

Data Submitted (UTC 11): 2/9/2024 1:51:57 PM

First name: Clifford and Pearl

Last name: Bove

Organization:

Title:

Comments: Gentlemen, please accept our comments regarding the Lolo National Forest Land Management Plan Revision.

We urge the Forest Service to set the tone of the LMP that emphasizes maximum preservation of wilderness, free flowing rivers, habitat connectivity, maintenance of habitat for keystone species. We also urge the Forest Service to become proactive in securing land parcels that become available and add them to the NF. This will prevent not only habitat fragmentation but to ease the burden of management and cost. A national forest landscape festooned with private parcels with countering management to that of the NF will ultimately lead to an extreme strain on Forest Service resources and NATURAL resources. We recommend this approach to all National Forest managers.

We first became acquainted with the Lolo NF in August of 1998 as part of a road trip from Utah and through Wyoming, Montana, Idaho. We did a backpack trip up the Monture Creek drainage and we camped at a small lake northeast of that drainage. We still have the old Forest Service map of the area. It was a flat river valley, we wanted to go easy, but we ended up at the lake. That's when we became aware something called a Bull Trout/Dolly Varden. Subsequently, we now understand that this fish is a species of concern and it inhabits that area. Also, we believe the area was hit by a forest fire.

So we'll start with the Upper Blackfoot Clearwater Geographic Area. This area has been recognized for excellent wildlife habitat, Summer and Winter range, fishery habitat as well as some prime farmland. Public monetary investment in this area is well documented, a.k.a the Blackfoot Challenge. Although not part of the scoping area of the Lolo NF LMP we urge the continued use of conservation easements in this iconic area to protect remaining acreage because it will augment land management efforts on the nearby Lolo NF. When we urge the Forest Service to be proactive, here is a template they can refer too. As per the LMP maps we urge the Lolo NF to recommend all roadless areas in the Upper Blackfoot Clearwater Geographic Area as Wilderness. The Monture sections offer low land wildlife habitat and riparian areas supporting the Bull Trout which is an indicator keystone species. Too many of our wilderness areas are "rocks and ice". The roadless area along the Bob Marshall Wilderness southwest boundary should likewise be recommended as wilderness because of the importance of its wildlife habitat and connectivity across the Swan Valley to the Mission Mountains. Also the considerable public monetary investment that occurred in the Swan Valley and Lake Holland areas is indicative of the importance of the area as a whole. Both these areas will also provide families with small children the opportunities to access an easier and gentle wilderness.

On the Lower Clark Fork Geographic Area there are great opportunities for wilderness preservation and habitat connectivity. Another indicator species, the grizzly bear, is trying to expand to wildlands in the Selway Bitterroot/Clearwater River of Idaho from Cabinet Mountains. Vital Ground took it upon itself to purchase and subsequently transfer 40 acres to the Forest Service in the Cube Iron-Silcox/Cataract Roadless Area a few years ago. Their rationale was that this mere 40 acre area, if developed, would upset and severely alter the connectivity of grizzly bears across the landscape from the Cabinet Mountains to the Selway region in Idaho. For this reason, we recommend the Cube Iron-Silcox Cataract Roadless area as Wilderness. Also, opportunities for a wilderness experience abound here. Continuing on our road trip allowed us a backpack trip into Cabinet Mountains and subsequently we learned how important a collective landscape is in this area as well.

When looking at the Lolo NF Roadless Area map, the areas depicted as such are mostly isolated, have convoluted boundaries and don't occupy the majority of the Lolo NF. The 2001 Roadless Rule was a very in

depth computation, analysis and documentation of the importance and value of areas that are roadless ;whether it's wildlife habitat, water retention and filtration, open space, view sheds, wildland, etc. Now we have climatic change so there is another reason to retain ALL the 36 roadless areas on the Lolo NF as Recommended Wilderness.

