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Lolo National Forest Supervisor  
24 Fort Missoula Rd  
Missoula, MT 59804

MISSOULA RANGER DISTRICT

MAR 25 2020

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Dear Lolo Forest Supervisor:

This letter is the Back Country Horsemen of Missoula's (BCHM) response to the draft proposal for the Lolo National Forest Revision Plan.

We appreciate the process for involving the public. BCHM members have attended virtual sessions and in-person sessions: 2 Missoula Ranger meetings; 2 Seeley Lake Ranger meetings; a Nine Mile Ranger meeting, and a Superior Ranger meeting. Additionally, we have attended 3 to 4 meetings at the University of Montana.

We are very pleased with the draft of the plan support existing proposed Wilderness.

The following are suggestions for areas in which we would like to see modified.

#### **GREAT BURN**

While the Lolo National Forest Revision Plan does recommend the Great Burn continue to be proposed Wilderness, the sister Nez Perce Clearwater National Forest Revision Plan recommends removing 40,000 acres of previously recommend Wilderness and for allowing the use of snowmobiles and mountain bikes. The Great Burn must be protected in its entirety. The amount of land proposed to be removed from proposed Wilderness is greater than the entire Rattlesnake Wilderness, which is about 33,000 acres.

The trails in the Great Burn, especially the State Line Trail, are more challenging than other areas BCHM has ridden, including: the Bob Marshall Wilderness Complex, Pintler Wilderness, Bitterroot Wilderness, Rattlesnake Wilderness, Teton Wilderness, Wind River Wilderness, Sapphire Wilderness Study Area (WSA), Blue Joint (WSA), East Pioneer (WSA), the Badger Two Medicine and the trails in Glacier Park from West Glacier to Essex. For example, the trail section from Goose Lake to Fish Lake has several steep pitches with drop offs being several hundred feet. To allow mountain bikes, that move fast and quietly, would present a major safety hazard for stock users and hikers, which would include Forest Service employees.

Snowmobiles:

- **Impact wildlife**

"Snowmobile noise and activity disturbs wintering wildlife – causing stress, elevated energy expenditures, and changes habitat use. In turn, these impacts can displace wildlife from their preferred habitat or even reduce an animal's chances of surviving the winter. (Specifically, wolverines, lynx, and mountain goats.)

- **Impacts to aquatic and terrestrial ecosystems**

Pollution from snowmobiles exhaust accumulates in the snowpack and is released during spring snowmelt, elevating the acidity of nearby surface water.

- **Soil and vegetation damage**

Snowmobiles cause significant damage to land cover through direct physical injury to plants/young trees and increase erosion in areas with inadequate snow cover. Snowmobiles compact the snow, affecting vegetation growth and development later in the year.

- **Impacts to the air and water quality**

Snowmobile exhaust contains dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, aldehydes, butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons. These pollutants degrade air quality and alter snow chemistry.

- **Noise Pollution**

Snowmobiles are loud and can be heard across vast distances (sound travels farther in the cold since the molecules are closer together), severely affecting the winter soundscape. The noise disturbs wildlife and is a primary factor in non-motorized use conflict.”

(Winter Wildland Alliance, 910 Main Street, Suite 235, **Boise, Idaho** 83702

[www.winterwildlands.org](http://www.winterwildlands.org) Peer reviewed published scientific journal articles were cited through the larger document)

Most importantly, allowing snowmobiles, having motors, and mountain bikes, being mechanized, would make the Great Burn ineligible for the Wilderness status it deserves. There are lots of lands presently available for snowmobiles and mountain bikes, just not in the Great Burn.

The Nez Perce Forest Plan gives priority to local communities and businesses. The Forester giving testimony in her letter on the plan notes her own personal history as a small business owner. The National Forests belong to all the people of the United States, not to a few local nearby communities.

The Saturday, February 17, 2024 edition of the Missoulian newspaper front page lead story tells of an intermountain states poll stating that people are united in the conservation of public lands and the natural environment. 85% of voters said that issues involving clean water and air, wildlife and public lands were important. The Lolo Forest Plan revision is to be based on science. Here is a scientific poll of what the majority of Americans in western states want. They need to be listened to, and not a small number of local residents.

We cannot let state lines divide the Great Burn as proposed Wilderness. It needs to remain intact.

Additionally, we would like to add to the Great Burn the String of Pearls area.

#### **TRAILHEADS LEADING INTO WILDERNESS**

We would like to see included in the revision plan the trails leading from the North Fork of the Blackfoot, Monture, Lodgepole and Pyramid Pass trailhead be designated as proposed Wilderness and not allow motorized use and, in particular, mountain bikes. These trailheads are portals to the Wilderness for

stock use. Horsemen can better control their riding horses in a user conflict but have little to no control over pack animals. In the present Lolo Forest Plan, mountain bikes are not allowed on these trails but it is happening. More legal protection with Wilderness designation and enforcement is needed.

#### **CUBE IRON SILCOX**

BCHM members have recreated in this area. They talk about the pristine quality of the land. They also talk about the solitude they found, not seeing another person on a multi-day trip. This land is also critical for connectivity for wildlife, in particular grizzly bears, to the Cabinets, Bitterroots and Mission Mountains. We would request this land be proposed Wilderness.

#### **ROCK CREEK**

We would like to see the Stoney Mountain Roadless area be included as proposed Wilderness. The Rock Creek drainage is world renowned for its fishing and quality of water. The area is also known for moose, elk, and big horn sheep. This area is also important for connectivity of elk to the Sapphires and for future of grizzly bears to the Bitterroots.

Thank you for this opportunity to respond to the draft of the Lolo Forest Revision Plan. It is a great start and hopefully it can be further fine-tuned.

On behalf of the Back Country Horsemen of Missoula,



Ken Brown

Vice President and Issues Committee Chairman

