

May 16, 2023

Lolo National Forest Supervisor's Office
c/o Amanda Milburn, Plan Revision
24 Fort Missoula Rd.
Missoula, MT 59804

Sent via Email to: SM.FS.LNFRevision@usda.gov

Dear Ms. Millburn:

These are comments on the wilderness review process for the Lolo National Forest Plan revision. I address the process and some specific areas.

Process

The process is inconsistent with the Forest Service Handbook in at least two areas:

1- The *Lolo National Forest Wilderness Process* document states, "Using the most recent, updated national forest system roads data, motor vehicle use map data (roads and trails), and other jurisdiction roads found on the forests, we buffered all roads and **trails that support motorized use, public access, or authorized private access (permit or easement)** by 33 feet." (Emphasis added). Removing trails that currently policy permits motorized use is not allowed or anticipated in the inventory portion of Chapter 70 of the Handbook. Such an approach would fragment large roadless areas.

Indeed, trails have less of an impact than roads. The fact there is an allowance for some Class 2 roads to be included in the inventory clearly indicates trails should be included. The fact that some trails are open to motorized use in S, 393 WSAs—the statute requires the agency to protect the wilderness characteristics or those areas – and some areas recommended for Wilderness in Region I in various forest plans – motorized use on the Fish Lake Trail on the Clearwater National Forest is an example which, until recently, was open to motorized use¹—all demonstrate that trails, even if motorized use is permitted, are not to be excluded from the inventory..

Further, travel plans are tiered to the forest plan, not the reverse. No NEPA analysis on travel planning for the Lolo National Forest made a finding of irretrievable commitment of resources in terms of roadless areas/unroaded expanse/areas with wilderness characteristics. This is unlike NEPA analysis of most timber sales or other development in roadless/unroaded areas that would make that kind of a determination. As such, all trails in roadless/unroaded areas must be included in the inventory and not buffered out.

2- The *Lolo National Forest Wilderness Process* document also states, "Historical sites maintained as developed recreation sites or cabin rentals were excluded features." Removing rental cabins that are only accessible by trail is also an abuse of the Handbook. Most agency administrative sites that are now cabin rental never went through any public involvement process. The RFA process, which may have approved a few cabin rentals, did not go through NEPA. To my knowledge, there has been no NEPA analysis on cabin rentals for the Lolo National Forest and therefore no finding of irretrievable commitment of resources in terms of roadless areas/unroaded expanse/areas with wilderness

¹ A recent lawsuit and legal decision appropriately forced the Forest Service to close that trail to motorized use based upon wildlife habitat standards in the Clearwater National Forest Plan.

characteristics. These areas must be included in the inventory.

Similarly, if the criteria for excluding agency structures (rental cabins or ranger cabins), communication structures (lookouts, radio repeaters, phone lines) were applied to the Bob Marshall Wilderness, it would be riddled with holes or carved up into many pieces in the initial inventory step!² Also, the Forest Service has long argued, correctly so, against non-wilderness public land enclaves in Wilderness.

In sum, the agency is playing a disingenuous shell game with the public. Forest plans that set direction won't even inventory wild roadless areas for wilderness consideration because of trails where some motorized use is permitted or a few agency structures, based upon flimsy if any prior NEPA analysis. Yet site-specific decisions to protect these same roadless areas can't be made because the forest plans didn't recommend them as Wilderness.

Some Specifics

The extant Forest Plan map shows more recommended wilderness as an addition to the Bob Marshall/Scapegoat than does the map on the website (Spread Creek and some surrounding land). It also appears Lake Otatsy is a non-wilderness enclave in the recommended wilderness (a very bad idea). In order to protect grizzly habitat and connectivity, much, much more should be recommended here and in other areas. Adding more to the Selway-Bitterroot and the Great Burn/Kelly Creek country in core areas as well as connected areas is crucial. The Lolo National Forest is important core and connective habitat.

Sincerely,

Gary Macfarlane
Troy, Idaho

² This is not an argument for maintaining structures in Wilderness. Rather, the Forest Service, rightly or wrongly, has apparently determined many administrative structures in Region I are the minimum necessary for preservation of specific areas as Wilderness.