

May 15, 2023

Dear Lolo National Forest Plan Revision Team,

Please accept our comments on the Wilderness Recommendation Process and Inventory. Our comments are primarily focused on the Great Burn and Ninemile Valley areas as we spend most of our time there and are most familiar with them. We don't mean to imply other areas of the Lolo National Forest don't merit attention on this matter. We also appreciate the extended comment period.

Regarding the over-all process of Step 1, and the Inventory of Lands that may be Suitable for Recommendation into the National Wilderness Preservation System, it is indeed very inclusive and will require some additional 'fact finding' as you evaluate these lands during Step 2. We ask for a couple of considerations as you move forward.

First, we believe the correct term is "Recommended Wilderness," as is used in the FAQ on the Wilderness Recommendation Process. However, in the process paper on this topic (Lolo National Forest Wilderness Process) the use of the term "Proposed Wilderness" is used over and over. We certainly could be wrong, but I think 'Recommended' is the proper terminology; but using both terms interchangeably is probably not correct. While we do have Proposed Actions, we don't think we have Proposed Wilderness. Please help to minimize confusion by using whatever phrase is the proper one.

Second, the Inventory criteria look fine to us. We understand that the current comment period is to help refine the Inventory and gather any more information prior to moving into evaluating these polygons as suitable for recommendation (Step 2). However, as you move into Step 2, we feel strongly that given all current direction regarding Connectivity (e.g. 2012 Planning Rule; FSH 1909.12, Chapter 20, Section 23.11b; USDA memo 1077-004; CEQ Guidance letter dated 3/21/23) *and* what we currently know about climate change and increasing human development, it seems that this would be an opportune time to include connectivity into your evaluation criteria process. We understand that considering connectivity at this stage would be one of many criteria used when determining whether an area is suitable to be recommended for wilderness. Although additional plan components (at a later stage) will take a wider look at connectivity across the landscape, we feel that this should also be a criterion for wilderness recommendation.

Lolo National Forest is centrally located between grizzly bear recovery areas and is key to wildlife corridors connecting the Bitterroot, the Northern Continental Divide, and the Cabinet-Yaak Grizzly Bear Recovery Areas. The Great Burn, for the most part currently managed as recommended wilderness, is the hub of this potential travel network. Recommending it for wilderness (Inventory polygons GB-PW-08; GB-PW-INT-01; GB-01; GB-02; GB-03; GB-04; and GB-05) would best protect its potential connectivity habitat from degradation. We ask that you strongly consider the Great Burn for recommended wilderness to protect it as a connectivity hub. This would benefit grizzly bears along with a host of other species that could utilize this area as a steppingstone to other protected lands.

Currently the Ninemile Demographic Connectivity Area (DCA) is designed to promote grizzly bear occupancy and ultimately passage to the Bitterroot Ecosystem. Unfortunately, there is no current designated wildlife corridor extending this protection south of Interstate 90. Wilderness designation provides the most protection from development, but there are other methods to protect or enhance connectivity and the strategic placement of management areas such as DCA's, Inventoried Roadless Areas (IRA's), or other management areas with limited road densities could be used to enhance

connectivity, as directed by the current planning rule and CEQ guidance. We're comfortable with IRA's as connectivity habitat but these areas would be afforded better protection if they were recommended wilderness.

Prominent ridgeline IRA's are important for wildlife. Areas like Reservation Divide (Inventory polygon # 24); Stark Mountain (Inventory polygon # 35); Mount Bushnell (Inventory polygon # 5; Cherry Peak (Inventory polygon # 8); Sheep Mountain-Stateline (Inventory polygon #31); Meadow Creek-Upper North Fork (Inventory polygon # 32); Burdette (Inventory polygon #36); Petty Mountain (Inventory polygon # 40); and Deep Creek (Inventory polygon #42) all provide opportunities for excellent travel ways and secure blocks of habitat for wildlife occupation and movement. These are areas that are familiar to us, and while they may not make the final cut for Recommended Wilderness, we do believe they are very valuable for wildlife, and would like to see them managed for a Backcountry non-motorized (year around) designation meant specifically to promote wildlife habitat and connectivity, or some similar, road limited designation. Protecting these areas would provide relatively secure wildlife corridors to and from larger blocks of more protected habitat, such as the Great Burn Recommended Wilderness (Inventory polygons GB-PW-08; GB-PW-INT-01; GB-01; GB-02; GB-03; GB-04; and GB-05), the Northern Continental Divide, the Bitterroot, and the Selway-Bitterroot Recovery Areas.

We appreciate your attention to our letter, and we look forward to our continued involvement. Feel free to contact us at any time.

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