

Data Submitted (UTC 11): 3/10/2024 7:00:00 AM

First name: Kirk

Last name: Hudgins

Organization:

Title:

Comments: I Do Not Support the Proposed Action for the Lolo Forest Plan Revision

Dear Lolo National Forest Plan Revision,

I enjoy recreating on and accessing public lands. Montana provides world class off roading and recreational experiences that need to be protected. The proposed action is far too restrictive and I believe better alternatives need to be drafted.

I am opposed to any designations of areas which would allow the closure and reclamation of routes. Those routes exist because there is a purpose and need for them and a history of use. The non-motorized and primitive areas in both the winter and summer ROS zones are not compatible with current use. Any environmental damage identified due to recreation should be first addressed with management solutions such as signage, and education materials. Closure is not management. Through different management strategies and proper education, negative impacts can be properly mitigated without closures and restrictions. I am opposed to all new Recommended Wilderness Areas. The USFS is required to analyze new RWA's however they are not required to recommend areas. An alternative should be produced that doesn't create new RWA's.

The USFS should be looking at ways to provide reasonable access that will sustain the growing numbers of visitation. Often agencies try to address increased use through closures, restrictions, and reservation systems. Each of these approaches is inferior since they create a scarcity of access, which concentrates use in remaining areas. USFS should plan for opening more areas, routes, and amenities to accommodate increased public demand to utilize public lands. Furthermore, recent studies are starting to emerge that show that reservation systems are discriminatory.

The U.S. Bureau of Economic Analysis showed that in 2022 the outdoor recreation industry generates nearly \$1 trillion nationwide in economic activity. By limiting access to the Lolo National Forest or decommissioning trails due to non-motorized designations, the USFS could be harming the local economy and robbing them of potential income. The Purpose and Need of the DEIS recognizes the economic importance of recreation and access.

Dispersed camping is a popular recreational activity that needs to be protected through this plan. Any user conflicts or possible resource damage can be solved through management solutions other than closure and the USFS needs to implement these practices first.

As the Forest Service begins to create winter ROS maps, please consider the historical use and access of these areas. Proposed recommended Wilderness is in areas that provide OSV recreation opportunities. Because of this, the recommended Wilderness should be removed. The areas on the Winter ROS maps also include non-motorized areas that have historically allowed motorized use. USFS needs to have more acres open to motorized winter use. I am specifically concerned about the Seeley Lake area, and Lookout Pass. I would also like the USFS to analyze the Hoodoo and Great Burn area to be opened to motorized use. Most of the motorized ROS zones are surrounded by non-motorized zones which needs to be corrected by making the surrounding areas motorized.

It is important to recognize that discrimination towards American with disabilities within federal land management agencies is deeply rooted and hidden in plain sight. Recreation, primarily motorized recreation has taken a backseat to conservation and protection. Motorized recreation is often the only way those with mobility impairment disabilities are able to enjoy diverse recreation experiences on public lands.

I don't want to see the Forest Service give preferential treatment to any user group over another. I believe USFS can manage for all types of recreation within this area. Motorized and non-motorized users can co-exist and one should not be restricted to accommodate another.

Sincerely,

Kirk Hudgins