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Lolo National Forest Supervisor's Office

Attn: Amanda Milburn - Lolo Plan Revision

24 Fort Missoula Rd

Missoula, MT 59804

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Re: Lolo National Forest Plan Revision Comments from the Missoula Nordic Ski Club

Dear Amanda Milburn,

Thank you for the opportunity to provide feedback on the Lolo National Forest Proposed Action and for all of the amazing work the Forest has done around the revision process, specifically around public engagement, thus far.

Missoula Nordic Ski Club represents the interests of over 800 member skiers, and multiple thousands of non-member skiers, in Western Montana who enjoy access to groomed cross-country skiing trails. We balance the need to groom trails, parking infrastructure, and winter road access with the user's desire for quiet recreation. Within the Lolo National Forest boundary, groomed ski trails are located in Seeley Lake, the Rattlesnake National Recreation Area, Lolo Pass, Gold Creek, and Pattee Canyon. We are specifically responsible for grooming in the Rattlesnake and Pattee Canyon, which see heavy skier use throughout the winter. We are also grooming trails up the Gold Creek drainage and are interested in expanding access to the area for users.

As it relates specifically to nordic skiing opportunities, we support the 1986 plan and many elements of the new Proposed Action; however, there are several items that need clarification. Furthermore, we want to emphasize the importance of the above areas to our membership and community and highlight ways in which the new plan might consider climate change as it relates to sustainable nordic skiing in the Missoula area.

After reviewing the Proposed Action, our comments and recommendations are below:

The winter and summer ROS maps currently include sections of the Rattlesnake, specifically all of the main corridor in the summer and the lower section of the corridor in the winter, as semi-primitive motorized. Our understanding is that this designation is not for public use and will be clarified as administrative in the subsequent travel management plan. Our recommendation is to clarify this in the ROS designations and add language that ensures the corridor will not be open to public motorized vehicle use.

The Rattlesnake's National Recreation Area status is important to our members and it is vital that the existing management standards for the area be consistent with the 1986 plan. Currently, the language in the PA around timber harvest and production is confusing; we recommend clarifying the difference between timber harvest and commercial timber production. Additionally, we ask that the Forest Service clearly indicate that the Rattlesnake NRA designation will be maintained in the new plan and that timber production will not be allowed within the NRA.

As climate change is warming our winters, we are unable to rely on consistent nordic skiing at our lower elevation locations around Missoula such as the local golf course. With this in mind, we recommend inclusion of grooming access on the Montana side of Lolo Pass, specifically expansion of groomed nordic ski trails between Lee Creek

## Campground and Lolo Pass.

We are seeing increased use at Pattee Canyon, and the current infrastructure does not meet the demand as stated in 3.2.8 of the PA. Improved and expanded parking infrastructure is needed as the demand for nordic skiing in Missoula continues to grow. We also recommend the inclusion of grooming and trailhead access in higher elevation areas on the Dean Stone Ridge and Skyline Ridge 2127-1 Trailhead and USFS lands and roads to the west and southeast.

In order for users to access the trails we groom up the Gold Creek drainage, we need road access up 1.7 miles of East Fork Rattlesnake/FS 2112 Road from the intersection with Gold Creek Road. We hope the Forest Service will support us in establishing trail access in this area as a future climate-safe area for nordic skiing.

4.5 MA 5 on Concentrated Recreation Use does not mention nordic skiing as a featured activity at Pattee Canyon or the Rattlesnake Recreation Area, despite very high traffic levels of skiers at both locations. We recommend adding nordic skiing to the list of activities in these two areas in Table 72. We also recommend clarifying whether the areas in the table are measured in acres or miles and stating how the number is calculated- for example, the number 469 seems far too high for Lolo Pass nordic skiing.

Under Desired Conditions 06 MA5-DC, the plan stipulates that the forest will provide opportunities for competitive and noncompetitive events. Especially at Pattee Canyon, Missoula Nordic strongly supports the development of this opportunity, which is currently missing completely. We recommend an inclusion of competitive and noncompetitive event opportunities at Pattee Canyon for nordic skiing specifically.