

Data Submitted (UTC 11): 3/30/2024 6:00:00 AM

First name: Andy

Last name: Kulla

Organization:

Title:

Comments: Please accept and acknowledge receipt of my attached comments on the Revised Lolo NF Plan Proposed Action.

Dear Ms. Milburn;

Thank you for the opportunity to comment on the Proposed Action (PA) for the revised Lolo National Forest Plan. I'd like to preface my comments with a little background on myself and why I care about the Lolo and the Rattlesnake National Recreation Area in particular.

I worked in Recreation Management on all of the ranger districts on the Lolo NF for 30 years, mostly on the Missoula RD. I was also the Weed Specialist/Program Leader on the LNF for 20 years. Among other interdisciplinary resource duties in recreation, campgrounds, Wilderness, trails, noxious weeds, cultural resources, range, minerals, historic structure restoration and cabin rentals, I managed the Rattlesnake NRA (RNRA) for 20 years and wrote the 1992 Limits of Acceptable Change based Management Direction (Amendment 16 Appendix O-4 to the 1986 Lolo NF Plan). I'm very familiar the RNRA and Wilderness history and on the ground management and background internal discussions on the purpose and intent of the RNRA designation.

I care about the Lolo and the RNRA because the RNRA is the only NRA in Region 1 and as such has the highest level of national significance in relation to the recreation resource in the Region. The RNRA history and culture is deeply engrained in the Missoula community and is a major attribute of Missoula.

In addition to the primitive undeveloped recreation resource, the RNRA also has deep cultural and

spiritual significance. It has the same spiritual value to the Missoula community that cultural significant places have to our tribal neighbors to the north have. It's Missoula's Walden Pond where people go for spiritual replenishment and mental health. During my tenure on the Lolo, we worked hard to respect local cultural values and develop personal relationships and trust with the communities across the forest. The hard goals and standards in the 1986 LNF Plan were foundational to the development and maintenance of that public trust, that and tenured forest staff that knew both the communities, on the ground resources and culture of the forest intimately. To that end we tried to put a face to an otherwise faceless bureaucracy. Unfortunately, I see the LNF losing contact with and the trust of the community as a result of continually rotating staff and impersonal public relations and now repeated attacks on the

recreational and spiritual resources in the RNRA. The PA clearly indicates that the Lolo has lost its institutional memory regarding the RNRA management history and as importantly that culture.

While I respect that the revision team is well versed and capable of cranking out cookie cutter forest plans that are compliant with the 2012 Planning Rule, the lack of connection with the people, communities and on the ground resources of the LNF has been disappointingly evident since the forest first embarked on plan revision about a year ago. While you claimed the forest staff is providing you with the on the ground information you need to make the plan specific to the LNF, the PA in the revised plan doesn't reflect that.

I appreciate that it wasn't apparent only to me how the proposed plan lacks protections for the RNRA but that the Forest Supervisor had the courage and leadership to make an unprecedented public statement on 3/26/24 commenting on comments being received on the RNRA before the comment

period ended to say the plan is lacking and not clear. I applaud Ms. Upton for that. While it may not be the Planning Team's intention, NEPA isn't founded on intentions, it needs to be written down in clear and specific language.

To help improve and clarify RNRA management in future iterations of the PA and or in the appropriate alternative for RNRA management, I offer the following comments on Ms. Upton's 3/26/24 remarks. Forest Supervisors Special Email Message March 26, 2024 regarding the RNRA commenting on comments received but before the end of the comment period

Comment: If the public is not allowed to see and comment on comments in an open Readers Room before the comment period closes, why did you comment on comments no one else could see before the close of the comment period? It looks like you are saying that either you don't like or that the comments you have received so far are wrong and that there is indeed a lot wrong with the PA in relation to the RNRA.

As the comment period draws to a close, I continue to be impressed and grateful for the hard look that you are taking on the Lolo plan revision proposed action. I have heard concerns and public dialogue related to the Rattlesnake National Recreation Area (RNRA). I am reaching out to you to clarify the intent of the proposed action direction with respect to this special and important area.

Comment: Thank you for finally giving the RNRA the attention it needs. Please follow up on that by fixing the problems, errors and omissions in the PA for the RNRA.

First, I must emphasize that it was not the intent of the proposed action to substantially change the current management of the RNRA

Comment: It may not have been your intent, but the PA does significantly change the current management of the RNRA by declaring it [idquosuitable] (Appendix 2 Table A2.3 and elsewhere in the PA) for logging, road construction and grazing in addition to dropping all the RNRA Goals and Standards in the current Forest Plan and LAC Direction.

While I am still considering the nuances of this issue, I believe that some of the concern is related to the way that the proposed action is organized to meet the intent of the 2012 rule with respect to integrated plan content.

Comment: Please don't use the 2012 Planning Rule as an excuse for poor land management. If it's a barrier that you can't overcome to producing a clear and accountable plan, wait on plan revision until you

can do a good job.

Comment: This is really important: The Process is not the product of plan revision, it[rsquo]s what[rsquo]s IN the plan and that the public can understand and support it. All you meetings are totally dominate by process and not content so far.

In the proposed action, the RNRA has its own delineation

Comment: The RNRA does not have its own Management Area or delineation in the PA. It is chopped up into three Management Areas that are less restrictive and not specific to the National Recreation Area as under current management. The Geographic Area plan components for the RNRA are even skimpier than in the MA section.

with plan components in the Greater Missoula Geographic Area section (Chapter 3).

Comment: The RNRA in the Greater Missoula Geographic Area in Chapter 3 doesn[rsquo]t even have ANY goals, Objectives, Standards or Guidelines. for the Rattlesnake NRA (PA pg 121)

In addition, management areas (Chapter 4) overlay this, as does the Forestwide desired recreation opportunity spectrum (ROS) (Chapter 2). I can appreciate that this structure of overlapping allocations is complex. To be clear, the most restrictive plan components apply when allocations overlap.

Comment: This doesn[rsquo]t make any sense. WHAT SPECIFICALLY are the most restrictive plan components for the RNRA? You must clearly state this in the revised plan and do it in a way that a reader can find and understand.

Recommendation: Say specifically WHAT these most restrictive plan components are for the RNRA in clear language somewhere in the revised plan.

The team and I are taking a harder look at all plan content relevant to the RNRA to ensure that the management guidance is clear and fully supportive of the law that established this area (Public Law 96- 476, Rattlesnake National Recreation Area and Wilderness Act of 1980).

Comment: You and the team also need to take a harder look at the current management goals and standards, LAC Direction, management history and designation intent. If you want to change any management in the RNRA, state specifically what is wrong or broken in the current management and why you can't resolve it with the current and past RNRA management methods.

I have also heard concern that 1986 Appendix O4 and the Rattlesnake National Recreation Area and Wilderness Limits of Acceptable Change Management Direction (1992) were not included in the proposed action, indicating that this guidance is being removed. Again, this was not the intent

Comment: Appendix O-4 was in 1992, not 1986.

Comment: The RNRA LAC Direction is not included anywhere in the Proposed Action and correct me if I'm wrong, was only recently added to the online document library. If the RNRA LAC Direction is not found in the Proposed Action then it is not included in the PA.

The revised plan provides broad, overarching guidance

Comment: You need a Forest Plan that tells the public, current and future land managers what will and will not be allowed and done on the LNF. Vague, broad over reaching guidance is too squishy to keep the rapidly rotating FS Line Officers from asserting the plan means whatever they want it to mean. If the 2012 Planning Rule doesn't let you make a clear and meaningful plan, then it is inadequate and you should defer plan revision until you have a planning rule that results in meaningful and accountable management on the LNF. The Process is not the product of plan revision, it's what's IN the plan and that the public can understand and support it. So far all the revision meetings are have been dominated by process rather than meaningful discussion of content.

Specific management plans, such as the RNRA and Wilderness Limits of Acceptable Change Management Direction, are not part of the plan itself However, they will be recognized in the revised plan and continue to be used appropriately to guide management of this special place.

Comment: The 1992 RNRA LAC based Management Direction is not recognized or even mentioned anywhere in the PA.

Comment: What are the other [ldquo]specific management plans[rdquo] you are referring to that will be recognized in the revised plan and continue to be used appropriately[rdquo] but that are not mentioned anywhere in the PA? How can the public know what you are referring to if they are not mentioned in the PA?

Lastly, there is a connection with the issues I addressed in my previous leader[rsquo]s message with respect to the mapping of desired recreation opportunity spectrum (ROS). The proposed action ROS shows a semi-primitive motorized corridor along a closed, administrative use-only route. The proposed action did not intend to indicate this corridor as open to motorized use.

