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Citizens for Balanced Use

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Lolo National Forest Supervisor's Office
Attn: Lolo Plan Revision Team
24 Fort Missoula Road Missoula, MT 59804

Regarding the Lolo National Forest Plan Revision

To whom it may concern:

Please accept the following comments from Citizens for Balanced Use (CBU) regarding the proposed Lolo National Forest Plan. CBU is a 501(c)3 organization representing our more than 7000 active members and 100s of businesses in Montana and the North West U.S. CBU and our 68 supporting organizations represent more than 100,000 citizens across the western U.S.

CBU works to preserve access for multiple use recreation, promote active timber management, and support responsible resource development on our federally managed public lands.

Outdoor recreation benefits local communities across Montana in many ways including economically, physically, and emotionally. The demographics in Montana show the majority of people are older in age and this segment of our population requires modes of transportation such as motorized and mechanized use in order to experience and enjoy access to our federally managed public lands. Studies conducted by the Forest Service show 94% of the population recreate on lands open to multiple use while wilderness visits only represent 6% of the population. For these reasons CBU urges the Forest Service to provide adequate lands open to multiple use recreation in the new Lolo Forest Plan.

To provide more evidence of this fact I am including in Appendix A the recent study released in November of 2023 by the Bureau of Economic Analysis. This study shows on page 5 the number 1 national recreational activity is RVing. Boating and fishing is number 2 with motorcycling and ATVing coming in as number 3. The popularity of motorized recreation is the fastest growing outdoor recreational activity in Montana according to the 2013 survey conducted by the University of Montana Bureau of Business and Economic Research which I have included as Appendix B (snowmobiles) and Appendix C (OHVs). Appendix B and C also highlight one of the greatest concerns to both snowmobile and OHV user in Montana as being the loss of access and lack of access. Snowmobile and OHV access and opportunities in Montana continues to

decline as agency travel plans and land management plans have reduced areas open to multiple use recreation, both summer and winter.

I have included Appendix D, the HJ 13 study completed by the Montana legislature in 2016. This study highlights the amount of access that has been lost since the early 1990s to OHV and snowmobile use. According to the summary of results on page 2 of the study, a total of 21,951 miles of roads have been closed to motorized use by the Forest Service alone. Each and everyone of these roads were important to someone that historically accessed these facilities. Roads and access are vital to the proper management of these federally managed public lands and the economical sustainability of small local communities throughout the region and state. CBU requests the Forest Service take a hard look at the cumulative effect these past closures have had and the adverse effect on communities surrounding the Lolo National Forest. Also, the future benefits that outdoor recreation would bring to the region if more camping and multiple use facilities were expanded.

This study includes both summer and winter motorized use. (page 3 snowmobile Appendix, page 2 OHV Appendix). During the time period between 2004 and 2013 these activities doubled in Montana. It is reasonable to believe these activities doubled again during the time period between 2013 and 2024 as reflected in the results of the national Bureau of Economic report I have included as Appendix A. Again, this is a reflection of the growing aging population who have retired and their need for motorized transportation to access and enjoy our federally managed public lands.

The Forest Service must consider their responsibility to provide access to our public lands for this segment of the public that may be experiencing a lack of physical ability. The Forest Plan must consider the need for access to our elderly segment of the population as required by NEPA and the 2012 Planning Rule. As outdoor recreation is vital to small communities for their economic value, outdoor recreational access is also an important factor in human health, both physical health and mental health. Many studies have been conducted that show the health values associated with outdoor recreation.

In January of 2024 the USDA released their USDA Forest Service Action Plan called "Advancing Diversity, Equity, Inclusion, and Accessibility" (DEIA). (Appendix E) The DEIA is designed to address a lack of inclusion and diversity within the agency. While the agency has proposed this action plan for workforce within the agency, the inclusion, diversity, and accessibility should be brought forward in the Forest Plan in providing access to our federally managed land for a diversity of users.

The Forest Service has closed much of the access to motorized use in Region 1 which wrongfully excludes the majority of users. This DEIA is meant to address any prejudice, discrimination, intolerance, racism, bias, and bigotry within the Forest Service but the actions of discrimination continue against specific users of our public lands. CBU requests the Forest Service take a hard look at their actions of closures to a specific user group while allowing other users to access these same public lands. These closures targeted at people with special needs of motorized transportation to access our public lands can be considered a form of segregation. The Forest Service must not engage in segregation when developing the new Forest Plan. Shared use of our

public lands managed by the Forest Service must be supported and the Forest Service should support shared use rather than use statements such as “user conflict” and “desire to separate users” as justification to close specific areas to a diversity of users. These statements encourage prejudice, discrimination, intolerance, racism, and bias.

The new DEIA action plan released in January of 2024 has brought attention to the importance of diversity, equity, inclusion, and accessibility within the workforce of the agency and must be expanded to Forest Planning actions where past decisions have resulted in anti-diversity, anti-equity, anti-inclusion, and anti-accessibility. CBU requests the Forest Service take a hard look at their internal DEIA action plan and how it can be expanded to include issues of public access to our public lands.

