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Organization:

Title:

Comments: To the Lolo National Forest Planning Team,

Firstly, thanks so much for the hard work you've put into the draft proposal! It's obvious that a lot of care and time was put into the document. Rest assured that your hard work doesn't go unnoticed.

My name is Kevin Kromarek and I've lived in Montana my whole life, moving from Great Falls to Missoula back in 2012. I love the Lolo National Forest and believe it's one of the most spectacular forests in our entire country. It is a place that I am so proud to call home. Whether I'm alpine skiing, foraging for mushrooms, or riding around OHV trails on my dirtbike, I feel blessed to have such amazing access right out of my front door.

There's a few things that I specifically would like to comment on in the forest draft proposal, the main one being the team's oversight regarding Fungi. It's understandable that you've overlooked this family of life, given that it's been widely ignored in our forests for the past century, however, the scientific body we now have regarding the importance of these organisms cannot be overlooked any longer.

The draft proposal fails to mention anything scientific about the importance of Fungi's role in keeping the forests healthy. USDA documents that are available for viewing via the Western Montana Mycological Association clearly state the importance of Fungi, and this must be reflected in the final forest plan. Mainly, we need to highlight their role in forming mycorrhizal relationships with the conifer species that make up our forests. Mycorrhizal Fungi are vital in providing every tree that grows in the Lolo with vital nutrients required for their survival that they couldn't otherwise receive. This means that in order to keep our forests healthy, we must also provide ample habitat for the Fungi that coexist with our trees. The trees we all love like the Firs, Pines, Spruces and their cousins all rely on this relationship

Another factor that must be considered with Fungi is their ability to build soil, sequester carbon, and retain moisture in the soil. Brown rot forming Fungi, such as *Fomitopsis pinicola*, are well known for their ability to form Brown Cuboidal Rot, or BCR for short. BCR is a byproduct of their metabolism that breaks down lignin and other cellular materials that otherwise wouldn't be able to be recycled back into the forest soil. This substance not only helps create soil, it also locks carbon into the forest floor at a rate that nothing else I'm aware of is capable of. Given the threat our forests are facing from a rapidly changing climate, we need to do whatever we can to make sure that trees are allowed to rot and carbon is allowed to be cycled as it has for millions of years prior to our intervention with these natural processes.

One way that I would like to see the Lolo NF manage these Fungal resources is to severely limit, if not completely ban any old growth logging practices within the forests. The dwindling resource of Old Growth Forests not only supports Fungi in their ability to sustain healthy populations, but also gives every other life form in the forest a safe haven from the habitat destruction that seems to accelerate with every passing year. Keeping untouched forests intact should be one of our main priorities. Without healthy Fungi populations, we won't have healthy plant populations, and Animals who rely on mushrooms and plants for their forage will lose out on valuable calories needed to survive climate change.

Regarding climate change, another great way that we can improve our practices in order to keep some more carbon and nutrients in the soil is to look to our neighbors in Washington. They've changed their practices regarding slash pile burning and have transitioned to a top-down burning approach. This simple change allows far more biochar to accumulate in the forest floor. More biochar means more forest soil water retention and carbon sequestration, and this change in slash burning would cost us nothing.

Mushroom diversity can be witnessed in the rainy season within any of our old growth sub-alpine conifer habitats, but some of the most diversity I've ever witnessed is within the state line border between Montana and Idaho, from the Bitterroots to Thompson Falls area. Wherever you find Old Growth along this line, you'll find more fungal diversity than you'd ever expect. Specifically in the Elk Meadows-Lolo Pass area, I've seen dozens of unique species in a single day. Some of the mushrooms I can recall from the top of my head are *Cantharellus roseocanus* and allies, *Hydnum repandum*, *Boletus edulus*, *Boletus Grandedulus*, *Polyozellus multiplex*, *Tricholoma magnivelare*, *Leccinum* spp, *Albatrellus* spp., *Sarcodon* spp, *Hydnellum* spp, countless *Russula* and *Suillus* spp, *Cortinarius* spp, *Hygrocybe* spp, *Lactarius deliciosus* complex, *Ramaria* spp, *Clavulina* spp, and so many more that I can't recall or don't yet know the names of. I would love to see the next forest plan revision include protections for old growth habitats as mushroom diversity preserves.

