

Dear Lolo Forest Planning Team:

Thank you for the opportunity to comment on your Proposed Action for the Lolo National Forest (LNF) Revised Forest Plan. So much has changed since the original Forest Plan; particularly the significant population increases around the LNF, and ensuing development, since 1986. Never has there been a time in which the protection of public lands has been so critical to the future we are leaving our grandchildren. So, thank you for taking on this critically important task.

My comments will follow the same structure as your Proposed Action.

Forestwide Direction:

Wild and Scenic Rivers:

Please add this Standard:

Eligible rivers will retain free-flow, water quality and protection of identified outstandingly remarkable values pending Congressional action or a suitability study. Any project or activity that causes impairment will be denied.

Geographic Area Direction

Greater Missoula Area

There are incorrect acreages for the Rattlesnake National Recreation Area (RNRA) and Wilderness throughout the entire document. Table 32, states that the RNRA is 60,030 when in fact the RNRA is 28,000 and the Rattlesnake Wilderness is 32,000 acres. Please make sure that in the final documents, you have acreages correct.

Desired Conditions:

03-Document states, " Management, utilization, and disposal of natural resources promote, are compatible with and do not significantly impair the purpose for which the RNRA was established." What does this mean? Please be more explicit so that the reader understands what exactly you are allowing. Also, instead of stating that these actions do not significantly impair, it should read DO NOT IMPAIR. I do not believe you have the option to allow impairment since the RNRA was designated by Congress. You must follow both the Rattlesnake Wilderness Act as well as the Congressional intent which is found in the hearings for that Act.

05-Please change this to read, The dams...that are determined to be the minimum necessary to meet the intent of the Rattlesnake Wilderness Act will be safe and operational. Others will be breached and/or removed in cooperation with the City of Missoula.

Suitability:

01-Change to read, The RNRA is not suitable for timber production or commercial harvesting.

Management Area Direction

MA1—Designated Wilderness

Wherever possible, take language directly from the Wilderness Act.

Guidelines:

02-Please change to read, “Native materials should be used whenever possible. Types of materials should be evaluated when completing the Minimum Requirements Decisions Analysis”. Drop “where cost prohibitive.”

05-Please change to read, “Outfitter and Guide service days should be authorized only to the extent necessary for realizing the recreation or other wilderness purposes of the area.”

**I believe that standards need to be added to support existing regulations that are specific to that Wilderness, i.e. party size, camping setbacks, etc.

MA2—Recommended Wilderness

Thank you for finding motorized and mechanized recreation use unsuitable for recommended Wilderness.

I agree with the areas being brought forward from the current Forest Plan, particularly the Great Burn.

Great Burn Area—Please retain the 1986 recommended wilderness boundary for the Hoodoo Roadless Area. Though the adjacent Nez Perce-Clearwater NF has made the decision to allow snowmobiles in the area south of the Stateline Trail and allow for mountain bikes on the Stateline Trail, the decision they have made is extremely detrimental to the entire Hoodoo Roadless Area. Please do not let their decision sway you to decide to destroy the critical protection that has been afforded this area for over 40 years.

This area provides a rich habitat for mountain goats, wolverine, and other wildlife at risk from motorized winter use.

Additionally, this area provides a wilderness-like recreation experience for many people in the region where very few of these types of experiences exist. Many of the recreationists who use the Heart Lake/Hoodoo Pass portion of the Great Burn are from Northern Idaho and the Spokane Area of Washington State. They travel to the Great

Burn because there are so few other areas, within a short drive, that provide a family-friendly hiking or horseback experience. Our son's first backpack trip was to Kid Lake and his second was to Heart Lake. This is not unique. Many families use these areas.

Neither the Heart Lake Trail nor the Stateline Trail are suitable for mountain bikes. Trail standards for mountain bike trails are significantly different from trail standards for hiker or horse trails. When mountain bikers use a trail that isn't built to mountain bike standards, the trail is destroyed. One just needs to walk on trails in the Blue Mountain Recreation Area to see the damage that has been done by mountain bikes. Mountain bikers have been observed carrying their bikes on the Stateline and adjacent trails because the terrain was so unsuitable for riding.

Also, mountain bikes are not a use that is compatible with either hikers or horses. As mentioned earlier, many families with small children use this area. I personally have nearly been run over by mountain bikes on Patty Canyon and Blue Mountain trails. In the Rattlesnake, hikers and horsemen have been displaced because of the heavy mountain bike use. Please keep snowmobiles and mountain bikes out of the Great Burn by continuing to recommend the entire area for Wilderness.

Please consider recommending the following areas for wilderness:

Cube Iron-Silcox—This is a vital wildlife corridor that connects the Cabinet, Bitterroot and Mission Mtns and is a popular recreation area for hikers and horsemen. The area rated high in your wilderness evaluation and there are no existing uses that conflict with restrictions in recommended Wilderness.

Lolo Peak/Creek Area—This critical roadless area provides an important connection between the Selway-Bitterroot Wilderness and the southern end of the Lolo National Forest. The Carlton Ridge Research Natural Area protects a unique larch population. Please consider including the boundaries of this area that were included in the LNF 2006 proposed action which would expand the RNA and include the RNA in the recommended wilderness.

Quigg/Rock Creek-Continue to recommend Quigg for wilderness but also recommend the Stony Mountain Roadless Area. This will provide critical protection for the Rock Creek watershed; Rock Creek being a prized blue-ribbon trout stream.

Reservation Divide-The 2006 LNF Proposed Action recommended this area for wilderness based on recommendations for the Confederated Salish Kootenai Tribe. It has unique features and provides important wildlife connectivity. Please recommend this area for wilderness.

Bob Marshall Additions—Grizzly Basin and Monture Creek are important areas that provide wilderness recreation experience and should not be at risk of having introduced uses that conflict with visitors wilderness experiences and result in unsafe visitor conflicts.

MA5-Concentrated Recreation Use

Rattlesnake NRA

I have serious concerns about the Rattlesnake NRA (RNRA) being included in MA5. There are a number of problems with the way the RNRA is treated in your proposed action. First, the acreages are incorrect and puzzling. In the Geographic Area Direction for the Greater Missoula Area, Table 32 shows that the RNRA is 60,030 acres. In fact, the NRA is actually 28,000 acres and 32,000 acres are in the Rattlesnake Wilderness. Then, in the MA5 direction, 15,168 acres is shown to be in MA5. Where is the remaining 12,832 acres?

The Rattlesnake NRA should not be included in the same Management Area as Lookout and Snowbowl Ski Areas or the Chain of Lakes. The RNRA is the only Congressionally designated Recreation Area in the Northern Region and only one of very few in the Nation. This should be explicitly acknowledged in the Forest Plan because it affords the area specific considerations. The setting, the uses, and the management are significantly different from those in the other areas included in MA5. Please create a Management Area specifically for the RNRA as it was in the 1986 LNF Plan. This MA should have specific standards that find timber production and commercial harvest unsuitable for this area. Allowances for cutting of trees should be explicit, road building or enhancement should be prohibited and there should be standards that support the current, existing regulations that are unique to this area, such as camping, dogs and party size.

It may be possible to have a Management Area that includes the Rattlesnake, Blue Mountain and Patty Canyon though some activities may be permissible in Blue Mountain and Patty Canyon that should be strictly prohibited in the Rattlesnake, such as road building or enhancement and commercial timber harvest. It seems like the cleanest way to deal with the Rattlesnake is to have a specific management area just for the Rattlesnake.

That concludes my comments. Thank you for your consideration.

Sincerely,

Christine Ryan



1709 Arlington Dr.
Missoula, MT 59801

mcryan2010@gmail.com