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Title:

Comments: I am writing to object to the Lolo National Forest Land Management Plan Revision #62960,

The 1992 management plan for the Rattlesnake NRA does not need changing.

If the USFS must change the management plan for the Rattlesnake NRA then I am joining others is suggesting these changes in the new plan:

The proposed management of the Rattlesnake National Recreation Area is unacceptable. This is an area that was designated for its combination of wildlands and wilderness values close to an urban area. The proposed management is a transparent attempt to change the management direction for this area from special management protecting the wild, scenic and primitive values to general forest which allows roadbuilding, road reconstruction and commercial logging. The existing Forest Plan manages most of this area the same as the Rattlesnake Wilderness.

The direction outlined below is far more consistent with the legislative intent in designating this area

The Rattlesnake National Recreation Area

Public Law 96-476 established The Rattlesnake National Recreation Area and Wilderness in 1980. The NRA (25,000 acres) is the only NRA in Region 1 and is designated as Management Area 28 in the Lolo National Forest Plan. The baseline environmental condition in the NRA has changed significantly since the 1986 Forest Plan. For example, the area is now continuously Occupied Grizzly Bear Habitat and is part of the Demographic Monitoring Area for grizzly bears in the Grizzly Bear Conservation Strategy in the NCDE. A female grizzly bear with cubs has inhabited the area. Also, the 1986 Plan did not foresee the rising recreation use levels including mountain biking that have significant impacts on Forest resources including wildlife and soils. Nor did the Plan consider climate change science.

There are several necessary amendments to the Standards and Guidelines for the NRA.

- 1. On page III-145 under C. Standards 3. Change first sentence to "Tree removal shall be limited to individual trees to eliminate safety hazards to public users."
- 2. Standards C. 4. Remove current language and replace with "Earth disturbing management activities shall be prohibited."
- 3. Standards C. 9. Remove current language and replace with "INFISH standards for riparian area protection shall be applied to streams within the NRA. Rattlesnake Creek is designated as Critical Habitat for the Bull Trout."
- 4. Standards C. 12. Remove the first sentence and replace with "Natural fire plays an important role in shaping the landscape of the NRA and adjacent Wilderness. Wildfire suppression shall be limited to protection of structures on adjacent private lands."
- 5. Standards C. 14. Remove the entire language and replace with "Road construction or reconstruction shall be prohibited within the NRA."
- 6. Standards C. 15. Remove this section entirely. Additional Recommendations

Mountain bike use is not addressed in the current Forest Plan. The Forest Service must complete

an Environmental Impact Statement on recreational use in the NRA which identifies environmental impacts, the current baseline, and alternatives.

Bikes with electric motors ("e-bikes") shall be prohibited within the NRA. Removal of any biomass from the NRA shall be prohibited. Remove the co-designation of Trail 515 as a road while maintaining legal access to the Wilderness dams.

Thank you