Though my expertise in riparian ecosystems is definitely lacking (mostly due to a lack of public access opportunities in these types of ecosystems) I'd be remiss if I didn't mention the importance of Cottonwood and other Deciduous trees and their important relationships with Fungi. I would love to see less grazing in our few remaining riparian zones in order to avoid soil compaction and waterway degradation that cattle cause in these areas. A few mushrooms that call these habitats home are Morels and Oyster mushrooms, both of which are delicious.

Moving on from Fungi, I also have a few comments regarding recreation in the state line area, near the Great Burn. I would like to see the Hoodoo and Great Burn areas receive Wilderness designation and would NOT like to see any expansion of mechanized transport in the area. Prior to the past 5 years, I would've advocated for some mechanized recreation opportunities in these places. However, Montana has changed so much and our population has increased far beyond the carrying capacity of these places. I believe mechanized transportation in these places will not be sustainable. Proponents of adding mechanized transport corridors in these areas claim that they are some of the only available areas for finding solitude in their sports. That may have been true in 2012 when we were last allowed to use these lands for that purpose, but motorsports and mountain biking have never been more popular, and our population has never been higher. The solitude they're seeking cannot be found with mechanized transport allowed in these areas. Unfortunately the world we now live in doesn't allow for it. Not to mention the added pressures mechanized transport will put on animals that use this area as one of the last remaining migration corridors connecting Glacier National Park to Yellowstone.

Beyond just the Great Burn Area, I would like to see no mechanized transport allowed on Heart Lake Loop, Stateline Trail, Carlton Ridge to Mill Creek on Lolo Peak, Cube Iron Roadless Complex, and any of the other areas mentioned by mountain bike missoula at this page: <https://www.mtbmissoula.org/post/speak-up-today-for-access-on-the-lolo-nf>. I am a big fan of this organization, but I disagree with their stance. They talk of "Backcountry Access Corridors" but fail to define what that looks like. There are plenty of existing recreation opportunities for mountain biking in the Lolo National Forest without adding more pressure to the ecosystems. Regarding Motorcycles and Snowmobiles, I would like to see zero expansion on where this recreation can be accessed. Internal combustion engines totally destroy the character of a place, and are annoying to on-foot users. Perhaps if they were required to have real mufflers on their noisy engines I would feel differently, but regulations like that are nearly impossible to enforce anyways. Regardless, we've already sacrificed entire mountain ranges, such as the Flint Creek Range, to these types of activities, and I don't want to see the same destruction come to the remaining intact ecosystems in the Lolo. I am more than happy to sacrifice my ability to ride in these areas for the protection of habitat. I also believe that other riders would feel the same way if they had the same understanding of the biodiversity loss our motor vehicles can cause.

Closer to Missoula, I'd like to echo the sentiments of Andy Kulla and his op-ed for the Missoulian here: [https://missoulian.com/opinion/column/andy-kulla-dont-mess-with-the-rattlesnake/article\\_25448032-da2d-11ee-b28b-27324957eddb.html](https://missoulian.com/opinion/column/andy-kulla-dont-mess-with-the-rattlesnake/article_25448032-da2d-11ee-b28b-27324957eddb.html)

I feel that his comments do a wonderful job in speaking for the Missoula community regarding how we'd like that

area to be maintained. It's a special access point for our community, and it should continue to be managed in the way that it has been.

Our waterways are vital to the health of our forests, and our human population centers. I would like to see the recommended designations implemented in the forest plan from American Rivers seen at the map here:  
<https://amrivers.maps.arcgis.com/apps/webappviewer/index.html?id=5eda7ae7e0a546a2a8bbeade6fd43de2>

I'm sure there are a few things I'm forgetting. This forest is not only huge in area, but also a huge part of my life, so it's difficult to remember every single spot that I love within this place. In an ideal world, I'd like to see Wilderness designation granted to any WSA or proposed wilderness area in the entire Lolo. The world simply doesn't have enough remaining wild habitats to ignore protecting the ecosystems that do still exist.

Thanks again for your time and consideration. I hope to see some of my comments implemented into the next iteration of the forest plan. If you folks need a resource for mycological information, we fortunately have a wonderfully smart and helpful organization specializing in Fungi and forest diversity at the Western Montana Mycological Association. If you would like more information on mushrooms and how you can improve their representation in the forest plan, don't hesitate to contact me directly, or email local mycologist Larry Evans at [fungaljungal@gmail.com](mailto:fungaljungal@gmail.com).

Best regards,  
Kevin Kromarek