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First name: Bert

Last name: Lindler

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

April 1, 2024

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

Dear Ms. Milburn,

Although I value every acre of the Lolo National Forest (and a few that may yet be acquired), I will confine my comments on the Proposed Action to large areas of intact wildlife habitat along the Montana-Idaho Stateline west of Superior.

The centerpiece of these lands is the 252,000-acre Hoodoo Inventoried Roadless Area, commonly called the Great Burn Recommended Wilderness (Great Burn).

I am thankful that the Proposed Action continues:

*Recommending wilderness classification for the Lolo National Forest's (Lolo's) one third of the Great Burn

*Prohibiting motorized and mechanized travel in the Great Burn

The Great Burn provides important habitat for the following key fish, wildlife, and plant species:

*Bull trout (listed as threatened under the Endangered Species Act)

*Grizzly bears (threatened)

*Lynx (threatened)

*Mountain goats (Species of Conservation Concern on the Lolo)

*Whitebark pine (threatened)

*Wolverine (threatened)

Bigger is better when it comes to habitat for these species and many others. On the Lolo and Nez Perce-Clearwater National Forests there's no bigger unfragmented, undisturbed still undesignated wildlife habitat than the Great Burn.

The Great Burn provides a way station for wildlife to move between the Cabinet-Yaak and Northern Continental Divide ecosystems north and east to the nearly 4-million acres of Wilderness to the south. Grizzly bears, in particular, are in need of a way station as they expand populations in the north toward the Selway-Bitterroot and Frank Church-River of No Return Wildernesses to the south.

Snow lingers into May and June on the 7,000-foot peaks and ridges along the Montana-Idaho Stateline. Female wolverines need that snow for dens to raise their kits. As our climate warms, high peaks and ridges will also provide natural air conditioning for critters such as pikas that won't be able to live without it.

The Great Burn is too important for wildlife to risk legalizing snowmobiling and mountain biking, which allow

people to travel further and faster into this wild country.

For many centuries, visitors to the Great Burn could cover mountain trails no faster than a horse's three miles an hour.

Speed shrinks the world, just as it shrinks the protection the Great Burn provides. Mountain bikes can go faster than hikers and horsemen. Ebikes faster yet. Snowmobiles can spin miles beneath their belts in the time hikers spend getting out of sight of their vehicle.

When considering whether regulation could allow these technologies a place in the Great Burn, ponder the inability of regulations to keep snowmobiles out of the Blacklead, key mountain goat habitat. Consider also how few of the steepest areas of the Great Burn could be snowmobiled four decades ago when the present forest plan was written. And consider how likely mountain bikes are to be replaced on forest trails by ever-more powerful ebikes during the decades to come.

In addition, I request recommended wilderness classification for the 7,200-acre Meadow Creek/Upper North Fork Inventoried Roadless Area directly north of the Great Burn.

Thanks,

Bert Lindler
A Friend of the Great Burn
Missoula, MT 59808
blindler@montana.com

P.S. Regarding the Missoula Nordic Ski Club's proposal to extend ski trail grooming from Lolo Pass to the Lee Creek Campground/Trailhead, I'm all in. Whether grooming is extended or not, I would like to see the parking lot by the vault toilet plowed each winter.

When conditions are favorable, skiing at Lee Creek is a great alternative for cross-country skiers and snowshoers, particularly those with dogs. Given the lack of easily accessible trails for skiers and snowshoers with dogs, if grooming is extended to the Lee Creek trailhead, I would recommend allowing dogs on the lower two miles of the Lee Creek Road to the junction with Lower Lee Ridge Road 4322. The Lower Lee Ridge is relatively level and would offer a great alternative for skiers with dogs who might not be welcome on the groomed ski trail at that point.