

Data Submitted (UTC 11): 3/30/2024 5:47:25 AM

First name: Rick

Last name: Shaw

Organization: Backcountry Sled Patriots

Title: Member

Comments: Lolo National Forest Plan Revision

March 29, 2024

Lolo National Forest Supervisor's Office

Attn: Amanda Milburn - Lolo Plan Revision

24 Fort Missoula Rd

Missoula, MT 59804

SM.FS.LFNRevision@usda.gov

Dear Ms. Milburn;

Thank you for this opportunity to comment on the Preliminary Draft of Revised Forest Plan for the Lolo National Forest.

I am a Montana native and have lived in our great State of Montana for all my nearly 68 years. I enjoy hunting, fishing, hiking and sightseeing in our national forests as well as our designated wilderness. We have wonderful opportunities to experience all this right out our back door. I am a very good steward of our public land and am a very conscientious user of what is available to us, always being sensitive to the environment and not causing harm in any way while enjoying our forests or wilderness.

I also enjoy over the snow recreation typically in challenging backcountry. This tests my riding ability, but more so allows me to experience backcountry for it's natural beauty, wonder and challenge. I, like other public land users enjoy the scenery, serenity and solitude. These are areas that I wouldn't normally see due to distance and difficulty of terrain. I intend to continue to experience these backcountry areas particularly in the winter as I surpass my 70th birthday and beyond. Due to advancements and technology of over the snow vehicles in recent years I can continue to enjoy the winter backcountry recreation. I do however have concerns about the Preliminary Draft of Revised Forest Plan as written and presented.

I stand firmly against any more wilderness added to the Lolo National Forest. I understand Lolo National Forest managers are bound by the 1964 Wilderness Act / Forest Service Handbook 1909.12 Chapter 70 Section 71.2, and must inventory potential wilderness area to consider. That being said, we have enough wilderness in the Lolo National Forest and in the United States. Current wilderness is used by a very small percentage of the population of the United States. Evaluating 223,919 acres as Recommended Wilderness and an additional 85 areas with 1,157,133 acres to be included in the Wilderness Inventory is unrealistic. The U.S. Forest Service must achieve a mandate of managing national forests for the greatest benefit for the greatest number of users. There is already substantial wilderness in this forest, and allowing for roads, recreation access, timber harvest and others uses is crucial to landscape health and to maximize public benefit. Within the Lolo NF there is already four designated wilderness areas and four recommended wilderness areas (RWA's) encompassing a total of 371,799 acres in the Lolo National Forest of 2,263,246 acres which is approximately 16.5% and that is sufficient wilderness if all the RWA area is included in the plan. That is potentially 371,799 acres that is closed to my preferred manner of recreation and essentially left only to foot traffic and that seems unfair and is not balanced for all users. A small percentage of the U.S. population uses wilderness or even knows what wilderness is. An even smaller percentage of those that travel by foot in the wilderness penetrate far into the interior of wilderness due to difficult terrain and distance. I seriously question whether this proposed plan is fair and it seems rather biased to one particular user group.

What is now being considered includes expanding the current wilderness and RWA's such as the Great Burn RWA which would close off access for over the snow recreation from Lolo Pass. This proposal would expand the Selway-Bitterroot Wilderness area, Sliderock Wilderness and the Bob Marshall Wilderness. Creating more wilderness restricts all forms of use. Wilderness eliminates all roads and access to entire areas of land unless by foot travel. More and more of our country will be off-limits to many American's and user groups through these designations. WE DON'T NEED MORE WILDERNESS.

A historic riding area for other over the snow recreationalists and myself is the Great Burn which was recommended as wilderness and a travel management plan that forest officials implemented in 2012 closed the area to winter motorized use, putting an end to legal use of motorized over-snow travel. Since 2012 myself and many other motorized over-snow recreationalists have been denied this wonderful winter Great Burn experience and that is wrong, especially since the area is not even designated as wilderness. Why then, do we need more wilderness that limits use by the over the snow recreation user group? More wilderness will greatly reduce backcountry riding opportunities which I am not in favor of. There is bountiful wilderness area available to those who want to enjoy wilderness within the current wilderness system.

