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Lolo National Forest

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Re: Lolo National Forest Land Management Plan Proposed Action

March 28, 2024

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

Dear Forest Plan Revision Team,

Please accept my comments in response to the Forest Service's Proposed Action for the Lolo National Forest's Land and Resource Management Plan revision.

I have lived in Missoula since 1995 and have hiked and backpacked extensively throughout the Lolo National Forest (LNF) in both Wilderness, Wilderness Study Areas, and backcountry areas. My time in Western Montana's wild lands has given me a lasting commitment and respect for the landscapes within the recommended Great Burn area.

The Great Burn (Hoodoo Roadless Area) should be Recommended Wilderness during this current 2024 Lolo Forest Plan Revision process based on its important wilderness characteristics and the access it provides to backcountry hikers of all ages, experience levels, and geographic origin. I have hiked, skied, and backpacked over most areas from the Blacklead Mountain trailhead, throughout the Hoodoo Roadless areas, to Ward Eagle in the North.

The Hoodoo Roadless Area (also known as the Great Burn) contains exceptionally wild country that provides outstanding opportunities for both wildlife and quiet recreation. The area's extensive geographic size, wilderness character quality, and wildlife habitat values are critical elements that make the Hoodoo area one of the most outstanding examples of deserving recommended Wilderness in our region.

Ecosystem Integrity and Management

The Great Burn is a vital biological core area for far-ranging wildlife in the Northern Rockies. Species sustainability is severely threatened by fragmentation of habitat. The proposed Great Burn Wilderness is part of several roadless areas that form a biological link between the Salmon-Selway and Cabinet/Yaak/Selkirk ecosystems, facilitating the genetic interchange needed for far-ranging species such as grizzly bears, wolverines, and other sensitive species to persist. The Idaho-portion of this area was described as follows in the Nez Perce-Clearwater 2020 Draft Environmental Impact Statement: "outstanding scenery, the variety and abundance of wildlife species (elk, black bears, mountain goats, and moose) and the high-quality west slope cutthroat trout fishery are major attractions." The Great Burn also provides remote and rugged maternal denning habitat for wolverines.

Sustainable Recreation Opportunities

The 252,000-acre Hoodoo Roadless Area is jointly managed by the Nez Perce-Clearwater (Idaho) and Lolo (Montana) National Forests. Both forests currently manage this roadless area as recommended wilderness.

The adjacent Nez Perce-Clearwater National Forest has proposed opening a 150-foot corridor for the Stateline Trail #738. It would be inappropriate for the Lolo to follow this recommendation and allow mechanized use on the Stateline Trail. This trail goes along the recommended Wilderness Areas across both forests and could invite illegal mountain bike incursions into connective trails that remain in recommended Wilderness. The Stateline Trail has been maintained for stock and foot-users. A recent Missoulian article stated that the trail is in "deteriorating condition." The current trail contains dangerous corners and poor site lines that increase the chances of a fast-moving bike running into a mountain goat or a slow-moving backpacker. This is especially notable given that the Stateline above the Heart Lake trail is a popular destination for families with children.

I have served as a volunteer "Goat" Ambassador at the Heart Lake Trailhead for the past three seasons, answering questions and cautioning folks about wild goat behavior. There are a substantial number and variety of day hikers and backpackers hiking up to Heart Lake, Pearl and Dalton Lakes, and the State Divide Ridgeline trail for access to other backcountry areas. People I have talked with at the trailhead are families with young children and older children, adult hikers, and older hikers coming through for their annual trek into Heart Lake and the surrounding backcountry. Mechanized mountain bike traffic is not consistent with quiet trail travel in these areas, particularly on steep downhill descents off the State Divided trail by more aggressive, high-speed bikers.

Social and Economic Sustainability

The research on the economic impacts of quiet recreation must be included along with other industrial sectors. Timber availability is necessary to help our local timber mills stay in business and contribute to the economic sustainability of rural towns and cities. The impending closure of Pyramid Mountain Lumber in Seeley Lake and Roseburg Forest Products in Missoula points to a need for maintaining local timber availability where appropriate.

A recreation economy makes the LNF decisions key to the economic viability of many small communities around its periphery. Balancing out the economic and social impacts of ALL recreation will be key to informing the plan. The geographic reach of the Hoodoo Roadless Area's attraction is supported by my trailhead host experiences and discussions with hikers and backpackers at the Heart Lake Trailhead. On a given weekend I have talked with people from Montana, Washington, Idaho, Wyoming, and several Midwest and Eastern states, many of whom are on return visits for hiking and camping. Their expenditures for gas, groceries, eating establishments and other local businesses have a positive economic impact on jobs and small business viability.

Recommended Wilderness

The Hoodoo IRA has been recommended wilderness for 40 years and I strongly support the LNF retaining the 1986 recommended wilderness boundary. Unfortunately, the Nez Perce-Clearwater National Forest is also updating its forest plan and at the end of 2023, put out a draft final plan that would open significant sections of the Great Burn to snowmobiling and mountain biking.

The LNF has a unique opportunity to lead the way in protecting the integrity of this ecosystem by working with the Regional Forester and the Nez Perce-Clearwater Forest Supervisor to strongly advocate for the retention of recommended wilderness across both forests to protect this rich habitat for mountain goats, wolverine, and other wildlife at risk from winter motorized use. I have been one of the lucky few to observe wolverines. Once in the Great Burn and once in the Missions; a unique experience that underlines the need for protecting this recently listed species habitat.

The Great Burn provides a crucial linkage habitat for wildlife such as grizzly bears and wolverines. Its value as habitat connectivity cannot be overstated, especially given climate change impacts and the increasing population pressures in Idaho and Montana. An ever-growing recreational demand makes the importance of wild and

remote country for wildlife requiring large, undisturbed landscapes a critical argument for Wilderness protection. Two other inventoried Roadless Areas are worthy of being designated as recommended wilderness; Ward Eagle and Meadow Creek-Upper North Fork. Their wilderness characteristics are still intact and thus they need the full protection of recommended wilderness so they can remain so. Unfortunately, other IRAs along the Idaho/Montana border have not retained their original wilderness characteristics.

References

"Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation," Kimberly Heinemeywer, et. al., *Ecosphere*, www.esajournals.org 1 February 2019, Volume 10(2)

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"Climate Change and Recreation in the Western United States: Effects and Opportunities for Adaptation," Anna B. Miller, Patricia L. Winte, José J. Sánchez, David L. Peterson, and Jordan W. Smith *Journal of Forestry*, 2022, 453-472

Headwater Economics, *The Outdoor Recreation Economy by State* November 27, 2023, at www.headwaters.org