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April 1, 2024

Submitted via CARA: <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>

Re: Lolo NF Land Management Plan Revision – Proposed Action

Dear Amanda,

Thank you for the opportunity to comment on the *Proposed Action Lolo National Forest Land Management Plan*.

In all directions, the public lands of the Lolo National Forest surround us. The view from my window in Missoula stretches unobstructed from Lolo Peak to Cha-paa-qn. I have hiked, skied, backpacked, or camped in all geographic areas of the Lolo. I have swum, canoed, floated, and rafted its rivers, and soaked in the sounds and peace of its waters. I have watched in awe as a grizzly sow and her cubs swam across the Blackfoot as I rested on its shore. I have the memory of a fall hike to Cliff Lake with my old dog, on what would be her last long walk in the woods.

The Lolo is our home and we take responsibility for it. We give our time and experience to comment on many forest projects and several land management plans on the Lolo and surrounding national forests. We have participated in countless meetings and ranger chats and written comments for this Lolo plan revision process when called upon. We are stakeholders though not always treated as such. We don't necessarily wear hats of a recognized group; mountain bike, snowmobile, OHV, horseback, hunter angler, or trappers club; or stake interest in a particular space on the land; or make a living in the woods product, ranching, mining, outfitter guide or other commodity or recreation-based industry. But we have standing without the hat.

Unlike many who belong to specific interest groups, we understand national forest management transcends our personal uses. It's not about us. We speak for the wildlife and habitat and other values without a voice. We recognize the Lolo holds some of the most ecologically significant public lands in the region. It is the hub that connects the public lands and ecosystems essential to threatened and endangered species, Canada lynx, wolverine, grizzly bear, and the still imperiled wolf. The cold waters that flow from headwater streams is critical to dwindling populations of bull trout and westslope cutthroat trout.

During meetings and written comments, in the interest of wildlife we requested all Inventoried Roadless Areas (IRA) be recommended wilderness, and supported the Northern Rockies Ecosystem Protection Act (NREPA). We requested IRAs be managed to maintain wilderness character and non-motorized recreation year-round. We urged the Lolo to prioritize threatened wildlife and connectivity for grizzly bear and other wide-roaming species faced with climate change. Unfortunately, with little exception we do not see our initial requests at the collaborative table or in written comments reflected in the proposed action. In addition, there are several elements of the proposed plan that fail to meet provisions of the 2012-planning rule. Finally, the proposed action put forth lacks a consistent structure useful to provide clear and meaningful direction for such a critical and what is likely to be a very long-standing forest plan.

## Concerns with the Preliminary Need for Change

### Potential lack of integrity

Before getting into details, we are forced to point out a potential for lack of integrity. In **Section 2.2.3 Social and Economic Sustainability and Multiple Uses**, language in the Preliminary Need to Change (PNC) states the, “2012 planning rule emphasizes the contribution to social and economic sustainability to provide people and communities with a range of social, cultural, and economic benefits. Plans will guide management of National Forest System lands so that they have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future (36 CFR 219.1(c)).”

The choice to highlight this statement under PNC section 2.2.3 (pg. 6) skews and cherry picks verbiage in 219.1(c), which states in full, “The purpose of this part is to guide the collaborative and science-based development, amendment, and revision of land management plans that *promote the ecological integrity* of national forests and grasslands and other administrative units of the NFS. Plans will guide management of NFS lands so that they *are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity* to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future. These benefits include clean air and water; habitat for fish, wildlife, and plant communities; and opportunities for recreational, spiritual, educational, and cultural benefits.” [emphasis added]