I am not confident that us in the backcountry over the snow user group will be heard or our preferred riding areas be accessible. My father taught me to choose my battles, choose wisely and choose battles I can win. I offer this compromise to help find middle ground that may work for all parties. I have attached a couple of maps of areas that I had previously experienced riding by over the snow vehicles. Perhaps these areas in the maps provided could be classified or distributed in the Recreation Opportunity Spectrum (ROS) as winter motorized over snow. The areas shown in red borders are very small areas in the overall scope of the RWA's. See attached maps LNF.Proposed Action Map.Middle Clark Fork.Geographic Area.03.29.24 for the Middle Clark Fork Recreation Area and LNF.Proposed Action Map.Greater Missoula Geographic Area.03.29.24 for the Greater Missoula Area. These areas as noted have little or no user conflict as these areas are rugged backcountry that is difficult to access in the winter due to snow depth, difficulty of terrain and distance to reach the backcountry areas. Wildlife will not be disturbed as they will be in lower valleys to survive the winter. Mountain Goats in the Hoodoo Pass area will be in cliff areas unapproachable by over the snow vehicles thus not disturbed. Furthermore, Page 31 of the Proposed Action addresses Invasive Species (INV) then states that the 2012 Planning Rule identifies invasive species as a stressor to natural processes. Invasive species are one of the most immediate and disruptive threats to ecosystem function and integrity. It seems to me that better management of LNF resources would be to get the upper hand on invasive species before they get worse and not focus on adding more wilderness to the LNF. It also seems logical that invasive species would be more controllable by man and equipment as national forest rather than as wilderness wherein equipment or machinery can't be used as it is roadless acreage. As a recreationalist, acreage shouldn't qualify as wilderness if there is an invasive species infestation.

I am pleased to see that the Proposed Action references Sustainable Recreation and Scenery on Page 57, Section 2.2.2 and that recreation is recognized as a critical resource in the LNF due to its contributions to the local economy, its influence in connecting people to the land, its impact on public understanding of natural and cultural resources, and its role as a catalyst for public stewardship. As such, recreation is identified as a key ecosystem service of the LNF. The Forest Service strives to provide a set of recreation settings, opportunities, and benefits that are sustainable over time. Sustainable recreation is defined as the set of recreation settings and opportunities in the national forest that are ecologically, economically, and socially sustainable for present and future generations. For best effect, all aspects of recreation should include the principles of sustainability. Over the snow recreation is a huge economic driver and the sport is sustainable. Please remember this as this forest plan is developed.

There are those who believe more wilderness is needed to protect wildlife and the environment.

Fact: Over the snow recreation does not disturb wildlife. There is no wildlife in the backcountry that is used by

over the snow recreation. During the winter months wildlife is at lower elevations where sustenance is more available. In 40 plus years of riding in terrain at 6,000 to 8,500 elevation it is rare to see any wildlife other than a raven, a snowshoe hare or squirrel. It is even rarer to cut a track of any big game. I have seen wolf tracks on occasion. Over the snow recreation does not disturb wildlife and alter their quality of life. Wildlife will ignore vehicles and people in all seasons in Yellowstone Park or Glacier Park. Wildlife will rarely lift their head from grazing while vehicles travel just a few feet away. I know of no scientific studies offered as proof that over the snow recreation interferes with wildlife.

Fact: Over the snow recreation does not damage the environment. Any evidence of motorized vehicles over the snow disappears when the snow melts. On a grander scale, The United States and Montana are but a spot on the map in comparison to the scale of the earth. The proposed wilderness acres within or joining the Lolo National Forest are very insignificant on an earthly scale as well. Creating more wilderness and eliminating motorized use is not going to help the environment or slow down climate change. Wilderness advocates that want to help the environment or slow down climate change need to start with the countries that have no regard for the environment and pollute waterways, oceans, eliminate rain forests and carelessly mine precious metals. The environment focus needs to be at a much higher level, not on the local level where creating more wilderness and eliminating over the snow recreation will do nothing to help the global environment. I know of no scientific studies offered as proof that over the snow recreation interferes with our environment.

I know there is a contingent that believes that more wilderness is needed for connectivity for wildlife diversity.

Fact: Grizzly bears and wolves are migrating and expanding their territory without more wilderness for connectivity. Grizzly bears have moved out of their normal home range and have been found as far east as the Snowy Mountains near Lewistown, MT in the last couple of years. Federally protected bald eagles, golden eagles and trumpeter swans do not need more wilderness for connectivity. On March 5, 2022 a wolverine was captured on video by a tourist in Yellowstone National Park. In the last thirty days there have been three new wolverine sightings confirmed on the Oregon Coast. Since wolverines are only found in snow fields at high altitude in Canada and Glacier Park, how did the wolverine and other wolverines in Yellowstone Park that have been counted in studies as well as the Oregon wolverines locate themselves in these areas without connectivity?

I know there is a contingent that believes that over the snow recreation conflicts with other users.

Fact: In the deep backcountry that I ride in as well as my fellow recreationalists there are not other users. In forty years of riding I have not seen one cross country skier or snowshoer off the groomed trail or immediate vicinity of a groomed trail. (Trails groomed by snowmobile clubs by the way) The winter conditions are too extreme and challenging for any other use but over the snow vehicles.

My input comes from years of experience of over the snow recreation and is based on eyewitness and facts. My counterparts, and how motorized over the snow recreation is damaging to wildlife, the environment and other users is based on perception.