Comment: The ROS map for the main corridor of the RNRA says [ldquo]Semi Primitive Motorized[rdquo]. To say [ldquo]motorized[rdquo] and then say in your message it is not open to motorized use is contradictory and sounds like double talk.

Recommendation: If it isn[rsquo]t [ldquo]motorized" then don[rsquo]t have it in a [ldquo]motorized[rdquo] ROS category.

I look forward to reading your comments and working with the team to improve the clarity of plan content for the RNRA. I am carefully evaluating all the information to consider how best to ensure that the RNRA is managed appropriately and that the plan is organized in a clear way. As I have previously stated, I am committed to ongoing and meaningful engagements throughout this process.

Comment: Thank you for pledging to carefully evaluate all the problems with RNRA management in the PA. Please make sure subsequent versions fully disclose the history and cultural of the RNA designation, honor the intent of the designation (to prevent roading and logging in the Rattlesnake drainage) and have safeguards to protect and manage the RNRA as it has been for the last 44 years and into the future for the primitive undeveloped recreation resource and setting by assigning the RNRA its own MA with clear, accountable and specific Desired Conditions, Goals, Objectives, Standards, Guidelines and a Suitability statement that says it is unsuitable for any kind of commercial logging and road building.

Comment: To [ldquo]best to ensure that the RNRA is managed appropriately[rdquo] all you have to do is leave the current management in place and provide future safeguards. To repair the damage done to the Lolo by the proposed for the NRA just leave it alone, do nothing: Keep the current management with future safeguards. Easy solution. [ldquo]If it ain[rsquo]t broke, don[rsquo]t fix it.[rdquo]

BACKGROUND

In the 1970s, when the entire Rattlesnake drainage was checkerboard ownership between the Forest Service and Montana Power Company (MPC), MPC began logging and roading their lands in the drainage, as is still visible today in the lower Lake Creek and Wrangle creek drainages. This caused great alarm in the community and led to the formation and development of a citizen's initiative and Rattlesnake advocacy group, the Friends of the Rattlesnake. The effort to prevent logging and road

building in the Rattlesnake drainage garnered widespread public and political support. The citizens' initiative along with congressional and presidential support put in place lasting protection for the NRA and Wilderness under the Rattlesnake Act of 1980. That Act designated the current National Recreation Area and Wilderness. The Act also directed the LNF to acquire all the MPC lands inside the new NRA and Wilderness boundary. In 1983 the LNF acquired approximately 21,000 acres of MPC lands to make it the ownership pattern we know and love today.

The 9/17/80 Congressional Committee notes for the Act stated: [ldquo]Due to its high watershed values, the proposed NRA is unsuitable for livestock grazing, timber harvest, mining and other resource development[hellip] and that the area possess outstanding wildlife habitat, opportunities for primitive recreation and scientific and educational resources.[rdquo]

Throughout the Need for Change and PA, there is no mention or recognition of the fact that the NRA and Wilderness were designated specifically to stop commercial logging and road construction in the Rattlesnake drainage. (or [ldquo]suitable for timber production or timber harvest for other multiple use purposed[rdquo] as stated in the Jan 2024 PA). As there were numerous opportunities and sections in the PA to say this, the repeated omissions clearly suggest that it is intentional in order to advocate for logging and road building in the RNRA. The brevity and lack of factual history also renders the discussion of the RNRA in the revision documents untruthful by omission.

The intent of the RNRA designation has been honored for the last 44 years and is embedded in the standards and guidelines in the 1986 LNF Plan, the 1992 Limits of Acceptable Change (LAC) based Management Direction for the Rattlesnake NRA and Wilderness, and in practice. During my tenure as RNRA manager I was privy for 20 years to all and any discussions about vegetation management and there was never been any doubt that it would be managed for primitive recreation and with a lighter management footprint, in respect for the reason it was designated. The treatment of the RNRA in the PA represents a 180 degree about face in management of the RNRA by opening up the NRA to commercial timber harvest, log hauling, new road construction, road reconstruction (presumably for timber harvest), temporary road construction, and removal of the specific RNRA standards in the [rsquo]86 LNF Plan and LAC Direction. Furthermore, sending logging trucks through the residential neighborhoods of the Rattlesnake would not only cause further congestion on a narrow two-lane road, but would endanger pedestrians, joggers and bicyclists heading up to the RNRA from the city and University.

The Lolo NF and especially the Missoula Ranger District is all about recreation. The PA in relation to the RNRA significantly degrades the recreation resource, not only as demonstrated in the plans for the RNRA but the fact there has not even been a dedicated recreation specialist on the revision team let alone one that has any knowledge of the on the ground recreation resource or recreation culture of Missoula. The bias against the RNRA and recreation resource and commitment to the belief that there is no forest

vegetation problem that can[rsquo]t be solved by logging, is further reinforced by having a timber person as the revision team leader. I don[rsquo]t mean to disrespect or criticize that person[rsquo]s abilities in their specialty

area, but on a forest where recreation is as important on the Lolo, why wasn't a recreation specialist

selected to lead the revision effort? The devaluation of the recreation resource in relation to the RNRA is further reinforced by the presence of a Missoula District Ranger with no formal recreation training or professional recreation management experience and the absence of a full time Missoula District Resource Assistant whose job is to manage and speak up for recreation and the RNRA both on the ground and in plan revision. This is a stacked deck with clear bias against the recreation resource and to support logging the RNRA for any one of a number of non-recreation resource reasons. Again and again, the recreation resource is treated as a secondary or tertiary byproduct of the number one Forest Service priority: logging. I understand and support that timber harvest and new road construction and

reconstruction has a place in National Forest management, but the RNRA is not the place to use industrial commercial logging and road construction under the false premise that you are in anyway enhancing the recreation resource. If there is any place in the Northern Region where recreation should be the number one driving resource, it is the RNRA. As a professional recreation manager on the Lolo NF for 30 years, I know from experience that logging definitely does not improve National Forest recreation, and to suggest it does is a discredit to the Forest Service and reflects a huge

disconnect with Missoula community.

Throughout the history of the RNRA, in both the legislation and management, recreation has been the dominant and driving resource. The RNRA was originally designated to be managed as a transition zone between Wilderness and general recreation areas like Pattee Canyon and Blue Mountain. It was designated to be managed with a lighter hand, with respect for the those who fought hard to get it designated and as a nationally exceptional recreation resource. Rather than log the RNRA, the LNF could use this as an opportunity to be progressive, creative, innovative and demonstrate new light on the land vegetation management methods and tools. The Missoula Valley has an incredible brain trust and an abundance of dedicated and interested publics and researchers to help make this happen.

The Marshall Woods project in 2015, after another attempt to log and road the RNRA, instead demonstrated a better approach. It complied with the RNRA designation intent by using non-

commercial, methods and prescribed fire to treat fuels and timber stands and that work has been called a success by the LNF staff. According to Missoula District Ranger Crystal Stonesifer (Missoulian 1/26/23) [Idquo]the [Idquo]Blue Mtn Upkeep[rddquo] (logging) project will also [Idquo]repeat best practices from similar work done in the Rattlesnake and Marshall canyons on Missoula's north fringe. Operating with hand crews instead of heavy machinery and was one feature that got good public response.[rdquo] You can and have done the kind of vegetation management that will protect the primitive recreation resource and setting. Please continue to protect recreation in the RNRA by continuing to do so.

General RNRA Comments

Unfortunately, the PA needs a little more than a nudge to fix it and make right for the recreation resource in the RNRA and the Missoula community. It needs a good poke with a sharp stick. So please excuse my candor and bluntness in the following comments. Many of my comments may grow redundant and are repeated in many

places. That's because the errors, omissions and mismanagement statements for the RNRA are repeated throughout the PA. I'm sure I missed some of these but did my best to decipher a

weird and totally confusing plan format.

The PA, while putting Wilderness, the only other Congressionally designated area on the forest, in its own Management Area as was done in the 1986 LNF Plan, does not have a special Management Area for the RNRA. By doing the PA fails to recognize the national and local significance of the RNRA. This is a 180 degree departure from current management in the 1986 LNF Plan. The PA further diminishes the significance and importance of the RNRA by washing its management in with other non-designated recreation areas, ski areas and bicycling trails on the forest. The RNRA is not just another tourist or roadside attraction like the Milwaukee RR R/W / Hiawatha Trail or LNF ski areas. It should not be in MA5 (or MA's 3 or 4). It is not like Blue Mtn or Pattee Canyon, which are de facto city parks and don't have Congressional designation.

