

Data Submitted (UTC 11): 3/28/2024 10:36:54 PM

First name: Daphne

Last name: Herling

Organization:

Title:

Comments: Amanda Milburn, Lolo Plan Revision Team Leader

Lolo National Forest

24 Fort Missoula Road

Missoula, MT

59804

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. As you know I have been active in your commendable public engagement opportunities which have been very helpful in my understanding of the planning process and the Lolo National Forest's goals in creating the plan. The revision team's commitment to an open and transparent process has exceeded my expectations. I am particularly grateful for that.

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 love and respect for the landscapes, rivers, wildlife, forests, trees and plants that endure, often in spite of our human impacts. My years volunteering in the conservation community was born out of this passion. I was on the board of the Montana Wilderness Association (now Wild Montana) from 2002-2012, including 3 years as President and I remain active with the local Wild Montana chapter. Presently I am President of the Great Burn Conservation Alliance (GBCA) although have been involved with the organization for twenty plus years. In addition, I am still active with Friends of Lolo Peak and have been since its inception almost 20 years ago.

The new management plan that comes out of this revision is as important to me as was the initial revision attempt in 2006. Those of us who engaged in that attempt spent many hours giving input and building relationships across user groups. Thus, I am also grateful that this current revision team is committed to evaluating and considering the products that came out of that previous attempt.

Before addressing specific geographic areas in which I am particularly interested, I would like to comment briefly on the preliminary issues identified by the LNF Forest Supervisor.

Ecosystem Integrity and Management

The requirements of the 2012 Planning Rule relating to connectivity and ecological integrity are clear and I am happy to see that the LNF is working to ensure the plan addresses these. All the geographic areas mentioned below are an integral part of the connectivity puzzle to ensure species ability to adapt over time to a changing environment, most importantly that caused by climate change. Promoting greater connectivity in both terrestrial and aquatic ecosystem by keeping mapped management areas consistent with wildlife needs will be key to the future success of plant and animal diversity.

Sustainable Recreation Opportunities

I understand and support the LNF's need to offer a broad range of sustainable recreation opportunities and agree with the adage "there is room on the forest for everyone, but not everyone everywhere".

However, these opportunities must be located in appropriate areas without compromising the above issue of ecosystem integrity. I agree with the LNF Forest Supervisors approach to this issue and would like to see more specifics on the desired conditions for the distribution of ROS classes in summer and winter, management and maintenance objectives for roads and trails and identified opportunities for mountain bikes or ebikes (differentiating mechanized from motorized). The LNF should analyze up to date information on where recreation use has intensified and where user conflicts have arisen to help inform what areas are most suited to which activities.

Social and Economic Sustainability

The research on the economic impacts of quiet recreation must be included along with other industrial sectors. Timber availability is absolutely necessary to help our local timber mills stay in business. I understand that this remains an uphill battle outside of the LNF's purview, especially given the stated reasons for the impending closure of Pyramid Mountain Lumber in Seeley Lake and Roseburg Forest Products in Missoula. Over the years the extractive industries have been somewhat replaced by a recreation economy which 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.

Recommended Wilderness

Below I will address specific geographic areas where I hope the LNF might consider additional Recommended Wilderness from that which is in the Proposed Action.

Managing Recommended Wilderness needs to be consistent and explicit across all MA2's (Recommended Wilderness MA designation in the LNF Proposed action) and I appreciate that the Proposed Action states that motorized and mechanized is not suitable in recommended Wilderness. However, lack of enforcement, lack of compliance amongst some users and some ambiguity of what is/is not allowed recreation means that there is a need for clear standards that fully retain wilderness character in recommended wilderness areas. Technology has allowed users to access previously inaccessible areas and there has been increasing recreational pressures on our public lands. Thus, the LNF has to be forward thinking in developing standards that maintain the desired condition of recommended wilderness areas over the life of this new forest plan.

Interface and Lands near Communities

This is an important issue to all of us living around and near the LNF. I live in the Wildland Urban Interface (WUI) so it is especially important to me personally and I agree that active fuels reduction and restoration management is key to reducing risks from wildfires. The work done by the LNF in Pattee Canyon and Blue Mountain Recreation Areas is an excellent example of fuel reduction and restoration.

Recommended Wilderness Geographic Areas

I support retaining the recommended Wilderness areas that were bought forward from the 1986 forest plan into the proposed action. However, I have the following suggestions for specific areas of the forest.

Hoodoo Roadless Areas (often referred to as the Great Burn):

This area is near and dear to my heart and I have hiked and backpacked more extensively in this area than any Wilderness in Western Montana.

The Hoodoo IRA has been recommended wilderness for nearly 40 years and I strongly support the LNF retaining the 1986 recommended wilderness boundary. I understand that it spans two states, two national forests and multiple districts which makes managing this area challenging. As you are aware, 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.

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 IRA's along the Idaho/Montana border have not retained their original wilderness characteristics.

Cube Iron-Silcox Area:

I have backpacked and hiked into the Cube Iron area. It encompasses three inventoried roadless areas: Cataract, Cube Iron-Silcox, and Sundance Ridge. This area serves as a vital wildlife corridor connecting the Cabinet, Bitterroot, and Mission Mountains. I urge the LNF to change the backcountry MA designation for these three IRA's to recommend Wilderness.

Lolo Peak/Creek Area:

Thank you for retaining the South Fork Lolo Creek recommended Wilderness area boundaries as per the 1987 plan and for the proposed expansion of the Carlton Ridge research natural area. I have spent endless hours hiking and backpacking in this landscape and have gotten to know it at a deep level. And as a member of Friends of Lolo Peak have advocated for the area's protection for almost 20 years.

The Carlton Lake Basin at the foot of Lolo Peak is an important wildlife corridor between the South Fork Lolo Creek Recommended Wilderness to the west and the Selway-Bitterroot Wilderness to the south. While the extension of the Carlton Ridge RNA provides a buffer area, we are asking the Forest Service to fully protect this connectivity and recommend the entire basin area for Wilderness so the management matches the adjacent areas. The basin's critical role is not only as a high elevation wildlife corridor between Wilderness and surrounding protected public lands but it also contributes to the survival of important plant and animal species that are threatened by our changing climate. Lolo Peak and Carlton Lake Basin provide an ecological niche for unique and threatened species such as sphagnum moss meadows, Alpine Larch, pikas, and marmots. Wolverine have also been seen passing through and the Grizzly Bear reintroduction efforts in the northern Bitterroot Mountains ecosystem will rely on wild landscapes like the Carlton Lake Basin. In 2006 the South Fork Lolo Creek recommended Wilderness boundary was extended to the RNA boundary.

Blackfoot Watershed:

The Proposed Action does include recommended wilderness areas along the Bob Marshall and Scapegoat Wilderness. However, I support the Blackfoot Clearwater Stewardship Act and would like to see all of the plan components of the collaboratively created agreement reflected in the LNF plan's analysis. This includes recommending for Wilderness the Westfork Clearwater and the Grizzly Basin of the Swan Range areas.

Quigg/Rock Creek:

I also support retaining the 1986 recommended Wilderness for the Lolo Creek and Quigg/Slide Rock Areas. I urge the LNF to also consider recommending Wilderness for the Stony Mountain roadless area, which is also important for the Rock Creek watershed.

Reservation Divide:

The Proposed Action designates this area as nonmotorized backcountry area. Having taken many hikes along this divide, I would like to see this designation changed to recommended wilderness.

I appreciate that the proposed action has retained the 1986 Recommended Wilderness Areas as a starting point, and I would like to offer these suggestions for what the LNF might include in the plan alternatives.

