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First name: NL Last name: Heil Organization:

Title:

Comments: Hello,

Thank you for the opportunity to comment on the Lolo NF Forest Plan Proposed Action. I appreciate that this type of plan is complex and includes a wide range of considerations.

I'm not sure what part of the document various of my comments fit, so I will try to group them topically.

1. Competing Values

The plan includes data on various values and uses, but does not always provide guidance on how these should be balanced either by topic or geographically. I suggest that in general conservation values should take precedence over human recreational uses. The ecosystem resources in the forest are incredibly valuable and susceptible to damage from both greatly increased recreastional pressure as well as climate change.

2. Grizzlies

Grizzly bears are continuing to recover and re-inhabit areas where they were previously roamed. Protecting this key species' recovery from the brink of extinction may require adjustments to uses, recreation, and human access. If the grizzly is delisted, the State of Montana's proposed management plan will not adequately protect grizzlies. It could actually allow trophy hunting. The Lolo NF should include specific policies and strategies setting grizzly recovery as a priority.

3. Motorized Recreation

It appears that there is some suggestion to allow e-bikes or pedal assist bikes on non-motorized trails. I strongly oppose this, including throughout the "Concentrated Recreational Use" areas. The Lolo NF currently posts signs indicating that e-bikes are not allowed in areas such as Pattee Canyon and Blue Mountain. I support continuing this policy and making that clear in the plan. There are already greatly increased user conflicts between mountain bikes and hikers and horse riders. Also e-bikes are a slippery slope to full motorized use. I also oppose policies that would allow amending travel plans to convert existing non-motorized to motorized uses. Given the lack of enforcement capacity, it is important to have the allowed uses extra clear.

4. Rattlesnake National Recreation Area

a.) The Rattlesnake Recreation Area is a unique part of the Lolo NF. I concur with and support the comments made in an opinion piece by Andy Kulla, former Missoula District Ranger recreation manager, regarding management of this area.

The 1986 Lolo Forest Plan has strict standards to protect its character, setting and primitive recreation experience of the Rattlesnake NRA. "In the new Proposed Action, it is chopped up into three different management areas with much fewer protective measures and would be opened up to new road construction, reconstruction of existing roads and construction of new temporary roads, in addition to timber cutting and removal."

"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."

b.) I am confused by the map showing the main Rattlesnake corridor as "Semi-Primitive Motorized." I strongly

oppose any motorized recreational use in this area (and the entire Recreation Area). The main corridor road was previously used to access the Mountain Water dams now owned by the City of Missoula. Cross-country ski trail grooming using snowmobiles has been allowed. However the main corridor is not open to general snowmobile use. Nor is it open to e-bikes, off-road vehicles, motorized scooters, etc.

I appreciate your efforts on this challenging project.