At a time when there is rapidly increasing recreation use, increasing population in the Missoula valley, increasing human recreation impact and increasing impacts of climate change on the RNRA and all NF lands, the standards to protect and manage the RNRA need to be MORE specific and stringent, not less specific, generalized and vague.

The PA was presented as a "starting point", that would mean starting from the current management, not from before the Rattlesnake Act of 1980 when the RNRA was open to logging and road construction as is done in the PA. As a bare minimum the "starting point" in the PA should be management under the Goals and Standards in the 1986 LNF Plan, Amendments 1,3, 5 and 16 to the 1986 LNF Plan and the standards in the 1992 LAC Direction for the RNRA.

There is also an inconsistency and confusion in the PA for the "south zone" of the RNRA. The PA refers to a "south zone" but doesn't say whether it is the same "south zone" identified in Lolo Forest Order F16-001-Lolo-D3 dated 1/25/15. Furthermore, the acres other than those in the "south zone" are unaccounted for as part of the RNRA in the PA and not mentioned at all in either MA 3 or 4, both of which include RNRA acreage.

There is no acknowledgement of the RNRA throughout the PA when "designated areas" are mentioned and no apparent awareness of the historical background of the Rattlesnake Wilderness and NRA and its cultural role in the Missoula community. These omissions diminish and downplay:

1. the significance of the RNRA, as a Congressionally designated area,
2. that the NRA is the only NRA on the Forest and in Region 1
3. its history and purpose of designation,

Disregard for the recreation resource in the RNRA is further supported by:

1.
 1. the absence of RNRA specific Goals, Objectives, Standards and Guidelines in the Missoula Geographic Area section,
 2. the change under the PA that the NRA would be "suitable" for road construction and logging (Ch 3

pg 121) for any reason you chose, and

1.

1. the lack of Goals and Objectives and Standards in the Management Area section (Ch 4 MA 3,4,5) of the PA

Again, these omissions are so many that I can only conclude that the devaluation and diminishing the value and importance of the recreation resource in the RNRA was intentional to support the primary objective in the PA: logging and building roads in the RNRA.

In summary, the RNRA is the ONLY NRA in Region One. The PA significantly diminishes its national significance as the only Congressionally recognized and thereby most significant recreation area in the Region by denying it a Management Area like the other congressionally designated area on the Forest (Wilderness) as was done in the 1986 LNF Plan and as was done in the 2006 [ldquo]false start[rdquo] LNF Plan revision. The PA also strips the RNRA of its specific and protective Guidelines and Standards, Forest Plan Amendments and Limit of Acceptable Change Direction and designates it suitable timber harvest and new road construction in disregard for the reason it was designated as an NRA in the first place. The PA represents a radical 180-degree change in management for the Rattlesnake NRA

The RNRA should be assigned its own MA not only for its unique character and history, but because it is only one of two Congressionally designated area on the LNF, the other being Wilderness, which has its own MA. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and it should clearly state that the RNRA is closed to commercial tree removal, new road construction, existing road reconstruction and will be managed in perpetuity, as was the intent of Congress in 1980, for primitive recreation and where the preservation and enhancement of the recreation resource is the number one management objective. Additional protective provisions should be added to the PA so we don[rsquo]t have to go through this same issue over and over again where some new FS manager comes in with the great idea to log the RNRA, since this is not the Lolo NF[rsquo]s first try at upending the RNRA management in the last 10 years.

Specific Document Comments

1/21/24 Scoping Letter

Scoping Letter: [ldquo]My vision for the proposed action is that: 1) it responds to the Preliminary Need to Change; 2) it modernizes the 1986 Plan[rdquo]

Comment: The PA does not respond to the Preliminary Need to Change for the RNRA because The Need for Change does not say anything in the RNRA needs to change and doesn[rsquo]t even mention the RNRA, although it mentions other designated area, like Wilderness (at pg 17 3.4.6.). And yet the proposed change in the NRA is 180 degrees (open to logging, road construction, etc, see below) from the present management. The generalized mentions of [ldquo]recreation[rdquo] in the Need for Change are so vague that they can be interpreted however you want.

Scoping Letter: [ldquo]The proposed action is a launching point - an initial step in the process anchored to information that is currently available to me.[rdquo]

Comment: The planning team has repeatedly said the PA is just a starting point. A starting point would be from now or the current condition. But the PA for the NRA starts from the mid 1970[s] when the Rattlesnake drainage was all open to logging and road construction by proposing to open up the RNRA

to logging, road construction, reconstruction, etc, and eliminating all the current standards in the 86 LNF Plan, LNF Plan Amendments and the 1992 RNRAW LAC Direction.

Scoping Letter: [d]The action that is proposed is to revise the 1986 Forest Plan.[d]

Comment: the PA does not revise the 1986 Forest Plan for the RNRA, it eliminates it and starts with a proposal for the Rattlesnake drainage like it was before the 1986 LNF Plan and before the NRA was

designated in the 1980 Rattlesnake Act, a time when the drainage was open to logging and road building and had no recreation standards at all.

Appendix A / Preliminary Issues

Issue 2: [d]Opportunities (suitability) for mountain bikes or ebikes and other uses[d]

Comment: ebikes are motorcycles: a [d]cycle[d] with a motor, why don[rs]t you refer to them as motorcycles since they are a motorized cycle? Referring to an e bike as anything other than a motorcycle is misleading.

Recommendation: Rather than [d]ebikes[d] simply say [d]motorcycles including e-bikes[d].

Issue 2: [d]The extent and location for the Concentrated Recreation Use management area.[d]

Comment: This issue is unclear and confusing. What does this mean? What specifically is at issue? As written, this issue is too vague doesn[rs]t say anything.

Recommendation: Reword to more clearly say exactly what (how and where) the [d]extent and location for concentrated recreation is.

Jan 2024 Need for Change

Comment: there is no stated Need for Change in the RNRA anywhere in the [d]Need for Change[d] and yet the Proposed Action describes a radical 180-degree change in management in the NRA and completely discards any of the Management Direction in Appendix O-2 of the 1986 LNF Plan (LAC Based

Management Direction Rattlesnake National Recreation Area and Wilderness Dec 1992), without saying what is wrong with it (Need for Change). The generalize mentions of [d]recreation[d] in the Need for Change are so vague that they can be interpreted however you want.

Recommendation: Clearly state why you need to change current management of the RNRA back to pre- 1980 conditions and why you need to log it, build new and temporary roads and reconstruct temporary roads, open it to grazing (MA3 and 4), personal use firewood cutting, and eliminate the Goals and

Standards in the 1986 FP, Amendments to that Plan, and the LAC Direction.

Jan 2024 Proposed Action

In the beginning of the PA, you have several paragraphs saying how accessible you want the document to be and how you want to accommodate everyone with any ability or challenge to review and comment:

[ldquo]We make every effort to create documents that are accessible to individuals of all abilities;[hellip].. however, limitations with our word processing programs may prevent some parts of this document from being

readable by computer-assisted reading devices. [hellip][hellip]Remedies and complaint filing deadlines vary by program or incident. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible agency [hellip][hellip] [ldquo]

Comment: I contacted the revision team to request a hard copy because I [ldquo]needed assistance with any part of this document[rdquo]. I was told you were prohibited from giving or selling me a hard copy because you needed to save paper and because if you gave me a copy, you[rsquo]d have to give one to everyone.

Your response contradicts the statement that you will make every effort to make the document

accessible to everyone with every ability and challenge. You said I could come into the office or a to look at a hard copy but that wouldn[rsquo]t allow me to tab, highlight, make notes, or cross reference anything in

the documents. Not to mention how many days I[rsquo]d need to come into your office to decipher and try to make sense of the PA. Due to the digital only format, I[rsquo]ve had to work on these comments for weeks.

Hanging out in your office for that long is not reasonable or desirable, and even if I did, I would have marked up your [ldquo]public copy[rdquo] and you[rsquo]d probably give me a ticket or arrest me for defacing public property. The PA, Need for Change and appendices are hard enough to understand in any form, hard copies on request doesn[rsquo]t seem like too high a bar to encourage public engagement, review and

comment. Somehow the 1986 Plan was printed and available to everyone and that wasn[rsquo]t a problem. As was every EA and EIS I wrote for the Lolo up to 2011 when I retired. There is no shortage of paper and paper is recyclable. Furthermore, if I got or bought a copy you would not have to [ldquo]give one to everyone[rdquo], you only have to give them to those who, based on their ability and challenge, ASK for one. Everyone would not ask for one. Your excuses clearly demonstrated that you don[rsquo]t [ldquo]make every effort to create documents that are accessible to individuals of all abilities[rdquo] as is clearly stated in the beginning of the PA.