The other roadless area we are familiar with is the Great Burn on the Idaho side but it borders the Hoodoo #33 on the Lolo NF. We backpacked a portion of the 738 trail in the Nez Perce/Clearwater NF. It straddled Idaho and Montana. Although our trip was toward Idaho and the Clearwater area, the entirety of the area should be recommended as Wilderness. It's quite extensive and contains habitat for the grizzlies, wolverines and mountain goats to name a few. The whole area was visually stunning. We urge Wilderness for the Hoodoo.#33.

Timber production or harvest. Our experience with Forest Service timber sales is that they are always subsidized by huge sums of public funds with no benefit for the paying public. My Congressman in the 80's, Bob Mrazek was the bane of the Alaska congressional delegation. Long story short, Bob authored the 1990 Tongass Timber Reform Act. Amongst its other provisions, it stopped the \$250,000,000 annual allocation to promote subsidized logging in that national forest. That's a \$8 billion, 250 million dollar savings since then!! And there was the logging proposal in the Kilkenny Range in the White Mountain NF that was to cost taxpayers \$160,000 for a \$52,000 return and of course the environmental destruction. By the way, Alaska Senator Ted Stevens was going to make Long Island NY a Wilderness! The White Mountain NF project dropped. So, we get a little jittery when we see the blue areas depicted on the Lolo NF Draft LMP maps.

Lands and connectivity of lands. We urge the Lolo NF to pursue an active land purchasing program to solidify the boundaries of the forest or with conservation easements as another tool to accomplish the same. The so called urban interface is a nice word for "to become urban sprawl". We don't want the Forest Service to be the keeper of someone's Trophy Home by constantly allocating public funds and resources to extinguish forest fires that might "adversely influence" this urban interface. We urge purchasing outright or conservation easements on lands within the authorized boundaries of the Lolo NF as well as connectivity lands that may be just outside the boundary of the Lolo NF. This can be coordinated with the Fish and Wildlife Service, Montana Dept. Wildlife and Parks as well as Vital Ground.

ATV, Dirt Bikes and Snowmobiles. The Forest Service should not be in the business of providing a "play ground" for every technical creation that comes to being. Usually the users of ATVs', dirt bikes and snowmobiles show up in a sensitive area, the Forest Service fails to enforce the protection of the resources in an area occupied by those users. That was not the situation in the Badger Two Medicine of the Helena/Lewis Clark NF because they nipped that problem in the BUTT. So, look west to the Nez Perce/Clearwater NF LMP where 20,000 acres of prime alpine mountain goat, grizzly bear and wolverine habitat was allocated to snowmobile use after that use was not banned. The Forest Service caved to an elitist and state of Idaho subsidized recreational activity. That area was removed from the Idaho portion of the Hoodoo/Great Burn Wilderness proposal. If you have an ATV, dirt bike or/and a snowmobile, use it on your private land. The Lolo NF or any national forest is not a race track or proving ground for those middle aged obese persons with lack of libido.

It's better to err on the side of "too much" Wilderness, if there is such a thing. There is no national need to exploit these roadless areas in the Lolo NF. When the war with China comes, and there is some important strategic mineral in a Wilderness area(s) that is needed for national defense, then pursue it. But those who oppose wilderness lack the testicular fortitude and ambition to forge their own economic security. They blame the wilderness. Wilderness does not impede economic security. And it should not be blamed as an economic impediment. It bolsters the economy of an area. Water is the most important commodity on the Lol NF, not timber, ATV trails or minerals. Wilderness is true multiple use even when it comes to one's mental being, a non Forest Service concern in the LMP.

In conclusion, we are familiar with many national forest units, especially in the southeast U.S and some of the

areas on the Lolo NF. There are many reoccurring and similar themes on these national forests, including those presented. Some national forests have more roadless areas than others for instance. So when it comes to management of the roadless areas on the Lolo NF we urge the Forest Service to recommend all as Wilderness.

Attached are pictures of our conservation easement that borders the Lynn Hollow Roadless Area on the George Washington National Forest. Lynn Hollow is a recommended Wilderness adjoining the Ramseys Draft Wilderness. We love and enjoy our National Forests!!!

Sincerely,
Cliff and Pearl Bove