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Lolo Forest Plan Revision, Proposed Action

I am writing these comments as a longtime resident of Thompson Falls Montana who between work and recreating spends most days of the year on USFS lands. It is my intention through these comments to express my feeling on how important Lolo National Forest lands are to the local communities, not just for their enjoyment, but for their livelihoods. Areas such as ours (west zone Lolo) don't have any big population centers, National Parks, or any other large tourism attractions to sustain a recreation economy on. Timber has been and still is the biggest economic driver in our area from federal lands. A long-term stable timber program, along with a wide spectrum of recreation opportunities will help ensure the prosperity of our smaller communities well into the future.

General

FW-XXX-GO

When mentioning the parties the Lolo National Forest Collaborates with, there is no mention anywhere about county governments. County government needs to be specifically mentioned because of their connection to the local populations and interests.

Timber

FW-TIM-OJB 01

01: I would urge not to place a hard limit on Projected Timber Sale Quantity. Having a specific quantity has the potential to limit future flexibility in any unforeseen circumstances. A range of 55-75 MMBF is suggested to give flexibility and to help sustain and/or grow local processing infrastructure.

FW-TIM-GDL

02: Change the wording from "of a variety of diameters, including large and very large sizes (greater than 15 inches d.b.h.)" to a variety of diameters, representative of the area. Giving any specific diameter across the Lolo Forest with so many forest types is too broad a brush and can limit the needs of specific areas.

Soils

FW-SOIL-GDL

01: The best written statement I've seen on soil disturbance. It is clear to the point and offers site specific flexibility.

ROS

FW-ROS-DC

04/06: I offer this suggestion based on my experiences in the past 15 years of living in the Lower Clark Fork geographic area. I spend at least 15 days per winter snowmobiling/backcountry skiing and have been doing so since 2009. In those 15 years I have never come across any person snowshoeing or seen their tracks and have only come across cross country skiers four times (same couple each time), all within one mile of Prospect Creek highway. The only consistent occurrences of non-motorized recreation I have observed in the past 15 years are backcountry skiers in the upper Prospect Creek drainage which they accessed by snowmobile from Wallace

Idaho.

Since the mapping and subsequent acreages in the Proposed Action are incorrect and will not be corrected, it is impossible to offer any specific comments. Instead of offering specific comments I would offer guidelines on where ROS settings should be located. Under the current plan, most areas closed to winter motorized travel are unreachable to non-motorized access because of their distant location to plowed access. If a non-motorized user (i.e. backcountry skier and/or snowshoer) wanted to use any of these non-motorized areas, they would need motorized transportation to access it. Seems kind of counter intuitive. My suggestion is to allow motorized recreation in areas and routes away from plowed access and only on specific routes located close to plowed access. This scenario would appease both motorized and non-motorized winter recreationists as well as reduce wildlife conflicts with motorized users. An example of this scenario is attached demonstrating how this could work in Prospect Creek drainage of the Lower Clark Fork geographic area.

This example is based on my experiences in the Lower Clark Fork geographic area but should be expanded to both the Saint Regis and Middle Clark Fork geographic areas for which I have also spent many days. The Great Burn is one area that this strategy would also work well in. The Great Burn from Hoodoo Pass to Fish Lake, particularly the higher elevations should be excluded from Recommended Wilderness designation mirroring the newly signed Nez-Clearwater Forest Plan. The area provides an opportunity truly unique in the intermountain west with its vast, primitive setting allowing motorized users an experience unmatched anywhere else. The quickest way to access the area by nonmotorized means would require a hike of seven miles on the unplowed Trout Creek Road and a three mile hike to Heart Lake all though feet of snow. Suffice to say the area gets such little use by non-motorized users there would be zero user conflicts. There are more user conflicts in one day at Heart Lake in the summer with drones, music, yelling, and feeding mountain goats than would be in years of winter motorized use in the higher elevations.

4.3 MA 3 Backcountry

The areas designated as backcountry should be kept to the extent of Inventoried Roadless Areas and not include any additional areas outside the IRAs. The Desired Conditions, Standards, and Suitability language of Backcountry areas should mirror that of the roadless rule as to what is allowed or not allowed. This would allow for a clear explanation of how these areas are going to be managed.

Suitability (MA3-SUIT)

01: It states no new motorized trails will be constructed. This is not consistent with the Roadless Rule as the Roadless Rule does not disallow motorized trail construction. It is recommended "or new motorized trails" be removed from the language to show consistency between the Roadless Rule and Backcountry management strategies.

Thank you again for providing the opportunity to share my thoughts on the Proposed Action.

Sincerely,
Mike Lilly
Resident
Thompson Falls, MT