Your refusal for a hard copy and insistence on only digital review went over the top when I asked why all the Amendments to the 1986 plan weren[rsquo]t on the website. When I started to review, I figured it might be helpful to compare the PA to the 1986 Forest Plan but found you didn[rsquo]t even have all the 1986 Plan Amendments on your web site. So after I told you I was digitally impaired, when I asked you posted

1,836 pages of Amendments with NO INDEX, SUMMARY OR TABLE OF CONTENTS! You KNEW I was digitally impaired. Please explain how in the world that prank encouraged public participation or my or anyone else[rsquo]s review. Did anyone on the revision team even LOOK at the 1,836 pages of Amendments? After that I had no choice but to elevate the issue and file a [ldquo]discrimination complaint[rdquo] with the [ldquo]Office of the Assistant Secretary for Civil Rights[rdquo]. It[rsquo]s an unbelievable waste of time and money that something as simple as a request for ONE hard copy has to go all the way to the Washington DC office of the FS for resolution. How in the world do you expect the average citizen to review and comment on the hundreds of pages in the PA, all the maps and thousands of pages of Amendments, even if they are not digitally

impaired?

Recommendation: Make hard copies available only to those whose abilities to read, navigate and digest digital document are impaired and who ASK for a copy. Don't think or suggest you'd have to give a hard copy to everyone. When I worked for the FS we provided digital copies, online access and gave a hard copy to anyone who asked for one. What has changed since then 2011?

PA pg 7 Forestwide Social and Economic Roles and Contributions

Comment: You didn't mention / omitted the history of the only NRA found in the Northern Region, why and how its designation came about and the present cultural and identity role the RNRA plays in the Missoula community.

Recommendation: add to Forestwide Social and Economic Roles and Contributions [In the 1970s, when the entire Rattlesnake drainage was checkerboard ownership between the Forest Service and Montana Power Company (MPC), MPC began logging and roading their lands in the drainage, as is still visible today in the lower Lake Creek and Wrangle creek drainages. This caused great alarm in the public and led to the formation and development of a citizen's initiative and Rattlesnake advocacy group (Friends of the Rattlesnake). The effort to prevent logging and road building in the Rattlesnake drainage garnered widespread public and political support. The citizens' initiative along with congressional and presidential support then put in place lasting protection for the NRA and Wilderness under the Rattlesnake Act of 1980. That Act designated the current National Recreation Area and Wilderness.

Today the RNRA and Wilderness are a major destination and an important cultural and identity feature of the Missoula community and plays a major role in life in the Missoula Valley and beyond.

PA pg 69: Public information, interpretation, and education (PUB) Desired Conditions

Recommendation: Add [As directed in the Rattlesnake Act of 1980 the RNA will be used for ecological and educational purposes consistent with the standards in the 1986 Plan which are incorporated into the PA.

Primitive recreation and maintenance of primitive recreation settings will be the primary

management objective.

PA pg 96 Desired Conditions (FW-INF-DC)

Recommendation: Add Desired Condition 12 to read [There is no new road construction, reconstruction of existing roads or construction of temporary roads in the RNRA].

PA Pg 100 GRAZING

Desired Conditions (FW-GRAZ-DC)

Comment: There is currently no grazing permitted in the RNRA and the MA 3 lands the PA has in the RNRA are steep, thickly forested and unsuitable for grazing. The MA 4 lands are all creek bottoms and include riparian and are similarly unsuitable and high risk for resource damage.

Recommendation: Take the portion of the RNRA that is in MA 3 in the PA out of MA 3 and put it in a new MA 6. Do the same for the RNRA MA 4. Add Desired Condition to read [The RNRA is closed to domestic livestock grazing.] The PA currently says (Table A2.3) that grazing is allowed in the MA 3 and 4 portion of the RNRA.

PA pg 113 Other Designated Areas

Comment: While Wilderness and recommended Wilderness are mentioned in this section as having their own Management Areas, the RNRA is not only not mentioned but also not given its own

Management Area even though it is a Designated Area with the same level and importance (the Rattlesnake Act of 1980) as Wilderness.

Recommendation: State that the RNRA is also a Designated Area and give it its own Management Area same as Wilderness... why WOULD you do this if not to again intentionally diminish and downplay the significance and protections owed to the RNRA?

PA pg 117 Missoula Geographic Area

Comment: there is no mention or even the words "Rattlesnake National Recreation Area" in the GA

introduction even though it is the only Congressionally designated NRA on the Forest and in the region and the most nationally significant recreation feature of not only the GA but the entire Missoula Valley

Comment: Under the heading "Cultural and Historical Roles and Contributions" there is no mention at all of the history and purpose of the NRA designation: to prevent road building and logging in the RNRA.

These omissions are obvious attempts to devalue and diminish the value of the RNRA to support the building roads and logging in the RNRA.

Recommendation: Give the NRA its due, clearly state the history and purpose of designation (to prevent road construction and logging) and identify it as the most nationally significant recreation resource on

the Forest and in the Region by virtue of its Congressional and Presidential designation.

PA pg 118: Social and Economic Roles and Contributions:

Comment: While the social and economic contribution of the RNRA is significant, again there is no mention at all of the RNRA. This section says "The proximity of Rattlesnake Wilderness to urban communities is unique," that is a vast understatement, the proximity of Wilderness areas to urban areas is not unique the NFS system. But the proximity of the RNRA to the Missoula urban community is very unique, not only because of its proximity but because it is the only Congressionally designated recreation area on the Forest and in the Region.

Recommendation: Clearly state the value and social and economic role and contribution of the RNRA to the Missoula community and Missoula Geographic area. Include its primitive recreation character,

current 86 Plan and 92 LAC standards and the reason it was designated. PA 118 3.2.3 Other Designated Area

Comment: there are two designated areas in the Missoula GA. You mention Wilderness in the text but omit the RNRA.

Recommendation: State there are TWO Designated Areas in the Missoula GA: Wilderness and the RNRA.

PA pg 119 Table 32: says NRA is 60,030 acres

Comment the RNRA is not 60,030 acres, it's approx. 28,000 acres. It is not clear why the PA doesn't mention or refer to the RNRA as a Congressionally designated area (like it does for Wilderness), the only NRA in

Region One or state the RNRA acreage anywhere.

Recommendation: State the RNRA is a Congressionally designated area like Wilderness, state and

differentiate between the RNRA acreage, the Rattlesnake Wilderness acreage and the combined total.

PA Pg 120 Table 36[mdash]Lands suitable for timber production and timber harvest in the Greater Missoula GA

Recommendation: Deduct the RNRA acres (approximately 28,000) from 83,480 acres called [ldquo]unsuitable for timber production; harvest can occur[rdquo]

PA Pg 121: 3.2.9 Plan Components: RNRA:

PA text: Rattlesnake National Recreation Area (NRA) Established in 1980, the Rattlesnake National

Recreation Area (NRA) protects roughly 60,000 acres of the Rattlesnake drainage. When Congress passed the bill to establish the Rattlesnake NRA and Wilderness in 1980, over a third of the area was privately owned. The Forest Service acquired over 21,000 of these acres in 1983. Due to its proximity to Missoula, the NRA is heavily used. More than 73 miles of multiple use trails are open to hikers, horseback riders, mountain bikers, runners, cross-country skiers, and dog walkers. This area is also included in MA5, Concentrated Recreation Use.

Comment: The [ldquo]protects roughly 60,000 acres[rdquo] is confusing and misleading. The RNRA is not 60,000 acres.

Recommendation: State the actual acres in the RNRA (it is approximately 28,000 acres) and differentiate between the Wilderness acres and the RNRA acres.

Comment: The purpose of the designation and importance of the RNRA to the community is not mentioned.

Recommendation: Include the history of the designation and why it was originally designated: to prevent logging and road building in the Rattlesnake drainage. Insert the language above on top of page 2 of these comments beginning with [ldquo]In the 1970[rsquo]s, when the entire Rattlesnake drainage was

checkerboard[hellip][rdquo]

Pg 121 Desired Conditions (GM-NRA-DC)

Text: 01 The Rattlesnake NRA provides public outdoor recreation benefits and conservation of scenic, scientific, historic, and other values contributing to public enjoyment.

Comment: This is not a desired condition; it is the present condition. There is nothing to be [ldquo]desired[rdquo] with these trailheads.

Comment: Edit Text 01 to read: [ldquo]The Rattlesnake NRA provides public outdoor recreation benefits and conservation of scenic, scientific, historic, and other values contributing to primitive public recreation and primitive recreation settings.

Text: 02 Access to the area is provided by the main trailhead at the southwest boundary, as well as from the Grant Creek, Sawmill Gulch, Woods Gulch, and Sheep Mountain trailheads.