While 36 CFR 219.1 (c) does include the “*capacity* to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits...”, a careful reading shows *ecological integrity and sustainability are actually emphasized*. The bias in PNC 2.2.3 has skewed the structure and integrity of this document and the Proposed Action (PA) throughout. [emphasis added]. The 2012 planning rule is structured to present Sustainability (219.8) and Diversity of Plant and Animal Communities (219.9) first. In fact, Section 219.10 multiple use ‘states, “*While* meeting requirements of S. 219.8 and 2.19.9, the plan must provide for ecosystem services and multiple use.” I read that as 219.8 “(a) *Ecological sustainability*. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account...” detailing specific ecosystem, ecological, and physiological parameters and conditions on the landscape. Section 219.8 also provides “(b) *Social and economic sustainability*. The plan must include plan components, *including standards or guidelines*, to guide the plan area’s contribution to social and economic sustainability, taking into account...” (1) Social, cultural, and economic conditions relevant to the area influenced by the plan; (2) Sustainable recreation; including recreation settings, opportunities, and access; and scenic character; (3) Multiple uses that contribute to local, regional, and national economies in a sustainable manner; (4) Ecosystem services; (5) Cultural and historic resources and uses; and (6) Opportunities to connect people with nature.

Nowhere can it be interpreted that the 2012-planning rule ‘*emphasizes*’ the contribution to social and economic sustainability *over* that of ecosystem sustainability as the cherry-picked language in PNC 2.2.3 implies. For accurate context provide the complete content of 219.1 (c) and place it above section 2.2.2. To correct this bias, restructure the content of the PA throughout consistent with that of the 2012-planning rule, beginning with Section 1.5 of the proposed action, additional plan content. This will give the public a more complete picture and context of the purpose of the plan and help employees to better implement it.

### Section 1.2 Previous Plan Revision (2006) under the 2005 Planning Rule

I can add something to the history of the 2006 Lolo Proposed Plan. The Western Montana Planning Zone Forest Plan Revision Team (WMPZ) was initiated in 2003. The WMPZ FPR team put out a streamlined Analysis of the Management Situation per the 1982 planning rule that was dated January 23, 2004. A concise 24-page PA document framed the major needs for change and proposed action was released in the Federal

Register on January 20, 2004, for a 90-day comment period. From what I remember the WMPZ did a comprehensive review under a content analysis process coordinated with a dedicated Enterprise Team. In early 2005 the decision was made to change course from the 1982 to the 2005 rule, which we then used to develop three Proposed Plans, one for each of the national forests. These were released for public comment on April 6 2006. We completed content analysis for the “2006 proposed plans in fall 2006 and published and posted reports on the WMPZ website. Based on public scoping, the WMPZ team was in the process of finalizing the three land management plans in the spring of 2007 when a court ruling based on a national law suit pulled the 2005-planning rule and all plans developed under the 2005 rule.

The Lolo PNC states, “This previous effort provides some insight in the analysis of the management situation (2003) and lists the major themes: Access, integrated ecosystem management, forest products, recreation and outfitter guide management, wilderness recommendations and roadless areas, and wildland-urban interface management.” It states the issues raised provided a foundation for the current need for change. And that “Relevant information from need for change, public comment and issues, and tribal input identified as part of the 2003-2006 planning effort is incorporated throughout this document”. Note a one-page document titled, “Relationship of the 2006 Draft Plan Revision to the Upcoming Revision for the Lolo National Forest” was handed out to participants at public meetings beginning in January 2023 and posted on the Lolo plan revision website. Despite this ‘commitment’, *foundations* provided in the 2006 plan are ignored. There is ongoing interest in the 2006 plan and it has raised by numerous people and organizations in public meetings. **I request that the 2006 Lolo Proposed Plan be included as an alternative and analyzed in full in the DEIS’. This includes a discussion of how the proposed action differs from the 2006 proposed plan for each element and the rational.** The 2006 proposed plan was a significant investment by the American taxpayer, done by a knowledgeable and dedicated team and with full public participation. It deserves to be in the appendix or directly linked.

