

April 1, 2024

Amanda Milburn
Plan Revision Team Leader
26 Fort Missoula Road
Missoula, MT 59804

Dear Ms. Milburn:

Thank you for the opportunity to comment on the Proposed Action. I am a Missoula resident and have lived for the past 22 years only a few tenths of a mile from the Lolo National Forest. I know a small part forest well, specifically the area between LaValle Creek and Butler Creek, extending north from the Lolo NF boundary toward Snowbowl and Point Six. In my comments, I will refer to this area as the LC/BC area.

I. General comments regarding ROS settings:

The ROS maps provided with the Proposed Action (PA) were of limited use. More useful maps would have much better resolution at large scale and the tinting of ROS settings would be less opaque so that the underlying map can be seen more clearly. It would be helpful to have new maps of existing ROS and desired ROS. A brief description of the source(s) of data used in creating the maps and the process used to identify areas where changes in ROS setting are desired would have been useful.

The ROS maps include some puzzling (to me) classifications. For example, in both the existing ROS map and the desired ROS map, Snowbowl is classified as “primitive” for winter use, yet Snowbowl does not meet the description of “primitive” stated on p. 60 of the PA.

II. Specific comments regarding ROS settings in the LaValle Creek/Butler Creek area:

I was surprised to see that “semi-primitive motorized” is the desired ROS setting for summer use in the LC/BC area. The area is currently closed to recreational motorized use and has been that way since at least 1996. The 1997 travel plan map for the west half of the Lolo NF was developed using 1996 data and shows the forest roads within the LC/BC area (other than Snowbowl Rd.) as yearlong restricted access. The Lolo NF has a locked gate located on private property on Point Six Rd. with signage noting the restricted road status. The actual forest boundary is 0.2 miles beyond the gate. A potential access road from Snowbowl road has also been gated, and is shown as restricted access on the 1997 map.

The existing ROS maps provided for the 2023 plan development workshops classified much of the LC/BC area as in the “semi-primitive motorized” ROS setting for summer use. But as noted above, motorized recreational use in this area is not currently permitted because of yearlong restricted road access. This raises the possibility that the desired ROS setting for summer use in the PA map simply carried forward that error rather than being an intended change.

The Leader’s Messages posted on 3/12 and 3/25 at the Lolo NF Land Management Plan Revision Hub mention some issues and errors in ROS maps. I hope the “semi-primitive motorized” ROS setting for summer use in the LC/BC area was unintended and will be corrected in future maps.

However, if “semi-primitive motorized” is the intended desired ROS setting for summer use, it will adversely impact a wide range of existing values within the LC/BC area, including existing quiet recreational uses and safety as well as wildlife habitat. Current recreational uses include hiking, dog walking, mountain and gravel biking (enabling a loop ride with Grant Creek or even the Rattlesnake for ambitious riders), hunting, horseback riding, xc skiing, snowshoeing, and birding. Additionally, it would adversely impact adjacent private property owners who already

bear the burden of dealing with impacts from public access via Point Six Rd., including illegal dumping, shooting, trespass, damage and vandalism of private property, partying, fires, and dog waste.

Other than at Snowbowl, recreational use within the LC/BC area is currently low, as is use by authorized vehicles. Recreational users are aware that authorized vehicles may be present, and drivers of those vehicles are aware that recreational users may be present. It has been my experience that most recreational users as well as most drivers seek to be respectful of other users.

It seems likely that there will be increased use of this area during the lifespan of the revised land management plan. There are proposed plans for roughly 1500 housing units that would be in the DeSmet Elementary School district. Recent rezoning of land north of I-90 between Butler Creek and the Wye would allow another potential 13,000 housing units. Given the popularity of quiet forms of recreation, it seems likely that future Lolo NF users might appreciate the opportunities for quiet recreation and even solitude the the LC/BC area now provides.

The LC/BC area provides habitat for numerous wildlife species, including grizzly and black bears, gray wolves, mountain lions, coyotes, red foxes, bobcats, moose, elk, mule and whitetail deer, and even an occasional bighorn sheep. The forest provides year round habitat for resident bird species and nesting habitat for migratory species. The impacts of roads and motorized travel on wildlife are well documented, with effects that may include (depending on species) reduced habitat use, reduced reproductive success, stress, and increased mortality. Allowing motorized recreational use of the area would allow visitors to travel much further into the more remote areas than typical non-motorized users, potentially impacting species that prefer those remote areas.

Opening the LC/BC area to recreational motorized use could conflict with plans to support grizzly bear recovery and connectivity. The LC/BC area is within the Northern Continental Divide Ecosystem Zone 1 and the presence of grizzly bears has been documented here. Documentation includes photos and video recorded from a camera trap in 2021 of the grizzly family (sow with three cubs), location points transmitted from a collared grizzly that travelled through the area in 2011, and a 2023 photo.

Appendix 9 of the PA, "Grizzly Bear Plan Direction" includes the following:

1.7.3 Standards (NCDE-LNF ZONE 1-STD)

01 Within NCDE zone 1, there shall be no net increase above the baseline in the density of roads open to public motorized use during the non-denning season on National Forest System lands.

Given the many possible potential adverse impacts from allowing summertime motorized recreation in the LC/BC area, I hope the desired semi-primitive motorized setting shown on the PA map was simply an error and will be corrected. If not, I strongly encourage you to change the setting to semi-primitive non-motorized to protect the area's existing uses and values.

Thank you for considering my comments, and thanks to you and the rest of the revision team for all the time and work on the revision thus far.

Sincerely,

Jaye Melcher