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Comments: The draft assessment is woefully inadequate in addressing one of the greatest drivers of ecosystem change and degradation: rapidly escalating recreation use. The draft assessment contains very little information about the past, present and possible future impacts of ever-increasing recreation use on water quality, wildlife, user experience and other values at risk. Twenty years ago, former Chief Dale Bosworth identified unmanaged recreation as one of the four most significant threats facing the nation's forests and grasslands. While Chief Bosworth's leadership in addressing unregulated OHV use have been largely helpful, serious damage from other forms of unmanaged recreation remain a continuing and increasing threat. I urge the revision team to seriously and impartially assess the threats ever-increasing recreation use pose to the Lolo National Forest.

In particular, the assessment must address current amount and types of current and anticipated commercial recreation special use permits. This is essential for well reasoned programmatic decisions on "sustainable" recreation. Recent Forest Service NEPA regulations (36 CFR 220.6(d)(12) exclude issuance of new special use permits from any public notice, public comment opportunity or documentation of any environmental impacts - unless the proposed commercial use is specifically prohibited by law or the applicable Forest plan. For example, where specifically on the Lolo NF is helicopter assisted skiing prohibited, and where on the Lolo NF is the amount of e-bike and mountain bike use levels limited? The Forest plan assessment must provide much more information on current SUPs and anticipated commercial SUP proposals, and the specific locations where various types of commercial recreation SUPs are currently allowed and prohibited. In addition, the assessment must assess the environmental impacts of these commercial recreation SUPs, especially impacts to wildlife, aquatic ecosystems, and user experiences. In the words of former Lolo NF Supervisor Orville Daniels, "why would I take a piece of precious public land and give it away so a few people can make money?"

The Lolo Forest plan assessment should also address the status and trends of impacts of developed recreation sites, including impacts to threatened and endangered species, and species of concern. The assessment should evaluate the effectiveness of the so called "1-in-10" standard that purports to limit increases in the capacity of overnight developed recreation sites within the Primary Conservation Area for grizzly bears in the NCDE. Recent developments on the Flathead NF indicate that this "management direction" as interpreted by the Forest Service is totally meaningless and does not prevent massive increases in the capacity overnight developed recreation sites, regardless of impacts to grizzlies, other wildlife species, or other values at risk.

Lastly (for now), the assessment should evaluate the overall impacts of increasing recreation use levels in relation to other values at risk. This must include an evaluation of the land's "carrying capacity" and potential thresholds of recreation use levels that undermine the "sustainability" of other resource values. How much recreation use is too much? Is it good public land management for the Forest Service to continue issuing commercial recreation special use permits that use marketing to promote and encourage more and more recreation use at the expense of the public interest. The Forest Service must begin to acknowledge that ever-increasing levels of various types of recreation have significant negative impacts to various other resource values and the quality of experience for Forest visitors. "Wreckreation" is very real. It is occurring at numerous locations on the Lolo NF. It is threatening many of the purposes for the Lolo NF's existence. And it is very likely to get much worse unless the Lolo Forest Plan establishes clear boundaries and enforceable limits. The assessment must objectively assess the current and projected trends in specific types of recreation at specific locations, and the resulting impacts.