Comment: This is not a desired condition; it is the present condition. There is nothing to be [ldquo]desired[rdquo] with these trailheads.

Text: 03 Management, utilization, and disposal of natural resources promote, are compatible with, and do not significantly impair the purpose for which the Rattlesnake NRA was established.

Comment: This statement does not state the purpose for which the RNRA was established: to prevent logging and road building in the Rattlesnake drainage.

Recommendation: Add the purpose for which the RNRA was established: to prevent logging and road building in the Rattlesnake drainage.

Text: 04 Conflicts between resources are resolved in favor of the purposes for which the Rattlesnake NRA was established.

Comment: Again, the purpose the RNRA was established is not included. Managers cannot know

specifically what the Desired Condition is. State the purpose the RNRA was established: to prevent logging and road building in the Rattlesnake drainage.

Recommendation: Add the purpose for which the RNRA was established: to prevent logging and road building in the Rattlesnake drainage.

Recommended Additions to Desired Conditions in the PA for ALL OF THE RNRA, not just the [ldquo]south zone[rdquo]:

Tree removal is limited and is only that required to eliminate direct recreation safety hazards or permit construction or expansion of existing facilities. The management area is classified as unsuitable for

timber production and commercial logging is not permitted

Areas are evaluated periodically for significant insect and disease problems such as mountain pine

beetle. Buildups of insects and most disease agents do not normally pose threats to adjacent lands and effects of these are accepted as naturally occurring phenomena. Tree cutting or killing deemed

necessary is accomplished by hand work, use of horses or traditional skills and tools and use of prescribed fire.

Prescribed burning is used to improve big game forage and reduce hazards. Suppression activities generally utilize and prioritize hand tools rather than heavy equipment. Heavy equipment for fire suppression is permitted only when there is a direct and eminent threat to adjacent homes and/or human life. Impacts from use of heavy equipment for fire suppression is promptly naturalized, revegetated and weed treatment are applied until native and desirable vegetation is dominant.

Noxious weeds treatments are prioritized to restore and maintain a natural, relatively weed free setting.

The Scenic Integrity is High, with emphasis on maintaining the current undeveloped, unmechanized and historic setting

The existing roads are maintained to their present standards with maintenance emphasis on reducing mud holes and improving drainage. There is no new road construction or reconstruction of roads for logging traffic.

The Homestead Meadows are treated by burning, hand-piling, and/or cutting to remove invading trees and noxious weeds to retain the typical cleared homestead appearance.

Wintering big game are not put at risk from dogs. Dogs are excluded during times of the year when they would

stress wintering big game.

Comment: There are no measurable standards or Desired Condition for the current Limits of Acceptable Change included in the PA for the RNRA. Therefore, under the PA, there are no standards for things like trail and road conditions or maintenance, groups size, trail encounters, camp site density or campsites

condition. So, under the PA there isn't any way to measure and manage for these factors in the RNRA. Absent these standards/desired conditions/Limits of Acceptable Change, trails and roads could increase in size and number and deteriorate in condition, campsites would deteriorate and increase in numbers, groups of 20-30-40 or more hikers, mtn bikers or horseback riders could dominate trails. ROS categories don't include any measurable/quantifiable standards.

Recommended additions to Desired Condition for ALL OF THE RNRA, not just the "south zone": Trails and roads meet the Limits of Acceptable Change standards in the 1992 Limits of Acceptable Change based Management Direction for the Rattlesnake National Recreation Area and Wilderness.

Group size and trail encounters meet the Limits of Acceptable Change standards in the 1992 Limits of Acceptable Change based Management Direction for the Rattlesnake National Recreation Area and Wilderness.

Campsites encounters, campsites density and campsites condition meet the Limits of Acceptable Change standards in the 1992 Limits of Acceptable Change based Management Direction for the Rattlesnake National Recreation Area and Wilderness.

PA Pg 121: OMISSION

Comment: Why are there no Goals, Objectives, Standards or Guidelines for the RNRA?

Recommendation: Add these to include the standards in the 1986 LNF Plan and the 1992 Limits of Acceptable Change based Management Direction, and that the RNRA is closed to grazing, road construction and reconstruction, construction of temporary roads and commercial logging.

Add that 3.2.9 Plan Components: Rattlesnake National Recreation Area (NRA) the NRA will be managed with a lighter hand and as a field laboratory to try new, innovative and citizen involved management, as has been done successfully and well received by the public in the Marshall Woods project. Other national forests in the United States give chainsaw training, to the same safety standards and certification as Forest Service chainsaw operators, to volunteer groups wanting to help do non industrial thinning of smaller diameter trees. In a community like Missoula there is a rich and generous public resource available to the Lolo NF. Help build ownership in Lolo NF management.

PA Pg 121 Suitability (GM-NRA-SUIT) 01

Comment: How can you take the only NRA in the region and say that the only thing it's suitable for logging in complete conflict with the Rattlesnake Act and the purpose of the NRA designation. The reasons you stated for logging it are all inclusive and include any and all reasons to log. There is no protection for the primitive setting and primitive recreation value.

Recommendation: State that: the NRA is closed to road building, road reconstruction, temporary roads and commercial logging. State that the NRA IS suitable for solitude, primitive recreation in a primitive setting where industrial logging practices, heavy equipment soil impacts and heavy handed

management impacts are not evident, as was the intent of the Rattlesnake Act of 1980. State that the NRA is suitable for non-commercial, non-industrial traditional vegetation manipulation using traditional skills such as but not limited to horse logging, hand tree removal, piling and burning, prescribed fire and non-industrial fuels

management research.

Pg 157 4.3 MA 3 Backcountry

Comment: While a lot of the RNRA is shown to be in MA 3 on Map GM 01, there is no mention of the

RNRA or acres in the MA 3 section. None of the RNRA should not be in MA 3. Congress designated it as one unit, it has been managed that way for 44 years and was in the 86 LNF Plan. If you feel compelled to have fewer than the 28 MA[rsquo]s in the 86 LNF Plan, six MAs (with a unique MA6 for the RNRA) is still a lot less than the 28 MAs in the 86 Plan.

Recommendation: The RNRA should be assigned its own MA not only for its unique character and history, but because it is only one of two Congressionally designated area on the LNF, the other being Wilderness, which has its own MA. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and it should clearly state that the RNRA is closed to commercial tree removal, new road construction, existing road reconstruction and will be managed in perpetuity, as was the intent of Congress in 1980, for primitive recreation and where the preservation and enhancement of the recreation resource is the number one management objective.

PA Pg 158 Suitability (MA3-SUIT)

Comment: Item 02: The backcountry area of the RNRA, consistent with the purpose of its designation, the 9/17/80 Congressional Committee notes for the Act and the Rattlesnake Act emphasis on primitive settings and recreation should not be suitable for timber harvest for other multiple use purposes.

Comment: The RNRA should have its own MA and should not be in MA 3,4, or 5 at all for the same reasons as above.

PA Pg 159 4.4 MA 4 General Forest

Comment: There is no mention of the RNRA or acres in the MA 4 section. None of the RNRA should not be in MA 4. Congress designated it as one unit, it has been managed that way for 44 years and was in

the 86 LNF Plan. If you feel compelled to have fewer than the 28 MA[rsquo]s in the 86 LNF Plan, 6, (with a unique MA for the RNRA) is still a lot less than the 28 MAs in the 86 Plan.

Recommendation: The RNRA should be assigned its own MA not only for its unique character and history, but because it is only one of two Congressionally designated area on the LNF, the other being Wilderness, which has its own MA. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and it should clearly state that the RNRA is closed to commercial tree removal, new road construction, existing road reconstruction and will be managed in perpetuity, as was the intent of Congress in 1980, for primitive recreation and where the preservation and enhancement of the recreation resource is the number one management objective.

Pg 160 RNRA in MA 5

Pg 160 Table 2

Comment:

1. There is a mention of where the Rattlesnake National Recreation Area [ldquo]South Zone[rdquo] is in relation to the [ldquo]South Zone[rdquo] map referenced in Lolo Forest Order F16-001-Lolo-D3 dated 1/25/15 and

whether it is the same 15,168 acres.

