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Organization: Friends of the Rattlesnake

Title: Secretary-Treasurer

Comments: We are writing regarding the Proposed Action for a new Lolo National Forest Plan and how that action affects the Rattlesnake National Recreation Area. I, Bill Brown, am a Board Member and Secretary-Treasurer of Friends of the Rattlesnake. My co-author, Cass Chinske, is one of the founders of Friends of the Rattlesnake and was its paid executive director until Congress established The Rattlesnake National Education and Recreation Area and Wilderness in 1980.

Logging in the mid-70s by Montana Power and the prospect of expanded commercial logging with increased truck traffic and road building and negative effects on public recreation, water quality, wildlife, and scenery, created widespread public opposition and led directly to the Founding of Friends of the Rattlesnake. This organization was widely supported and grew rapidly. Friends of the Rattlesnake was not an anti-logging organization. It was against logging in the Rattlesnake and for preservation of a beloved area close to town, its scenery, clean water, wildlife, and opportunities for accessible, primitive recreation and solitude. Without Friends of the Rattlesnake there would not be a Rattlesnake Wilderness or National Recreation Area.

In working toward our goals, Cass went to Congress where he found a sympathetic ear in Montana Representative Pat Williams. Pat helped us refine our goals and proposals, and ultimately introduced the bill that created the Rattlesnake National Education and Recreation Area. Under a section on Management, the Congressional committee report (Report No. 96-1340) recommending passage of the bill, addressed 1) "promotion of public awareness and understanding of the significance of our wildlands as a national resource," 2) protection of water quality, 3) positive management of wildlife and wildlife habitat, 4) public recreation and enjoyment," and 5) "conservation of the scenic, natural, historic and pastoral values of the area." These were all goals that we espoused. But equally important, the report found that "Due to its high watershed values the proposed National Education and Recreation Area (NERA) and Wilderness is unsuited for livestock grazing, timber harvest, mining or other resource development." As we read the Proposed Action and the multiple Management Area designations in the proposed Forest Plan, virtually all these "unsuited" activities could be permitted in all or parts of the National Recreation Area. This change from current management would be inconsistent with the documented intent of Congress and the public's expectation in supporting protection for the Rattlesnake drainage.

A final thought regarding the Rattlesnake's local cultural significance, probably something we didn't fully appreciate 44 years ago: The significance of a unique, protected area like the National Education and Recreation Area for the community and its self-image is huge. No constituency with an interest in promoting Missoula --- think realtors, the Chamber of Commerce, the Missoula Economic Development Group, and the University of Montana -- fails to acknowledge the Rattlesnake as one of our city's desirable attributes. Between 1980 and 1988 I (Bill Brown) was Director of University Information at the University of Montana. My office was responsible for the University news service, the Alumni magazine, program information during legislative sessions, and promotional material like view books and videos directed at potential student applicants. Whenever possible and appropriate, we called attention to the Rattlesnake, its near-by recreational potential and the benefits it offered to the School of Forestry and many academic programs like environmental studies, biology and geology, precisely the sort of thing envisioned with the addition of the word "Education" to the National Recreation Area designation.

All this is background and prelude to our underlying concern: The Proposed Action treats the NERA as something other than a single unit and applies multiple Management Areas to areas within it. This is in contrast to the single unitary Management Area applied over the last 40+ years. In our opinion there is no justification for this change. The fact that the NERA comprises multiple ecozones and biotypes is part of what makes this area

unique and worthy of the "Education" part of its name. It is a single well-defined area, and there is a simple, single solution: manage it as it has been managed in the past, under a single Management Area designation that addresses the goals and limitations set out with the legislation that created it. The area has done well over nearly half a century of light-handed, easily understood management. Confusing things with multiple Management Area designations will not improve public understanding and acceptance, nor will treating the NERA as something other than a single unit better promote the goals sought by the public and intended by Congress.

Thank you for your attention to these concerns.

Sincerely,

William Brown, Secretary-Treasurer Friends of the Rattlesnake
Cass Chinske, Executive Director, Friends of the Rattlesnake