

May 16, 2023

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

Via Email: SM.FS.LFNRevision@usda.gov

Subject: Draft wild and scenic rivers inventory, outstandingly remarkable value framework, and draft wilderness inventory

Dear Amanda,

Thank you for the opportunity to comment during this first official comment period on the Lolo Forest Plan Revision. My family has been long time residents of Mineral County Montana. We live here for the love of all the outdoor recreation. We hunt, fish, hike, and float all over western Montana.

Maintaining, improving, and increasing access to the Forest is essential for maintaining and increasing current and future timber and recreational activities on the Lolo. While I understand and support the need to protect our rivers and provide opportunities for quiet backcountry recreation, I don't believe designating rivers as wild and scenic and utilizing the wilderness designation is always the best solution to manage these resources.

The Wild and Scenic Rivers Act was put in place in 1968 for the primary purpose of protecting rivers in their free-flowing condition from the construction of dams and other impoundments. Since that time, PACFISH and INFISH regulations and monitoring programs have been put in place, Best Management Practices have been adopted and Stream Management Zones and rules have been established to protect our water in its free-flowing condition. With these regulatory programs in place, only those rivers that possess Outstandingly Remarkable Value (ORV) that is unique, rare, or exemplary when compared to others within their region of comparison should be considered for additional protection under the wild and Scenic Rivers Act.

The Wilderness Act was put in place in 1964 and since that time has been used extensively to set aside lands to be managed in their natural state and provide opportunities for a quiet backcountry primitive experience. Other management strategies are available that provide most of these same opportunities while allowing the limited use of mechanize tools and motorized use in some cases to help preserve the desired vegetation conditions and provide limited opportunities for other multiple uses. Backcountry designations are being used in other forests adjacent to the Lolo. They can be tailored to achieve the purpose and outcomes desired for a specific area without the absolute restrictions applied with a wilderness designation. We look forward to upcoming discussions that will provide us with the opportunity to consider these other management tools and opportunities.

Draft wild and scenic rivers inventory and outstandingly remarkable value framework:

The eligibility process was developed with the intent to ensure that the inventory includes all qualified rivers and streams, portrays an accurate representation, and supports a meaningful evaluation of outstandingly remarkable values for potential eligibility in the wild and scenic rivers system. In developing the evaluation framework, the team assigned a large “region of comparison” for the evaluation of outstandingly remarkable values. When we combine the definition of wild and scenic rivers from the Wild and Scenic Rivers Act and the outstandingly remarkable value framework and apply that across the assigned region of comparison, it is difficult to find even one river on the Lolo that has unique, rare, or exemplary characteristics when compared to others. Our experience is that while all the creeks in our area are beautiful none are outstandingly remarkable. For example, the trail to Hub and Hazel lakes has magnificent Cedar groves in the bottom and a great little waterfall on the way in, but so does the trail to Trail Lake up Trout Creek. However, putting these things aside, I support the inclusion of the following rivers in the preliminary evaluation and inventory process:

- The Clark Fork River along highway 135 beginning at the intersection with Tamarack Creek and continuing on where it intersects with the Flathead River. I do not support the portion that begins just south of St. Regis and terminates between Marble Creek and Dry Creek. This portion of river is bland and has nothing outstanding or remarkable.
- I support the inclusion of the Alberton Gorge on the Clark Fork River.
- The Clearwater River
- The North Fork Blackfoot River
- The Dry Fork North Blackfoot River
- Rock Creek

Daft wilderness Inventory:

The Lolo National Forest has a long history of active forest management and timber harvest aimed at supporting the timber industry and contributing to the economies of our rural communities. Most of the land base on the Lolo, including IRA's, has seen decades of active management and road construction that should exclude it from even the preliminary wilderness inventory.

The process of inventorying lands that may be suitable for recommendation to be included in the national wilderness preservation system is guided by the forest service hand book and presumably the 2012 planning rule. There seems to be a disconnect between this process and the true definition of wilderness in the Wilderness Act. We urge you to base your wilderness evaluation on the direction provided by the Wilderness Act.

The Wilderness Act was enacted to protect areas within the United States from expanding settlement and growing mechanization. With over 750 wilderness areas and nearly 112 million acres designated as wilderness in the U.S. since 1964, it seems we have more than achieved the

original purpose and intent of the Wilderness Act. However, I continue to support additions to the wilderness system when applied in the appropriate place, at the appropriate level and most of all, for the appropriate reasons, and then only after all other resource objectives have been given due considerations. With this in mind, I support the inclusion of the following area in the preliminary wilderness inventory:

- I support the area of the Great Burn identified on the plan revision map as proposed wilderness with the understanding that some minor boundary adjustments and concessions may need to be made to provide consistency with the Nez-Perce Clearwater Forest when their plan is completed.

Additionally, I offer the following comments for your consideration:

- The Lolo shares its boundaries with 9 other forests and agency managed lands in Montana and Idaho. The Panhandle, Nez Perce-Clearwater, and Kaniksu National Forests in Idaho and the Kootenai, Bitterroot, Beaverhead-Deer Lodge, Helena-Lewis and Clark and Flathead National Forests in Montana, and the Confederated Salish and Kootenai Tribes Flathead Reservation in Montana. Opportunities should be considered when recommending wilderness in Montana to maintain consistent management direction across boundaries when it is appropriate.
- While we don't believe the Wilderness Act allows any permanent development within a designated wilderness area and we don't support including those areas that have been altered in any way by the hand of man, we recognize the potential for some of these areas to be proposed. In the event that they are proposed, there should be a minimum of a 1 mile buffer on each side of the road to manage for forest health, weed control and, firefighter and public safety.
- The Planning team and the forest should avoid, to the extent possible, including any land in the wilderness inventory that does not allow active forest management. Extensive studies and mapping was done in the development of the Healthy Forests Restoration Act to identify and inventory those lands experiencing declining forest health issues in need of restoration management.
- Likewise, the Montana Forest Action Plan has identified over 9 million acres of forested land that is at elevated risk of infestations of insects and disease and susceptible to the affects of wildfire. The Forest and the Planning Team should acknowledge these studies and Acts and avoid identifying wilderness opportunities that overlap with them.

In Closing, I support the appropriate designations consistent with the plain language in the Wilderness and Wild and Scenic Rivers Acts. IE: Wild and Scenic Rivers inventory should be limited to those waterways defined only as rivers and wilderness inventories should not include any areas affected directly or indirectly by human actions or interventions.

Recognized from the highest levels of the Forest service and our executive branches of government, we are in a forest health crisis with looming catastrophic consequences to the

environment, human health and safety, and our national economy. We must face this challenge head on and acknowledge the recognized need to quadruple forest and grassland restoration activities to reduce hazardous fuels and advance the agency's wildfire crisis strategy.

Sincerely,

Angelo Ververis