The Forest Service has used wildlife disturbances as another reason for closing roads and trails to motorized use. A study released by the Colorado State University in December of 2016 indicates the majority of adverse effects of recreation on animals is caused by non-motorized use. “Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review.” Appendix F. The abstract on page 1 of this study makes the following statement: “Counter to public perception, non-motorized activities had more evidence for a negative effect of recreation than motorized activities.”

This was a study of published studies and shows the majority of documented studies indicate non-motorized recreation has a larger adverse effect on wildlife. Past Forest Service travel planning and forest planning actions have used studies that indicate adverse effects on wildlife caused by motorized recreation and failed to include those studies that indicate the adverse effects on non-motorized. Because the Forest Service omitted studies indicating the adverse effects of non-motorized, travel planning and forest planning resulted in closures to motorized recreation. CBU requests the Forest Service take a hard look at Appendix F and include this information in the Administrative Record.

The Lolo Forest Plan should include and display the information included in Appendix F as they make decisions on areas open and closed to motorized and non-motorized activity. The Forest Service should consider closing specific areas of the Lolo National Forest to non-motorized use and allow only access by motorized use to reduce adverse effects on wildlife. Without consideration of the greater adverse impact on wildlife by non-motorized use the Forest Service decision can be considered arbitrary and capricious.

The Forest Service is required under 16 U.S.C. 1604(a) to coordinate with local and state governments in land planning actions. The Forest Service in partnership with the National Association of Counties developed a guide to explain and accomplish the coordination process and requirement. The “County Governments and the USDA Forest Service” document “A Guidebook for Working Together” is included in Appendix G. Coordination is described in Section VI beginning on page 26 of this document.

Montana Law under 76-1-601 allows the counties to use their growth policy as the legal document in coordination with federal land managers in travel planning and forest planning revisions. All the counties in Montana have an adopted Growth Policy which the Forest Service

is required to review for inconsistencies when developing Forest Plan decisions. The Forest Service is “must try to be consistent with them unless prohibited by law.” “The final EIS, however, must contain results of this review, including consideration of local government objectives, the compatibility and interrelated impacts of Forest Service plan and local government policies, opportunities to contribute to common objectives, and ways to reduce conflicts between a Forest Service Plan and local policies.” (see page 28) See 36 CFR 219.4(b)(2).

Title 40, Chapter V, Sub-chapter A, Part 1506.2(d) provides the following requirement, “the EIS shall discuss any inconsistency of a proposed action with any approved State, Tribal, or local plan or law (whether or not federally sanctioned).” “Where inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the local plan or law.”

This is a very important part of developing the EIS for Forest Planning. CBU requests the Forest Service review the Growth Policy of counties adjacent to the Lolo National Forest early in the Forest planning process. Relevant parts of the county Growth Policy must be identified and included in both the DEIS alternatives and final EIS. Any inconsistencies found between the local Growth Policy and the final decision must be identified and the Forest Service is required to include in the EIS what inconsistencies were found, how the Forest Service attempted to be consistent with the local plan and why the Forest Service could not be consistent with the local plan.

CBU requests the Forest Service include in the DEIS what efforts were made to coordinate with local and State governments. Also, which local and state government agencies were contacted and who represented these local and state governments in the coordinating and cooperating agency process. CBU requests that the Forest Service include an alternative in the DEIS which is most consistent with the local Growth Policies of counties adjacent to the Lolo National Forest.

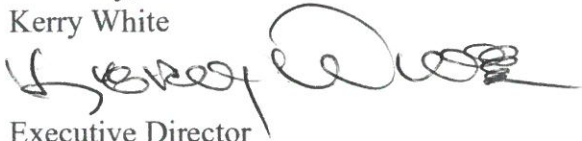
Finally, the Montana Fish Wildlife Parks and Recreation is currently developing a recreation plan for the Fish Creek area adjacent to the Lolo National Forest. This new recreation planning effort will include motorized roads and trails with connectors to the Lolo National Forest. CBU has included Appendix H which shows a map of possible connectors from Fish Creek to and through the Lolo National Forest. CBU requests the Forest Service to coordinate and cooperate with FWP in keeping motorized connectors available in these areas of cross jurisdictional boundaries so opportunities for connectors and loop opportunities are not lost in the new Forest Plan.

CBU has been involved in the Fish Creek planning effort along with several other clubs, organizations, and local county government and state legislators. Development of recreation in the Fish Creek area is very important to their future economic sustainability as Mineral County has lost much of its resource development opportunities in the past. The Forest Service should consider areas in this vicinity of the Lolo National Forest which would be available for expanding motorized trail systems and camping opportunities, both developed and dispersed.

Please include all the Appendix A through H and these comments from CBU in the Administrative Record.

Thank you for the opportunity to comment on the new Lolo National Forest planning process.

Sincerely,
Kerry White

A handwritten signature in black ink, appearing to read "Kerry White", with a large, stylized loop at the end.

Executive Director
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