May 16, 2023

To: Lolo National Forest Supervisor’s Office

c/o Amanda Milburn, Plan Revision

24 Fort Missoula Rd.

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Via Email: [SM.FS.LFNRevision@usda.gov](mailto:SM.FS.LFNRevision@usda.gov)

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

Dear Amanda,

As a citizen of Mineral County and longtime member of the forest products industry in Montana, I am well aware of the forest health crisis we face across all of the Lolo National Forest. I have a long history of working with our Forest Service land managers on all five of our Ranger Districts to help develop programs and projects aimed at increasing the pace and scale of forest restoration. As a member and Co-Chair of our local collaborative, the Mineral County Resource Coalition (MCRC), and long-time associate of the Mineral County Commissioners and now Natural Resource Advisor for Mineral County, I am acutely aware of the issues that are most important to our citizens and communities in Mineral County. I write today to raise your awareness of these issues and provide input on wild and scenic rivers and wilderness inventories.

I support active forest management that improves forest health, reduces the risk of catastrophic wildfires, makes our forests more resistant and resilient to the effects of fire, improves firefighter and public safety, provides a consistent reliable supply of raw materials to our critically important forest products industry, and contributes to the economic stability of our rural communities. We only need to look at two graphs to understand the important relationship between active forest management and wildfires. Since the mid 1990’s there has been a sharp decline in the number of acres commercially treated and a sharp increase in the occurrence of stand replacing uncharacteristic wildfires. Wildfires today have grown to astronomical proportions consuming homes and taking lives. It is essential that we take steps to protect our homes and communities in the home ignition zone and Wildland Urban Interface but equally as important that we address forest health issues across all our national forests to reduce the threat of stand replacing wildfires that threaten our communities before they reach the wildland urban interface and home ignition zone.

With nearly 90 percent of the land base in Mineral County owned and managed by the Lolo National Forest the businesses and communities within the county are extremely reliant on the resources the forest provides for their economic stability with commercial timber products and recreation the two primary contributing resources. Open access to these public lands via a network of forest roads is essential for vegetation management to improve forest health, and for quick safe access for fire suppression activities. This same access is critically important for maintaining and increasing recreational activities and opportunities on the forest. Existing access roads used by all nonmotorized and motorized forest users have primarily been put in place with dollars provided through timber receipts generated through the commercial sale of forest products. Likewise, maintenance of this road system is almost exclusively provided through active forest management and timber dollars. Wilderness designations contribute nothing to these infrastructure needs and have quite the opposite effect. As stated in the Wilderness Act, “No appropriation shall be available for the payment of expenses or salaries for the administration of the National Wilderness Preservation System”.

The Wilderness Act put in place in 1964 was enacted with the stated purpose to protect areas within the United States from expanding settlement and growing mechanization. Since that time over 750 areas and 112 million acres have been designated as wilderness in the United Sates. In my opinion, this has achieved substantially more than the original intent and goals of the Act.

The evaluation process utilizing the Forest Service Hand Book and 2012 Planning Rule to develop the list and create the map of areas considered for eligibility for wilderness consideration is not consistent with the direction provided within the Wilderness Act. While I understand the forest and the planning team are required to follow this direction, I am not, and I have the flexibility to include only those areas that meet the intent of the Wilderness Act or for other reasons may be suitable for wilderness.

In spite of the staggering number of acres that have already been designated as wilderness and the fact that the wilderness act specifically states that no additional funds can be made available for management of this vast landscape or for the critical maintenance of roads, trail, trailheads, and other infrastructure, I continue to support a limited number of wilderness designations of the appropriate size, in the appropriate place and above all for the appropriate reason. In no event do I believe additional areas should be designated as wilderness simply because we feel the need to protect more areas from expanding settlement and growing mechanization.

* I support the inclusion of the Great Burn proposed wilderness area shown on the map as GB-PW-08 with two future considerations. I believe we should look for consistency across borders. The Nez-Clear National Forest shares its border and the Great Burn area with the Lolo and is several years ahead in the plan revision process. Concessions will probably need to be made with the designation of the Great Burn in Montana to stay consistent with the Nez-Clear’s final decision.
* I support the inclusion of the Bob Marshal addition shown on the map as BMWC-PW-06. This area has the required wilderness characteristics, is supported by the local forest products industry, and is supported by the local collaborative.

While there are other areas such as the Cube-Iron/Cataract and Ward Eagle that don’t meet the required wilderness characteristics, they may warrant other management area designations to achieve other resource uses and desired outcomes. I look forward to a discussion with a far broader scope that includes the opportunity to discuss a wider range of diverse management options.

The eligibility process to inventory wild and scenic rivers was developed with the intent to ensure that the inventory includes all qualified rivers, portrays an accurate representation, and supports a meaningful evaluation of outstandingly remarkable values (OHVs) 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 ORVs. When I combine the definition of wild and scenic rivers provided in the Wild and Scenic Rivers Act, with the ORVs that are unique, rare, or exemplary when compared to other rivers in the region of comparison, I actually found none that met the intent of the Act. While the rivers across Montana are beautiful, when compared to others in the region of comparison, they are very similar sharing the same characteristics. Likewise, I am unable to understand what OHV,s are present in the rivers identified and found eligible for “wild” classification in 1991. With my understanding of the Wild and Scenic Rivers Act and the determination of OHVs, I am unable to understand how any river on the Lolo would be eligible for inclusion in the wild and scenic river system.

In conclusion, the Lolo National forest has historically been actively managed to provide commercial products to the forest products industry and to contribute to the economic stability of our rural communities. I hope the Planning Team and the Forest will continue to prioritize and include these resources in the final decisions regarding the designation of wild and scenic rivers and wilderness areas.

Thank You,

Willy Peck