

April 7, 2024

Lolo National Forest Supervisor's Office / Attn: Amanda Milburn
24 Fort Missoula Rd
Missoula, MT 59804
SM.FS.LFNRevision@usda.gov

Dear Ms. Milburn;

I've previously commented on 3/30/24 on the regulatory aspects of the Proposed Action (PA) treatment of the Rattlesnake National Recreation Area (RNRA) and on 4/1/24 on the Spiritual and Cultural aspects and treatment of the RNRA.

I would now like to comment on the Monitoring section, I mean **LACK of a monitoring section for the RNRA** in the PA. My previous comments describe and reference my experience and familiarity with both the management and on the ground primitive undeveloped recreation resource in the snake, so I won't do that again now. Please incorporate that and my precious comments by reference here.

General Monitoring Comment: Have you even been following and monitoring the current 1992 LAC Monitoring plan?

There is an assumption that you have been managing the RNRA and monitoring the current standards for the RNRA in compliance with the 1986 Forest Plan and 1992 LAC standard's but nowhere in the PA and supporting documents do you indicate that. Furthermore, your omissions, misrepresentations and treatment of the RNRA in the PA indicate that **you may not even have the capacity, commitment, experience, funding or staffing to manage the RNRA** according to anything that's said in the PA or revised plan.

The issue and question here is whether you have the ability or commitment to manage the RNRA recreation resource at the present time let alone with your post PA stated "intent". Your commitment to the recreation resource in the RNRA is brought into question by:

- The mistreatment and dearth of protective "plan components" for the RNRA in the Proposed Action (reference my 3/30/24 letter for specifics)
- The lack of a permanent recreation specialist/advocate on the revision team,
- the lack of recreation management training and experience with the current Missoula Ranger District Ranger and
- That the Resource Assistant position on the Missoula Ranger District, **the job that is responsible for managing and advocating for the RNRA has been vacant for a long time**

Many in the public think that the Lolo revised plan should be held to the highest standard. The 1986 LNF Plan was one of the very first and best in the country. **You should want to perform at that same level.**

PA pg 162 Chapter 5: Plan Monitoring Program

The monitoring program will include a biennial monitoring evaluation report.

Comment: Biennial monitoring of the Limits of Acceptable Change (LAC) standards in the PA constitutes a significant decrease in frequency from the historic monitoring. Historically, LAC monitoring was conducted and reported on ANNUALLY, from at least 1992 (when the Limits of Acceptable Change based Management Direction was amended into the current LNF Plan) to 2014 or so when the Lolo made its first all-out attempt to disregard and violate the RNRA current goals and standards with the Marshall Woods logging project.

From 1992 to around 2013-14, LAC standards in the RNRA and Wilderness were monitored ANNUALLY and an ANNUAL report on those monitoring findings were documented and distributed to media and interested publics. Those monitoring reports clearly stated what standards were and were not met and what management actions would be taken to bring standards that were not met into standard.

There is currently more human pressure on the RNRA and associated human impact. It's difficult to comprehend why under those conditions you are REDUCING you monitoring in the RNRA. You should be INCREASING you monitoring to address that pressure and those impacts.

Recommendation: Show your continued commitment to the primitive undeveloped recreation resource in the RNRA and Wilderness by keeping and continuing to monitor the current LAC standard. Publicize those findings annually.

PA pg 163 5.2 Required 2012 Planning Rule Monitoring Items

Recommendation: Since the RNRA is the only congressionally designated area on the Lolo NF, the state of Montana and Region One, ***add a specific monitoring item called: "Rattlesnake National Recreation Area" or National Recreation Area(s)***. This will also give the public a little hope that you actually recognize the cultural and historical importance and uniqueness of this special recreation resource as a stand-alone resource.

Both Recommended Wilderness (not congressionally designated) AND Wilderness (congressionally designated) have their own Monitoring Item. The RNRA is a congressionally designated area just like Wilderness. ***Your omission of a Monitoring Item for the RNRA further supports my concern that you are doing everything you can to devalue and discount the recreation resource in the RNRA.***

Recommendation: Don't let the 2012 Planning Rule stop or prevent you from giving the RNRA its own monitoring category (and Management Area). ***Focus on the QUALITY of the plan content rather than the PROCESS*** and constraints of the 2012 Planning Rule. Remember, completing the revision is not a race to see who can get it done the fastest. Think QUALITY.

PA pg 174 Table 86 Recreation Opportunities (REC)

Comment: there is no mention of the RNRA LAC Direction standards.

Recommendation: You've indicated by email that deleting the RNRA LAC standards was not your "intent". Please demonstrate that "intent" here by adding, in clear and plain language (not under hidden layers or invisible "intent"), the RNRA LAC standards as an ANNUAL monitoring item as was done by the LNF in the past.

PA pg 175 Public Information, Interpretation, and Education (PUB)

Comment: I'm concerned, as is clearly demonstrated in the PA, that you have little or no commitment, other than lip service, to the recreation resource in the RNRA. **Tangible commitment means funding and staffing** and completed planning and on the ground work. Where has been and where will be the Public Information material to display the RNRA monitoring?

Recommendation: In response to this comment, for the last 5 years, **please clearly display how funding and staffing for recreation management on the Missoula Ranger District, the biggest recreation district on the forest, compares to funding and staffing on the Missoula Ranger District for 1) fire management and 2) logging, timber sale preparation, administration and silviculture (collectively).**

How will you monitor your Public Communication of the RNRA monitoring reports? Press releases? Public mailings? Email blasts? Other?

Comment: I'm concerned that you have stopped doing RNRA and Wilderness LAC monitoring entirely, especially since the 2014-15 Marshall Woods unsuccessful attack on the RNRA standards. (The Marshall Woods attack refers to the last time Lolo NF tried to violate the 1986 LNF Plan standards and commercially log the RNRA. This attempt was turned back by a citizens group and the Lolo's own Lolo Restoration Committee.)

Recommendation: While Pg 175 may not be the place, in your response to my comments in this letter, in a place open, available and easily accessible to the general public, **please provide the following information:**

- When was the last year that you did an RNRA and Wilderness monitoring report?
- What were the findings last RNRA LAC monitoring report?
- What is the current condition of the RNRA in relation to the current LAC standards?
- Display which years, from 2010 to present, you have done an annual RNRA LAC monitoring report and post the last 10 years RNRA LAC monitoring reports on the Plan Revision web page.
- State how long the Missoula Ranger District Resource Assistant position has been vacant and/or dysfunctional from 2015 to present and when and if you plan to fill that position. You can't be committed to recreation management when you don't even have a person in that position.
- For the last five years, have you had a dedicated RNRA and Wilderness on the ground position to monitor the RNRA LAC standards? If you had such a position, was it paid or volunteer?
- **To demonstrate your commitment to the recreation resource and ability to manage the recreation resource**, please display funding and staffing on the Missoula Ranger District for recreation management compared 1) fire management and 2) logging, timber sale preparation, administration and silviculture (collectively).

Finally, why aren't you "revising" the 1986 LNF Plan for the RNRA, meaning keeping the current management standards and adding additional protections? The PA doesn't "revise" anything in the RNRA, it proposes management of the RNRA as it was before the Rattlesnake Act of 1980.

Thank you for this opportunity to comment.

Sincerely,

Andy Kulla