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Title:

Comments: Please see attached document. Thank you for your time and energy in putting this plan together!

April 3, 2024

Lolo National Forest Supervisor's Office

Attn: Amanda Milburn - Lolo Plan Revision

24 Fort Missoula Rd

Missoula, MT 59804

SM.FS.LNFRevision@usda.gov

Dear Ms. Milburn,

Thank you for taking the time to consider public comments on the Lolo National Forest Land Management Plan Revision. Generally, the proposed action does a great job to value the protection of vital landscapes. I strongly support the decision to prioritize wildlife corridors and to maintain the previously recommended Wilderness areas as a baseline for the planning process. Specifically, it is encouraging to see that this plan retains the existing Wilderness recommendation in the Lolo Peak area. I am also pleased to see the list of eligible Wild and Scenic Rivers. While I support this plan as a starting point, I also have some specific comments related to conservation and recreation. Each comment is bolded below.

Comments on Recommended Wilderness:

The plan proposes to maintain the recommended Wilderness boundaries in the Hoodoo Roadless Area. I support this part of the plan and would like to see the plan expanded to recommend the String of Pearls roadless areas for Wilderness as well.

The Cube Iron Roadless Complex should also be recommended for Wilderness. This is a crucial wildlife corridor connecting the Cabinet, Bitterroot, and Mission Mountains.

The proposed action should include the protections and recreation designations outlined in the Blackfoot Clearwater Stewardship Act. This proposed legislation represents the hard work and compromise of the people that it would stand to impact. The nearly 80,000 acres of new wilderness that it would protect should be recommended for Wilderness in the action plan. The areas that it recommends for recreation are also a good starting place for consideration of new recreation areas in the Blackfoot Valley.

The proposed action should include the Stony Mountain Roadless Area as proposed Wilderness. It is encouraging that the plan retained its recommendation for the Quigg Roadless Area, but expanding to protect all of the Rock Creek watershed is vital for fish and wildlife habitat.

The Rattlesnake National Recreation Area should be maintained as one management area, rather than split into three. The action plan recommends splitting the RNRA into three separate MAs, which would make it easier to develop and diminish the primitive character of the RNRA.

Comments on Proposed Restoration:

The action plan identifies over 184,000 acres of acquired land that has been designated for restoration. However, the plan only seeks to decommission/improve only 10 miles of road per decade in that area. I support the following recommendations made by MT BHA to better prioritize restoration:

- 1) Add to Table 20 how many miles of roads are on these 184,447 acres of identified land with restoration emphasis.
- 2) Edit Objectives 01 and 02 above to from 10 miles / decade to at least 30 miles / decade which would still be only 3 miles / year. Make the same change with Objectives 01 and 02 on page 94.
- 3) Edit PA Pg 98 Objective 05 Annually maintain at least 50 miles of NFS trails including a variety of wilderness/non-wilderness trails and motorized/non-motorized trails.

Comments on Recreation:

Generally, I do not support increasing the mechanized and/or motorized use of areas that currently prohibit their use. This includes gas-powered and electric vehicles, as well as electric-assisted bicycles. With this in mind, I support the following recommendations made by MT BHA:

- 1) Add to Desired Condition: Unroaded and untrailed backcountry areas remain so and there will be no new road construction into backcountry and limited [ndash] if any [ndash] new trail construction.
- 2) Add to Goals: Backcountry areas are to be managed to keep their primitive and uncrowded character. Management activities should protect solitude and quiet recreation in backcountry areas of the Lolo NF.
- 3) Add to Objectives: Within backcountry areas, user-convenience developments should be avoided. Maintaining solitude and wild characteristics will be priority considerations before any new developments in backcountry areas are permitted.

Winter recreation is an important part of the LNF for many residents and as the climate changes, we can expect winter recreation opportunities to become restricted. As such, the following recommendations improve access for Nordic skiing while minimizing impact. None of these recommendations involve changing the designation of currently roadless areas.

- 1) Allow grooming access between Lee Creek and Lolo Pass, and expand the groomed trail network on roads in the area.
- 2) Improve the parking infrastructure and expand grooming access to Dean Stone Ridge, Skyline Ridge, and USFS roads to the west and southeast.
- 3) Allow access from Gold Creek Road up 1.7 miles of East Fork Rattlesnake/FS 2112 Road to the groomed trails.

Comments on Other Land Uses:

The plan expands grazing to the MA 3 portion of the in the Rattlesnake National Recreation Area. This area is rugged and wooded, making it unsuitable for grazing. It is also home to important wildlife habitat and cold-water fisheries that would be adversely impacted by grazing. The action plan should maintain the current prohibition on

grazing in the Rattlesnake National Recreation Area.

Thank you for taking the time to consider comments and to put together a thoughtful plan for our public lands.