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First name: Mark

Last name: Losh

Organization: Missoula Area Chamber of Commerce

Title: President & CEO

Comments: Dear Carolyn and whom it may concern,

The Missoula Area Chamber of Commerce would like to extend its gratitude for your servitude to the public through managing lands on the Lolo National Forest. The Missoula Area Chamber of Commerce represents the business community of Missoula, with over 600 business members that represent nearly every sector of commerce in the Missoula community. As you well know, the future of these lands is not just of great interest to the Missoula community, but the management of them will shape our economy, health, and quality of life as Missoula grows.

We have found the process of getting to the proposed action of the Lolo National Forest Plan Revision to be both accessible and transparent for public participation and we commend you for facilitating it carefully and professionally. Because the Missoula Area Chamber of Commerce is not an environmental organization, but its membership is grossly interested in the lands surrounding Missoula, the Missoula Area Chamber of Commerce partners with collaboratives of diverse representation, varying interests, and ecological expertise to direct the Chamber in what specific actions it should and should not support.

To that end, the Missoula Area Chamber of Commerce aligns with alternatives and recommendations proposed by the Lolo Restoration Committee in the matter of the proposed action of the Lolo National Forest Plan Revision. Additionally, the Missoula Area Chamber of Commerce has endorsed the efforts of the Blackfoot Clearwater Stewardship Project and the associated Blackfoot Clearwater Stewardship Act. This collaborative effort has brought together local businesses, outfitters and guides, ranchers and agricultural operators, and members of the Seeley Lake, Ovando, and Missoula communities to craft thoughtful, implementable recommendations for recreation area and Wilderness designation on the Seeley Lake Ranger District. The Missoula Chamber recommends that this legislation, which is actively moving through the U.S. Congress, is carefully reviewed and its recommendations are included in the creation of the preferred DEIS and FEIS alternatives. The passage of this legislation and implementation by the Lolo National Forest will positively impact Missoula County's outdoor recreation and natural resource economy.

It is important to note that the Missoula Area Chamber of Commerce is not supporting or objecting to the proposed action but is also providing the following specific feedback separate from the Lolo Restoration Committee for consideration in adopting alternatives that more align with the Missoula Area Chamber of Commerce and its members' values.

1. Forest treatments at scale to incentivize investment in infrastructure

a. Forest treatments need to be conducted at a scale that is feasible for investment by small businesses.

Treatments need to be of sufficient size that will allow small business the opportunity for growth and investment, but not of such magnitude that small business can't afford the risk and overhead costs or so to not jeopardize the chances of treatment being completed on given timelines. Treatment size can vary by treatment methodology but should be favorable for local, family-owned businesses.

b. Annual treatment schedules should maintain consistency to sustain business growth.

2. More transparency in treatment methodology

a. Treatment methodologies are rather unclear. More clarification on what methods of treatment are to be conducted should be proposed in an alternative. Ex. Mechanical vs. Non-mechanical

b. Treatment methodology should support opportunities for new and emerging markets and technologies.

3. Management flexibility in the face of a changing climate and wildfire

a. More consideration of management on "non-suitable for timber production" lands to promote and sustain recreational opportunities. Ex. Reforestation after wildfire.

b. Pivoting management priority areas as wildfire and major disturbance events alter the landscape.

4. Recreation management and planning: We recommend that this planning process engage in or set the stage for an inventory of recreation intensity and infrastructure across the Lolo. The draft assessment includes mileage of trails, existing developed recreation sites, primary recreation activities, project recreation trends, and the current recreation opportunity spectrum. The Proposed Action, however, does not reference this information and it should be incorporated into the DEIS. Having an understanding of where the highest uses of certain forms of recreation are occurring will aid in the creation of plan components that make sense for what is on the ground. In addition, given the intentions for this plan to manage our recreation needs for two or more decades to come, it is important this process evaluate and project recreation growth patterns, needs, and challenges beyond current conditions. We also highly encourage cross-jurisdictional planning and discussion with Missoula County and City public land managers, as well as other public land managers within the Lolo National Forest landscape.

5. Streamside and wetland management: Management around streams, wetlands, and riparian areas should be consistent with state and local laws and regulations to encourage more reciprocity and compliance, this is especially helpful as potential for cross-boundary projects between USFS and other ownerships continues. Guidelines consistent with the Montana Streamside Management Zone Law and Best Management Practices would aid in compliance, enforcement, consistency, and transparency.

6. Collaboration with local entities in wildfire and community risk reduction: Clear and consistent collaboration and communication with state, county, city, and other local authorities in project planning and implementation is encouraged. When considering projects that reduce wildfire risk or are in or around communities, community risk analysis and reduction decisions should be coordinated with county and state agencies in both the planning and implementation stages. A clear and consistent definition of "community" should be established with local agencies and jurisdictions to inform decisions made to implement wildfire and community risk reduction projects.