1. The Lolo Forest Order F16-001-Lolo-D3 dated 1/25/15 [ldquo]south zone[rdquo] map is also missing from any of the appendix material.
2. The remaining acres (outside the [ldquo]south zone[rdquo]) in the RNRA are unaccounted for and not mentioned as being in the RNRA in the other two RNRA MA[rsquo]s (MA3 and 4)
3. Congress designated the RNRA as one unit and it has been managed as one unit in the 1986 LNF Plan. There is no reason and it contradicts the RNRA designation and history to split it into three different Management Areas.
4. There is nothing in the [ldquo]Need to Change[rdquo] document saying why the RNRA should be split into three different MAs. [ldquo]If it ain[rsquo]t broke, don[rsquo]t fix it.[rdquo]

Recommendation: Put all of the RNRA in one Management Area (6) as Congress designated it. While I understand your direction to minimize management areas, the RNRA warrants a separate management area because it is the only one in the Region and thereby unique and is also a Congressionally designated area like Wilderness which has its own MA in the PA.

P.A. pg 161: Suitability (MA5-SUIT)

01 Recreation emphasis areas are suitable for a high density of recreation development.

Comment: [ldquo]High density of recreation development[rdquo] would exceed all current RNRA mgt goals, standards and LAC Direction. RNRA currently has group size limits. What happened to these? There is nothing in Need for Change to get rid of the group size standards in the RNRA.

Recommendation: See previously described Recommended additions to Desired Condition for ALL OF THE RNRA, not just the [ldquo]south zone[rdquo] and add the current LAC standards into the RNRA Desired Condition.

02 These areas are suitable for multiple facilities designed for use by large numbers of people.

Comment: [hellip][ldquo]designed for large numbers of people[rdquo] would exceed all current RNRA mgt goals, standards and LAC Direction. RNRA currently has group size limits. What happened to these? There is nothing in Need for Change to get rid of the group size standards in the RNRA. RNRA has group size limits. There is nothing in Need for Change to drop groups size limits in the RNRA.

Recommendation: See previously described Recommended additions to Desired Condition for ALL OF THE RNRA, not just the [ldquo]south zone[rdquo] and add the current LAC standards into the RNRA Desired Condition.

02 Facilities may be designed for user comfort and convenience and could be highly refined.

Comment: What does [ldquo]highly refined[rdquo] mean? This term without any specificity doesn[rsquo]t say anything. HOW could facilities be and what is [ldquo]highly refined[rdquo]?

Recommendation: Clearly and concisely define [ldquo]highly refined[rdquo]

Comment: The current RNRA LAC Opportunity Classes are for more primitive recreation experiences. The PA has them all as more developed/less primitive ROS classes.

The main corridor Road/Trail 515 is currently Semi Primitive Roaded I and II with the exception of the first roughly [frac]12] mile of the main corridor Road/Trail 515.

The PA has all of the main corridor Road/Trail 515 as Semi Primitive Motorized. Map GM04 has most of the RNRA in Semi Primitive Non-Motorized, most of the RNRA is currently Pristine or Primitive.

These changes to more developed ROS categories are unwarranted (not mentioned in Need for Change) and will degrade the current less developed recreation settings in the RNRA.

Recommendation: Keep the current ROS classifications found in the 1992 LAC Management Direction for the RNRA

03 Recreation emphasis areas are not suitable for timber production. Vegetation management, including timber harvest, is suitable for other multiple use purposes.

Comment: [ldquo]for other multiple uses[rdquo] means commercial logging for anything. This is a major change

from current condition and 86 Plan MA 28 and 92 LAC Direction and past management. Again, there is nothing in NEED FOR CHANGE to warrant this change.

Recommendation: Delete [ldquo]Vegetation management, including timber harvest, is suitable for other multiple use purposes.[rdquo] Timber harvest, removal of commercial logs, logging, whatever you wish to call it, should be the same as recommended Wilderness and Wilderness suitability which says no timber production and no other type of timber activities.

PA pgs 157-161 MA[rsquo]s 3, 4 and 5

Comment: While Wilderness, the only other Congressionally designated area other than the RNRA has a full complement of plan components and lots of discussion throughout the PA, all of the three MA[rsquo]s that include the RNRA don[rsquo]t even have Goals, the MAS 3 and 4 don[rsquo]t have any Objectives, and the MA 4 and 5 part of the RNRA don[rsquo]t even have Guidelines.

Mgt Area	Desired	Condition	Goals	Objectives	Standards	Guidelines	Suitability
----------	---------	-----------	-------	------------	-----------	------------	-------------

1 Wz	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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2 Rec Wz	Yes	None	None	Yes	Yes	Yes	Yes
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3 Backcountry	Yes	None	None	Yes	None	Yes	Yes
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4 Gen Forest	Yes	None	None	None	None	Yes	Yes
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5 Conc Rec	Yes	None	Yes	None	Yes	Yes	Yes
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Recommendation: Start giving the RNRA it[rsquo]s due and here and throughout the PA stop intentionally

trying to obscure, diminish the significance and reduce the management protections for the RNRA. Give the RNRA its own Management Area with Goals, Objectives, Standards and Guidelines to protect the and maintain the primitive recreation resource and setting.

Monitoring page 177

Designated Wilderness (MA1) Table 98[mdash]Recommended Wilderness monitoring plan components Plan components Monitoring question MA1-DC-01 through 12 MON-MA1-01:

Is wilderness character in existing wilderness being maintained? * 36 CFR 219.12(a)(5) [ndash] v, vi, vii, viii, SEC Indicator(s) and measure(s) IND-MA1-01: Score on National Wilderness Stewardship Performance.

IND-MA1-02: Limits of acceptable change monitoring results. IND-MA1-03. Trends in Wilderness character monitoring results.

Comment: While the above mentions [ldquo]Limits of acceptable change monitoring results[rdquo] there is no tie to any LAC standards, which are currently in place OR which Wilderness areas on the LNF even have LAC

Monitoring standards

Recommendation: Clearly state WHICH LAC Monitoring standards you will monitor (by Wilderness specific document) AND WHICH Wilderness Areas on the LNF have LAC Monitoring standards.

Proposed Action Glossary

Comment: there is no mention, definition or description of: Limits of Acceptable Change based Management Direction or South Zone in relation to the RNRA?

Comment: There is no definition for the geographic area called [ldquo]South Zone[rdquo] of the NRA as mentioned in the P.A. pg 160 Table 2.

Appendix 3: Pot. Management Approaches Possible Actions Pg A3-26 4.2 Sustainable Recreation and Scenery [ldquo]Encourage mass transit opportunities to major recreational destinations or events where feasible.[rdquo]

Comment: This management approach/ action does not help recreation sustainability. All mass transit does to recreation areas is to further degrade the recreation experience, resource and facilities by

creating bringing in more people, creating more crowding, trash and human impacts: Single vehicle recreationists plus mass transit recreationists equals MORE not less impact. The adverse effect of

crowding at recreation sites resulting from mass transit is borne out and already a problem at heavy recreation areas around Salt Lake City Utah, many sites in Colorado and in the Sierra Nevada[rsquo]s in

California. [ldquo]Encouraging mass transit opportunities to major recreation destinations[rdquo] on the LNF will create those problems on the LNF.

Pg A3-39 7.1 Management Area 1: Designated wilderness you say

* [ldquo]Consider physical design or alterations of access roads and trailheads to limit the number of users.[rdquo] and

* [ldquo]Consider physical design or alterations of access roads and trailheads to limit the number of users.[rdquo] and

* [rdquo] Reduce party size limits.[rdquo] and

* [ldquo]Consider permit systems.[rdquo]

Comment: These also apply to the RNRA.

Recommendation: Add these to the Management Approaches and Possible Actions for the new Management Area (6) for the RNRA.

Recommendation: ADD to 4.2 management approaches to address: Unauthorized trails include user-

created trails as well as other unauthorized routes such as decommissioned roads or trails. If total miles of unauthorized trails increase between monitoring intervals by three percent or more over the baseline

in zone I, II or III, assess impacts and determine if management actions are needed to maintain wilderness character. Use the same mgt tools as described in 7.1.

Pg A3-27 4.2.1 Recreation Opportunities (REC)

Comment: What will you do or what management actions may be taken when you exceed recreation carrying capacities or exceed ROS experience levels?

Recommendation: Add management actions you[rsquo]ll take when you exceed recreation carrying capacities or

ROS experience levels.

Text pg A3-27: [ldquo]Consider altering infrastructure to better capture and use natural and man-made snow.[rdquo]

Text pg A3-27: [ldquo]Where possible relocate existing infrastructure and opportunities to areas with less risk of climate-exacerbated damage.[rdquo]

Comment: What do these statements mean? Please explain or expand what on what you[rsquo]ll do.

Text pg A3-28: [ldquo]As possible, remove or decommission vulnerable infrastructure.[rdquo]

Comment: What is climate vulnerable infrastructure? Please clearly state specifically what you are talking about.

Recommendation: Explain in plain speak what [ldquo]climate vulnerable infrastructure[rdquo] is.

