recreational and commercial drone launching and landings.* This should be altered to read, “Designated Wilderness is not suitable for any drone use, including launching and landings.”

## **Rattlesnake NRA**

### Desired Conditions (GM-NRA-DC)

*02 Access to the area is provided by the main trailhead at the southwest boundary, as well as from the Grant Creek, Sawmill Gulch, Woods Gulch, and Sheep Mountain trailheads.* The Forest Service should ban using the lifts at Snowbowl to access the Rattlesnake Wilderness. The East Fork Grant Creek trail was closed many years ago in large part to keep the western-most part of the Wilderness as remote and wild as possible. Allowing access via Snowbowl’s lifts undermines that goal.

03 Management, utilization, and disposal of natural resources promote, are compatible with, and do not significantly impair the purpose for which the Rattlesnake NRA was established. *This*

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<sup>1</sup> Appendix 2 page A2-3 states that “[p]rescribed fire and hand fuels treatments” might be compatible in Wilderness. This is not reflected in the Wilderness Suitability portion of the PA. Regardless, these actions are not compatible with Wilderness. Also, the same page states that “[p]ersonal use: special forest products and firewood” are compatible with Wilderness when page 154 of the PA states, “firewood, post and poles, Christmas trees, [and] boughs” are unsuitable in Wilderness.

*statement is at odds with requirements for administering the Rattlesnake Wilderness, where natural resources aren't available for "disposal" and where non-degradation, not "significantly impair" is the standard for management. Moreover, it's an inappropriate desired condition for the NRA as a whole. The entire area has a unique, reverent stature for the people of Missoula. Nothing should be allowed to impair it.*

*05 The dams in the Rattlesnake Wilderness portion of the NRA, which are part of the Missoula Municipal watershed and constructed prior to Wilderness designation, are operational and safe. Many of the dams in the Rattlesnake haven't been operational for decades and to make them so would inflict significant and unnecessary impacts on the Rattlesnake Wilderness. And while the dams belong to the City of Missoula, they are not part of the municipal water supply, as the statement implies. The desired future condition should be that the dams are breached using traditional skills and the Forest Service should be doing all it can to work toward that end.*

Forest Service management treats the Rattlesnake as just a heavily used part of the national forest, but it is much more than that to local residents. If anything, the forest plan should include a desired condition to restore some of the peace and quiet that exemplified the Rattlesnake just a few decades ago. Missoula is growing and the demands for outdoor recreation are displacing wildlife and traditional users of these areas. The non-wilderness part of Rattlesnake NRA should primarily be administered to preserve habitat for wildlife and opportunities for quiet contemplative recreation uses like hiking and horseback riding, not for high-speed, machine-focused activities.

Suitability (GM-NRA-SUIT)

*01 The Rattlesnake NRA is unsuitable for timber production. Harvest may occur for purposes such as providing for research, visitor safety, fuel reduction, and achieving desired vegetation conditions. Use of the word "harvest" belies the FS attempts to convince the public it isn't eyeing the Rattlesnake NRA for commercial logging. Harvest suggests a crop, and there's no "crop" associated with obtaining wood for research, removing a few trees for visitor safety, or for the euphemistic "fuel reduction." The entire NRA must be off-limits to all logging—commercial and noncommercial—as well as road-building, additional trail building, or any activity that significantly alters natural processes in this special place.*

### **Recommended Wilderness**

The PA is not clear on a couple of points. Have roadless/unroaded areas been excluded during the evaluation so they won't appear as recommended Wilderness under any alternative in the draft EIS? Appendix 8 does not shed any light on this question. Why are trails that may be open to motorized use currently excluded from the inventory when these trails could be closed in this planning process if any given area is recommended for wilderness designation? It suggests, that travel planning is an irreversible commitment of resources and travel planning supersedes the forest planning process.

The PA repeats the agency wilderness recommendations from 1986, however the map of the recommended Bob Marshall Complex addition in the PA is different than that of the 1986 Forest

Plan. The 1986 Forest Plan Map includes McCabe Creek and Spread Creek. The PA map clearly excludes McCabe Creek and most of the Spread Creek drainage, while adding land around Monture Creek. Is there an explanation for these changes?

In general, the section on managing recommended Wilderness is a step in the right direction but it still allows some activities that are incompatible with eventual designation (see also the discussion on designated Wilderness). They are addressed below.

### **Recommended Wilderness: Plan Components**

Proposed Standards: (MA2-STD, page 155, see also the Wilderness section)

*01 Within recommended wilderness areas new leases for leasable minerals shall include a no surface occupancy stipulation. An NSO stipulation can be waived. The agency has the discretion to deny leasing in recommended Wilderness or anywhere on the national forest for resource reasons. The standard should read, “Within recommended wilderness areas no new leases for leasable minerals will be allowed.”*

*02 New recreation events shall not be authorized.*

It’s unclear whether events that might have been authorized in the past and are proposed again would be considered “new” events? Since the on-the-ground effects of new or established events are the same and since competitive events are not compatible with Wilderness, this standard should be changed to, “Recreation events shall not be authorized.”

Proposed Guidelines (MA2-GDL, pages 155 and 156)

*01 To maintain limits on structures in recommended wilderness, new range improvements associated with existing allotments should be authorized only for the purpose of enhancing wilderness characteristics or for resource protection. By definition, range structures do not enhance wilderness characteristics. This should be changed to, “To maintain limits on structures in recommended wilderness, new range improvements associated with existing allotments can only be authorized for the purpose of necessary resource protection.”*

*02 To maintain and protect wilderness characteristics, other agencies’ communications sites for public safety should be located outside of recommended wilderness areas unless no other alternative is available. If they must be located in a recommended wilderness area, they should blend with the environment and be located away from system trails and developed sites. In part because other agencies might employ commercial entities to provide communication services, this should be changed to, “To maintain and protect wilderness characteristics, other agencies’ communications sites for public safety must be located outside of recommended Wilderness.”*

*04 To maintain and protect wilderness characteristics, recreation livestock should be prohibited from tethering and grazing within 100 feet of lakeshores except during watering or when traveling through an area. Exceptions may be justified by terrain that does not allow for a 100-foot distance. This should be changed to, “Recreation livestock are prohibited from tethering and grazing within 100 feet of lakeshores except during watering or when traveling through an area.”*



Proposed Suitability (MA2-SUIT, page 156)

While these are generally good, there are some that need to be changed to protect the suitability of areas for designation.

*04 Permitted livestock use may only be suitable in those portions of recommended wilderness areas where grazing had been established prior to the area being identified as recommended wilderness.* There is no requirement that the agency continue grazing in areas recommended for designation, and in virtually every instance livestock grazing degrades wilderness values. This should be changed to, “Permitted livestock use may only be suitable in those portions of recommended wilderness areas where grazing is currently ongoing. Vacant or unallotted areas will remain so. Where permits are waived back to the Forest Service, those allotments will not be reissued for livestock grazing.”

*05 Recommended wilderness areas are not suitable for new developed recreation sites and/or facilities except to prevent resource degradation.* Developed recreation-sites and facilities are not compatible with eventual designation. This should be changed to, “Recommended wilderness areas are not suitable for new developed recreation sites and/or facilities.”

Sincerely,

Gary Macfarlane