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Comments: Thank you for all your hard work on the draft plan. I especially thank you for continuing to recommend wilderness designation for the recommended wilderness areas from past planning efforts. More specific comments follow.

#### Wilderness:

I strongly support recommended wilderness classification for the Great Burn, formerly called the Hoodoo Recommended Wilderness. I support managing this area to exclude motorized and mechanized travel in this area.

I also strongly support the other recommended wilderness additions, including the Bob Marshall Additions, the Selway-Bitterroot Addition, and the Sliderock area.

I would also like to see the Lolo NF recommend the Cube Iron-Silcox/Sundance Ridge area for future wilderness designation.

#### Research Natural Area Additions and Management:

I support expansion of the Carlton Ridge RNA, to protect additional subalpine and hybrid larch trees in that area.

I support expansion of this area to include the area originally proposed by Steve Arno and others.

I support expansion of the Shoofly RNA to include additional sloped fens and other wetlands in the area around the Shoofly Meadow basin. The current boundaries leave out a number of fens and springs that contribute to the ecological integrity of the Shoofly meadow area. I would like the Lolo NF to work with the Rocky Mountain Research Station to evaluate the surrounding fens and wetlands for inclusion into this RNA. I would also like to see the management of the Shoofly RNA changed to be more protective of the vegetation and unique species that occupy this area. I am specifically concerned about snowmobile use in the RNA. Snowmobiles currently use Shoofly Meadow as a play area (from what I could see, flying over the area years ago during late winter).

Snowmobiles can compact the snow, hindering movement of subnivian wildlife species. Shoofly Meadow is a known northern bog lemming site. Trespassing motor vehicles is a continuing problem at Shoofly during summer. The Lolo NF needs to do a much better job of managing this special area, to protect the special natural values of this area.

#### Species of Conservation Concern:

The northern bog lemming has not yet been designated as a SCC, even though it should be. Please review my prior comments on this species. This species is designated as an S2 species in Montana. The Lolo NF sites represent a large portion of the southern-most occurrences for northern bog lemmings, and is very important for the overall conservation of this species.

I have concerns in general of how the Lolo NF completely ignores the other Montana Species of Concern (SOC). All designated Species of Concern should be considered during evaluation of projects such as timber sales, trail construction, recreation, and grazing. The Montana SOC list is developed through a scientific scoring process that looks at population trends, threats, and current range information. It is updated much more often than forest plans, which often lock in certain species for extra management, even after the population changes. It seems unnecessary for the Lolo NF to maintain its own list of special conservation species. The list of SCC species developed by the Lolo NF seems to be a bit arbitrary in how some species were included, versus excluded. I would like that list to be much more inclusive. I have yet to see an adequate description of how SCC species would be managed, compared to other non-SCC rare species.

#### Grazing and Rare Plants:

The plan does a very poor job of describing the current grazing allotments, or providing any information about them. How can we review or comment on it with so little information provided? I am concerned about livestock

grazing impacts on some rare plant species. I was recently reminded that there are grazing allotments when I was up Tamarack Creek last summer. I noted that there were far fewer clustered lady slipper plants in this area than what I had observed in prior years. The area had a lot of evidence of cattle use, including cow pies and trails, even on the steep hillside where the orchid population was. The clustered lady slipper is a Species of Concern, with most Montana occurrences being on the Lolo National Forest. I do not remember seeing any mention of this rare species during the SCC evaluation.

#### Unique and Rare Habitats

I again ask you to designate peatlands (including fens) as a unique and rare habitat. Please see my prior comments on this. Peatlands support a large number of SOC plant and animal species, so they should be given special management considerations in the forest plan. The Lolo NF plays an important role in managing the peatlands in western Montana. Let's recognize this by designating peatlands as a unique and rare habitat.

#### Route of the Olympian and the Great American Rail Trail

Long segments of the old Milwaukee Road railroad bed cross forest service land in Mineral County, yet I see no mention of the Route of the Olympian in the draft plan. The Lolo NF is missing a huge recreational opportunity that would greatly benefit local communities in Mineral County, as well as forest users. There is a national effort to complete the Great American Rail Trail across the U.S. The Lolo NF should recognize this as a future recreational trail, to be developed in conjunction with the numerous partners who are already working on this effort. This rail trail connects with the Hiawatha Trail, and could connect with other existing and future trails in the area. The Lolo needs to get this into their plan as a concept, to help support ongoing and future efforts to complete and manage this rail trail.

#### Ebikes

The Lolo NF barely mentions ebikes in the draft plan. Ebikes are becoming very popular, and offer opportunities for a wider variety of people than traditional bicycling. The Lolo NF should do a better job of defining how ebikes can fit into the recreational structure of the national forest, beyond simply allowing them on current motorized routes. I recommend the Lolo use this planning process to 1) describe the different classes of ebikes (class 1, 2, and 3) and how they could be managed differently; 2) describe in general how they could fit into current and future recreational activities; and 3) Set up a planning process to address ebike use on the forest.

I suggest the Lolo should evaluate ebike use on a case-by-case basis on trails currently designated for non-motorized use in areas where there would be minimal impacts to natural resources or other users. For example, the Tahoe National Forest has developed a multi-use recreational trail for bicycles, class 1 ebikes, hikers, and horseback riding (<https://www.fs.usda.gov/detail/tahoe/news-events/?cid=FSEPRD1168193>). Note that this multi-use trail is not open to motorcycles or ATVs.

Ignoring ebikes or simply relegating them to motorized routes is bound to raise conflicts with traditional motorized users (ATV and motorcycles that travel much faster), and encourage violations of existing use regulations.

Defining a process to evaluate places open to ebikes would help involve the public, develop partnerships, and reduce conflicts as this use expands. I'm not sure when the Lolo NF is scheduled to update the travel plan, but the next travel plan may be too far in the future to be on top of the increasing ebike use.

#### Clearwater Canoe Trail

I have noticed a huge increase in the number of large groups floating the Clearwater Canoe Trail that appear to be associated with a local dude ranch. I would like to see the use by outfitters (or non-permitted outfitting, whatever it might be) evaluated and limited if it appears to be negatively impacting individual floaters.

#### Cross-country skiing

Please keep the area between Lolo Pass and Lee Creek closed to snowmobile use, to provide a quiet recreation place for skiers and snowshoers. I support the local ski club's efforts to expand cross-country skiing opportunities on the Lolo NF, as climate change makes some of our current areas unusable. I especially prefer cross-country skiing on closed, but ungroomed gated roads as my preferred type of skiing. The Lee Creek parking lot used to

be plowed in the winter. Please restore this important winter recreation area to use by plowing the parking lot. The places open to non-groomed skiing have been shrinking in recent years, due to increasing snowmobile use and removal of bridges that formerly provided access to gated roads in winter. The developed cross-country skiing area at Lolo Pass has become increasingly crowded, as people have fewer options. I like to ski with my dog, and options open to dogs have become increasingly rare. Groomed ski trails are fine, but those of us who like ungroomed trails for skiing (or snowshoeing) seem to have fewer places to go.

Thank you for considering these comments!