

Data Submitted (UTC 11): 4/1/2024 10:28:32 PM
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Comments: April 1, 2024

Amanda Milburn, Lolo Plan Revision Team Leader
Lolo National Forest
24 Fort Missoula Road
Missoula, MT 59804

Re: Lolo National Forest Land Management Plan Proposed Action

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>.

Dear Forest Plan Revision Team,

Please accept these comments on behalf of the Blackfoot Clearwater Stewardship Project ("BCSP") Steering Committee in response to the Forest Service's Proposed Action for the Lolo National Forest's Land and Resource Management Plan ("Forest Plan") revision. We greatly appreciate all the work the planning team has already done and hope you will find our comments and recommendations helpful.

Background

We write to you today as a steering committee representing interests from timber; quiet and motorized recreation; the hunting, angling, and outfitting community; the local community, conservation; and more to ask you to consider the boundaries and recommendations we created for the lands of the Seeley Ranger District.

The BCSP's roots are in collaboration as several of us came together to modify travel planning decisions in the Lake Elsina & Lake Dinah area. We formally came together as a collaborative before the Lolo National Forest began the initial revision of its 1986 Forest Plan. We brought together a wide range of stakeholders to legislate the recommendations of the 1986 Forest Plan and, through that process, slightly modify the boundaries of the 1986 plan and incorporate two recreation-focused areas. In 2010, the BCSP Steering Committee helped to establish the Southwestern Crown of the Continent Collaborative in 2010. The collaborative has created or maintained an average of 153 jobs, brought in \$35 million in federal investments, and led to an overall investment of \$92 million in the local economy, resulting in 57,040 acres treated for noxious weeds, 204 miles of stream restoration, and 3,431 miles of multiple-use trails maintained.

We strongly believe that the Blackfoot Clearwater Stewardship Project is an example of how questions about Montana's public lands management should be addressed. We have worked for nearly 20 years as a collaborative to conduct restoration and address questions of forest health and stewardship, recreation management, and conservation. We hope that the work that we have done together for decades, including our proposed management boundaries, will be incorporated in the Preferred Alternative.

By adopting the components of the Blackfoot Clearwater Stewardship Act into the final forest plan, we can ensure that future generations of Montanans will be able to catch healthy trout in the Blackfoot and Clearwater Rivers. We can ensure that future generations can hike, run, or ride horses through a protected landscape that reflects this area's rich history. We can also ensure that the communities of Seeley Lake and Ovando maintain thriving outdoor recreation economies, providing a variety of robust opportunities for public land users, including motorized and mechanized recreation, in addition to quiet recreation. As a steering committee, we also support active management of forests for the stewardship and restoration of the lands where it makes sense. The

Blackfoot Clearwater Stewardship Project is advocating for a balanced set of recommendations that does all of these things and more.

The proposal represents what is best about Montana - that our communities can put differences aside to create local solutions. That was true for the Blackfoot Clearwater Stewardship Project in 2006 when we first came together, and it's still true today. We're all still here at the table and we're all still ready to fight for the solutions we created together.

We are currently working to pass the Blackfoot Clearwater Stewardship Act in the US Congress. But we know all too well that passing public lands legislation can take a long while. In the meantime, we hope the Lolo National Forest will adopt all aspects of the proposal we created in the new Forest Plan.

We look forward to working with you to incorporate the priorities of the Blackfoot Clearwater Stewardship Act in the new Lolo Forest Plan. We are proud of the work we've done together to create this proposal, and we look forward to supporting our vision for the Seeley Ranger District.

Recommendations of the Blackfoot Clearwater Stewardship Project.

As a group, the BCSP steering committee created our proposal collaboratively. We have had many hard conversations about the future of the Seeley Ranger District. As the Seeley Ranger District is the area we are most comfortable commenting on, we will restrict our comments to the roadless acres of the Blackfoot Clearwater Stewardship Act landscape. It is the request of the steering committee that the Forest mirror all of the BCSPA components in the plan, including the recommended Wilderness areas and recreation suitability determinations.

Our BCSPA legislation will establish new Wilderness in the Lolo National Forest as well as create the Otatsy and Spread Mountain Recreation Management Areas, allocating 2,000 acres to high-quality snowmobiling near Ovando and ~4,000 acres for mountain bike access to Spread Mountain, Center Ridge, and Otatsy, Canyon, and Camp Lakes.

Our specific recommendations are as follows:

Marshall Peak/West Fork Clearwater Recommended Wilderness Addition to the Missions Mountains Wilderness: 4,460 acres

Grizzly Basin Recommended Wilderness Addition to the Bob Marshall Wilderness: 7,792 acres

Monture Creek Recommended Wilderness Addition to the Bob Marshall Wilderness: 40,072 acres

North Fork Blackfoot Recommended Wilderness Addition to the Scapegoat Wilderness: 30,967 acres

Otatsy Recreation Management Area (winter semi-primitive motorized ROS, summer semi-primitive non-motorized ROS): 2,013 acres

Spread Mountain Recreation Area (semi-primitive non-motorized ROS, open to mechanized use): 3,835 acres

A detailed legislative map is attached as a separate file.

We also request that the Forest manage recommended wilderness to maintain the Wilderness Character of those areas and exclude non-conforming recreational uses.

We sincerely thank the Lolo National Forest for the opportunity to comment on this phase of the Lolo Forest Plan revision, and again, we look forward to working with you to incorporate the priorities of the Blackfoot Clearwater Stewardship Act in the new Lolo Forest Plan

Sincerely,

Blackfoot Clearwater Stewardship Project steering committee

The BCSP steering committee consists of:

Smoke Elser, Montana Outdoor Hall of Fame member

Jack and Belinda Rich, Rich's Montana Guest Ranch

Jim Stone, Rolling Stone Ranch

Connie and Mack Long, Montana Heritage Outfitters

Gordy Sanders, Pyramid Mountain Lumber, Inc.

Tim Love, retired Seeley District ranger

Addrien Marx, Seeley Lake retired businesswoman and active community leader

Garrett Titus, Montana Wildlife Federation

Lee Boman, former Seeley Lake Community Foundation Chair and founding member of Seeley Lake ROCKS

Jon Haufler, Clearwater Resource Council

Becky Edwards, Mountain Mamas

Zach Angstead, Wild Montana

Shannon and Karl ZurMuehlen, Kraz's Snowmobile and Powersports Rentals

Bill Hodge, The Wilderness Society

Bill Wall, Sustainability, Inc.