4.2.2 Rec Opportunity Spectrum Settings (ROS)

[ldquo]Potential management strategies are those that (1) assist in providing a range of recreation opportunities across the Forest, (2) minimize visitor impacts to natural resources and conflicts between user groups, and (3) construct and maintain facilities and trails to address capacity issues and meet

visitor needs. Potential strategies may include developing a recreation vision and a strategic prioritization process that provides direction for maintenance of existing recreation facilities, construction of new

facilities, and reconstruction of and/or additions to existing facilities.[rdquo]

Comment: What does [ldquo]Potential strategies may include developing a recreation vision and a strategic prioritization process that provides direction for maintenance of existing recreation facilities, construction of new facilities, and reconstruction of and/or additions to existing facilities.[rdquo] mean?

Recommendation: Say something that is more specific, measurable and identifiable so the reader and public will know what you are proposing. Sorry to be candid but your wording here and in many places throughout the PA is just a bunch of bureaucratic double speak and gobbly goop. Please use plain speak and plain language.

4.2.4 Scenery (SCEN) and 4.2.5 Public information, interpretation, and education (PUB)

Comment: Few if any of the management approaches listed for these make any sense.

Recommendation: Delete or reword so the reader can understand what you are talking about. I worked in recreation management for the FS for 30 years and still don[rsquo]t understand what you[rsquo]re talking about.

Imagine how it reads to someone without any recreation or resource management background.

4.5 Designated Areas

Comment: There is no mention or any management approaches listed for the RNRA, which is a Congressionally designated area.

Recommendation: Reference or look at the 1992 RNRA and Wilderness LAC Direction to see how to word possible management actions and develop and present them for the RNRA.

LNFPFPR_ProposedAction_Appendix01_3_GA_GM.pdf Proposed Action Appendix 01 GM Map 01

Comment: There is no identification or delineation of the RNRA, it[rsquo]s all labeled as either General Forest, Backcountry or Concentrated Use Area. Where is the NRA boundary so the reader can know the proposed management?

Recommendation: Delineate the RNA boundary and put all of the RNRA in one MA as stated several times above.

Proposed Action Appendix 01 GM Map 01

Comment: The RNRA should be assigned its own unique MA. There are only two Congressionally

designated areas on the LNF: Wilderness and the RNRA. Wilderness has its own MA but the RNRA is chopped up in the PA into three different MAs (3, 4, and 5). The Rattlesnake Act did not divide up the recreation values in the NRA and the 1986 Plan likewise had one Management Area for the NRA.

Furthermore, NONE of the NRA should be or was ever intended to be managed as [ldquo]General Forest[rdquo] as shown in Appendix 01 GM Map 01

Recommendation: Put all of the RNA in its own unique MA as was done in the 1986 Plan and keep all the current 86 Forest Plan and LAC standards in the revised plan.

Proposed Action Appendix 01 GM Map 03

Comment: All of the Rattlesnake Wilderness is color coded and identified as the Rattlesnake National Recreation Area which is incorrect.

Recommendation: differentiate between the RNRA and Rattlesnake Wilderness on GM Map 03.

Proposed Action Appendix 01 GM Map 04 Summer ROS

Comment: The main corridor Rd/Tr 515 is now changed to Semi Primitive MOTORIZED from current Semi Primitive Roaded I and II. Rd/Tr 515 is currently non-motorized with only occasional administrative motorized use. This is a misrepresentation or major change from current condition. Also, there is no NEED FOR CHANGE for this change in the Need for Change document.

Recommendation: Keep the RNRA in the same Opportunity Classes as in Appendix O-4 of the 86 LNF Plan.

Comment: The rest of the NRA is proposed as Semi Primitive non-motorized when now it is nearly all Pristine. The proposed change is a decrease in solitude in the ROS/NRA. There is no NEED FOR CHANGE for this in the Need for Change document.

Recommendation: Keep the RNRA in the same Opportunity Classes as in Appendix O-4 of the 86 LNF Plan.

Proposed Action Appendix 01 GM Map 05 Winter ROS

Comment: Why is the lower NRA semi primitive non-motorized in the winter? The same motorized administrative motorized access is allowed in the winter as in the summer?

Recommendation: Have the RNRA winter and summer ROS match.

Comment: Why is there one isolated sliver of primitive non-motorized up the NRA corridor surrounded by Primitive? [ldquo]You can[rsquo]t get there from here[rdquo]

Recommendation: Correct this mapping error or explain it.

Proposed Action Appendix 01 GM Map 06 Desired Scenic Integrity

Comment: Why do the isolated parts of the NRA have a lower Desired Scenic Integrity from the Wilderness when they are the same landscape and development level on the ground?

Recommendation: Match the scenic integrity between like areas in the RNRA and Wilderness.

Proposed Action Appendix 01 Map 07: Greater Missoula Lands Suitable for Timber Production and Where

Harvest Could Occur

Comment: This map has ALL of the NRA as [ldquo]where (timber) harvest can occur.[rdquo] This is a major change from the current condition with no NEED FOR CHANGE in the Need for Change document.

Recommendation: The RNRA should be assigned its own MA (6) not only for its unique character and history, but because it is only one of two Congressionally designated area on the LNF, the other being Wilderness, which has its own MA. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and it should clearly state that the RNRA is closed to commercial tree removal, new road construction, existing road reconstruction and will be managed in perpetuity, as was the intent of Congress in 1980, for primitive recreation and where the preservation and enhancement of the

recreation resource is the number one management objective. Proposed Action Appendix 2 Suitability SummaryTable A2-3

Comment: This table has all of the MAs (3, 4, and 5) that include the RNRA as suitable for timber harvest for [ldquo]other multiple use purposes[rdquo], personal use firewood cutting, permanent road construction,

temporary road construction and road reconstruction. This is a major / 180 degree change from the current condition with no justification or NEED FOR CHANGE in the Need for Change document.

Recommendation: The RNRA should be assigned its own MA (6) not only for its unique character and history, but because it is only one of two Congressionally designated area on the LNF, the other being Wilderness, which has its own MA. All of the standards in the 1986 LNF Plan should remain in the Revised Plan and it should clearly state that the RNRA is closed to commercial tree removal, new road construction, existing road reconstruction and will be managed in perpetuity, as was the intent of

Congress in 1980, for primitive recreation and where the preservation and enhancement of the recreation resource is the number one management objective.

Appendix 11 Readers Guide

Comment Why is there no mention or references for Rattlesnake National Recreation Area, South Zone or Limits of Acceptable Change based Management Direction? It appears to the reader/public, like the RNRA is not important or a public issue of interest in the Proposed Action.

Fast Facts

Comment: Since the RNRA is Congressionally designated and the only NRA in Region 1, why isn[rsquo]t it mentioned in [ldquo]Fast Facts[rdquo]? Fast Facts includes designated and recommended wilderness, why doesn[rsquo]t it mention the only designated National Recreation Area in the Region?

Recommendation: Include the RNRA and its significance in [ldquo]Fast Facts[rdquo].

IN CONCLUSION

To close on a positive note, the Lolo CAN and HAS innovated and done things that no one said could be done and innovated to develop new approaches and management tools. I would love to come in and tell you the many projects where your predecessors have done this. But I never get any interest from you. I respect that the job of managing RNRA vegetation without industrial logging and road building may look like a daunting task and that you probably feel great pressure to log log log under the vague and grossly over used guise of [ldquo]resiliency[rdquo] (whatever that means) or that if you don[rsquo]t log everything, then everyone[rsquo]s house will burn down. Home protection and protecting the RNRA recreation resource are NOT an either/or proposition, you can have both. The best way to make existing wildfire- vulnerable developments ignition

resistant is to work within the limited area of the [ldquo]home ignition zone[rdquo][mdash]a home and its surroundings within 100 feet (which may include neighboring homes). (Calkin, et. al. 2023 Proceedings of the National Academy of Sciences).

I know you can tap into the tremendous knowledge, creativity, resources and researchers in the Missoula community, innovate, and do it right for the primitive undeveloped recreation resource in the RNRA.

And I repeat: logging does NOT IMPROVE primitive undeveloped recreation experiences or settings. Don[rsquo]t go there. Don[rsquo]t forget that even if you still want to log it, there isn[rsquo]t even anywhere anymore to send the logs with the two tragic recent mill closures.

Here's hoping you will correct the mismanagement of the RNRA described in the Proposed Action in the next stage of the revised plan. I know from experience and observation that recreation has always been treated as a secondary or tertiary output for the Forest Service, it[rsquo]s culturally ingrained in the Forest

Service. Try to wrap you head around the idea of RECREATION as a resource in itself and the dominant driving management resource in the only National Recreation Area in FS Region One.

Don[rsquo]t use the 2012 Planning Rule as an excuse for why you can[rsquo]t do good management. You are in charge, find work arounds if you find counterproductive direction from disconnected remote staff, get

creative, make it work. Think about how to get to [ldquo]yes[rdquo]. Think about how you CAN DO IT RIGHT rather than WHY YOU CAN[rsquo]T. If the 2012 Planning Rule is an insurmountable barrier, leave the current functional plan in place until you can do a good job and right for the land in a revised Forest Plan.

Remember, the PROCESS IS NOT THE PRODUCT, the PRODUCT IS GOOD ON THE GROUND MANAGEMENT. Move forward, not backwards.

It[rsquo]s really unfortunately, to put it politely, that everyone even has to deal all this. Everyone in this time in our history has SO MUCH stress and stuff to worry about and the RNRA has for the last 44 years been the place where folks can go for some respite, solitude, spiritual enrichment and to try to get a brief hiatus

from all the bad stuff. It[rsquo]s a place where people can [ldquo]recharge their batteries[rdquo] in a nearby primitive undeveloped unlogged setting. So many people in our community fought so hard to get the RNRA we have today. That fight took a lot out the founders of the RNRA. A lot of them are getting older and the next generation won[rsquo]t even know why and how it happened or who gifted them with the gem. These people are conservation legends. But they didn[rsquo]t do it for themselves for fame or recognition, they did it for us and our children and our children[rsquo]s children. You need to know who these people are and honor them and what they gave us.

Quite frankly I suspect most people take today[rsquo]s RNRA for granted. Your plans for the RNRA in the PA are so [ldquo]layered[rdquo], obscured, veiled in vague and unsupported [ldquo]intent[rdquo] and complicated by all the [ldquo]plan components[rdquo] that to be honest, when I first set out to decipher your PA I didn[rsquo]t even know which end was up. Compounding that is your meeting format where no one is allowed to make a substantive comment or ask an in-depth question and get an answer, but rather are cut off by your overly controlling [ldquo]facilitator[rdquo]. I attended one [ldquo]Ranger Chat[rdquo] thinking we would be a two-way conversation, but instead we just were talked at.

I tried for over 10 years to come in and present the RNRA designation and management history to the revolving door of Lolo decision makers but no one would even return my phone call. When I made this offer to the current

Missoula District Ranger, she said [ldquo]No we don[rsquo]t talk to people individually[rdquo]. I was floored. Individual relationships are how trust is built between the Forest Service and the community. Pre conflict relationships make it possible to resolve complex issues when conflicts arise. You never want to meet a person for the first time in a conflict situation, you want a positive relationship in place before the conflict arises, then you have a foundation to work from. That was the thesis of a

professional paper I wrote for the Lolo in 1990. But it[rsquo]s obvious none of the current staff has ever read it and I[rsquo]ll also bet no one on the forest even knows it exists. However, I want to thank Carloyn Upton who was the first Lolo employee to finally express any interest in the RNRA designation and management history and who invited me to come in so she could learn about it. That meeting was after the PA came out. I really hope that now she knows more (and has heard an outpouring of concern from the community about the RNRA under the PA) she will do the right thing and correct your course.

Remember that not everyone lives in your digital world. You should know this. A lot of people,

especially those of us who are [ldquo]long in the tooth[rdquo] need a physical hard copy to read, tab, highlight, make notes on, think about and cross reference. There are thousands of people in the valley whose lives don[rsquo]t include twitter, facebook, web links and all that. Make good on your language about plan accessibility and make the next iterations of the revised plan ACCESSIBLE TO EVERYONE. Use CAN DO outside the box thinking to figure out how you can give hard copies to those of us who are digitally challenged and ask for one. In the currently [ldquo]digital only[rdquo] format, I bare stumbled on the atrocities you had proposed for

the RNRA. I hope you didn[rsquo]t try to obfuscate it on purpose, but you can prove you didn[rsquo]t by helping us digitally challenged people have hard copy access in the future.

While RNRA was managed well from the Rattlesnake Act in 1980 for the following 35 years. But now with the increasingly frequent attacks on the NRA by the Marshall Woods project in 2015 and now the revised forest plan proposed action, it[rsquo]s clear that the management goals, standards and all the [ldquo]plan components[rdquo] in the revised plan have to be even stronger and more prescriptive than in the current plan so that there can be no room a future FS manager in 5, 10 or 20 years to come in and try to twist the meaning of the language and undo what the founders of the RNRA did. The Marshall Woods logging in the NRA was thwarted through the concerted efforts of the Lolo Restoration Committee, which ironically was formed by the LNF to say yes to a logging project but instead said NO WAY, and the work of another citizens coalition similar to those who initiated the RNRA designation. In the end

Marshall Woods didn[rsquo]t log the NRA but rather did the light on the land noncommercial work described in the current forest plan and have since publicly declared it a success. This is your history. I[rsquo]m not a

government hater, I believe in our democratic system and that there are good people in government

trying to do the right thing. I want to trust you, your [ldquo]intent[rdquo] and [ldquo]layered[rdquo] confusion, but you can see how that might be kind of hard.

Nevertheless, I want to give you the benefit of the doubt and a chance to do it right, in clear and precise language in the revised plan. PLEASE, do the right thing.

If on the other hand, you think I[rsquo]m wrong about all the concerns I[rsquo]ve stated above, and that you meant to protect the NRA all along, all you need to do is state clearly, in plain text in every subsequent

reiteration and in the final revised plan how the RNRA will be managed in such a way that doesn't need a PhD in advance planning to understand it. This thing can't be like a game of hide and seek where how

the RNRA will really be managed on the ground and for future generations is hidden and obscured under impenetrable [ldquo]layers[rddquo] and invisible [ldquo]intent[rddquo]. The average Joe or Jane walking, biking, running or

horseback riding in the RNRA has to be able to clearly understand what will and will not be happen in the RNRA and how it will look. We have to stop these increasingly frequent attempts by the Lolo NF to build roads and log the Rattlesnake. We need long-term protection. The next iteration(s) and the final selected alternative for the RNRA needs to clearly say that:

- * The RNRA will have its own management area as at present,
- * You will put in place safeguards and [ldquo]plan components[rddquo] to protect the RNRA and manage it first and foremost for the primitive undeveloped recreation resource.
- * All the goals and standards in the current forest plan and LAC Direction will be kept in place and that that is clearly stated.
- * Those the goals, standards and LAC direction will be further clarified or expanded to avoid any future misunderstanding or misinterpretations and clearly state that consistent with the original intent of the designation, you will not for any reason, log, build new roads, or reconstruct existing roads, graze or permit public motorize use in the RNRA
- * As recreation pressure and the population of the Missoula valley increases, as human caused

recreation impacts increase and as we experience further resource damage from climate change, you will provide additional measures, actions or Forest Orders, not fewer, to protect the

primitive recreation resource and experience in the RNRA.

- * The management footprint will be limited to that of the current condition and that in the future management activities will be unobtrusive and leave a light footprint on the land.

- * That you will use vegetation management methods that utilize hand work and prescribed fire as has been used for the last 44 years and that the RNRA will serve as public demonstration area for light on the land management.

- * Tree cutting will be, as it has been, limited to smaller diameter material that can be handled and disposed of without the footprint, exhaust or noise of heavy equipment, and that you'll leave

the big trees alone.

- * You'll remember at all times that the RNRA was designated in the first place TO STOP

COMMERCIAL LOGGING AND ROAD BUILDING. Say it over and over and over again[hellip]. Honor that intent and those who worked so hard to get it designated. Honor the land and spiritual value of the RNRA.

- * That you will state that the RNRA is a spiritually and culturally significant place for Missoula, with the same standing and significance as culturally significant places have for our Consolidated Salish and Kootenai Tribes neighbors to the north of the NRA and Wilderness.

- * You will work with the public and research communities to develop new, innovative and public involved primitive undeveloped recreation management techniques.

* You will manage the RNRA as it was intended, as a transition zone between Wilderness and the heavy management footprint seen in wide open recreation areas like Blue Mtn, Pattee Canyon, Snowbowl the Hiawatha bicycle RR grade and [ldquo]general forest[rdquo].

* You will: Think: Quiet. Think Solitude. Think Undeveloped. Think of what it looks like now and how to keep it that way.

Talks cheap, but [ldquo]meat ain[rsquo]t meat till it[rsquo]s in the pan[rdquo]. Put it in clear upfront language, not hidden under [ldquo]layers[rdquo] or unspoken [ldquo]intent[rdquo].

Feel free to contact me as I would be glad to help straighten it all out. Sincerely,

Andy Kulla