## 2. 2012 Planning Rule Requirements

The intro to this section points to a major shift from the 1982 rule from an output to outcome focus; based on integrated resource management; and ecological, economic and social sustainability. First, I do not disagree that “An “all lands” approach places forest management in the context of the broader landscape. However, I couldn’t find ‘all-lands’ approach referenced in the 2012 planning rule. Furthermore, I do not support blurring management of federal lands with other entities such as with the state of Montana under Good Neighbor Authority. ‘Public lands in public hands’ is a popular sentiment that politicians claim to support. I’m not certain the public understands the distinction between protecting public land boundaries and allowing access to resource management, in some instances with financial gains to entities other than the U.S treasury. The DEIS and revised plan should disclose and analyze effects of this practice. Second, this section correctly highlights, “Revised plans are rooted in the distinctive roles and contributions of each national forest and emphasize an adaptive management approach using the best available scientific information.” I agree distinctive roles and contributions are a foundational element and it is important to get it right; but the write-up of this section in the proposed action fails to do so. Connectivity is the LNF’s *single* most important distinctive role and contribution to the broader landscape. It is the glue for the all lands approach but not given enough consideration. I’ll address it more in my comments on that section.

### 2.2.1 Resource Integration and Strategic Planning

The PNC (pg. 5) identifies “a need to shift from output-based to outcome-based planning, such as using desired conditions and objectives and placing less emphasis on prescriptive standards.” This concept is repeated in the “fourth bullet, “need to reconsider the management area scheme in the 1986 plan”. The PA does more than reconsider, it applied these concepts in the proposed action to go as far as to provide only five management areas. This is not prescriptive enough. The third bullet, “need to update tactical, prescriptive language with strategic language, identifying land suitability, desired conditions, and objectives, and project design guidelines and standards” attempts to include boundaries but many of the resource sections stop at objectives and fail to offer standards and guidelines, making it difficult to monitor with any measurable accountability.

## 2.3 Required Plan Components

The scheme to place less emphasis on prescriptive plan components conflicts with the 2012-planning rule which requires plan components, including standards and guidelines. An assessment of the *Forest Service's 2012 Planning Rule and its Implementation*<sup>1</sup> by Federal Advisory Committee Members (FACA) concluded, “plan components are at the heart of a forest plan, and the 2012 Rule requires that “every project and activity must be consistent with the applicable plan components” (36 CFR §219.15[b]). Components are to be integrated, written clearly, concisely, and without ambiguity, and *include desired conditions, objectives, standards, guidelines, goals, and suitability-of-land determinations*. Taken together, plan components establish the vision of a plan, set forth the strategy to achieve it, and *provide the constraints of subsequent management*.” [emphasis added] The stated need for change to place less emphasis the more prescriptive components such as standards and guidelines deviates radically from the 2012-planning rule and FACA member’s assessment.

According to § 219.7 (c) (2) “In developing a proposed new plan or proposed plan revision, the responsible official *shall*: (i) *Review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content*. [emphasis added]. (ii) Consider the goals and objectives of the Forest Service strategic plan (§ 219.2(a)). (iii) Identify the presence and consider the importance of various physical, biological, social, cultural, and historic resources on the plan area (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11. (iv) Consider conditions, trends, and stressors (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11.”

The goals and objectives of the USDA strategic plan<sup>2</sup> (U.S. Department of Agriculture Strategic Plan, Fiscal Years 2022–2026) that you referenced, not only have little application to the forest service but are prone to change every few years. More than a couple of bullet points under this section on page 5 of the PNC is needed in order to make such a radical departure from the required components in the planning rule, especially when it conflicts with the FACA members assessment.

The LNF proposes only five management areas including two for wilderness and recommended wilderness, leaving only three other management areas including one for concentrated recreation that represents only 2 percent of the LNF. The neighboring Flathead National Forest, an adopter forest for the 2012-planning rule struck a more workable balance. FNF in Table 21 of the proposed action allocated 7 management areas with descriptive and prescriptive subsets providing 16 compartments. The FNF’s Backcountry MA 5 breaks into four prescriptive designations, which could have been combined into three as one is very minor. General forest MA 6 designates low, moderate, and high intensity general forest management, representing 31% of the forest with most moderate intensity. This follows the 2006 proposed plan that similarly designated three general forest designations with the low intensity exemplifying multiple use specifying not suitable for regularly scheduled timber harvest, but suitable for timber and salvage harvest for multiple-use purposes and to achieve desired vegetations conditions.

The LNF management area scheme lacks nuance providing 56 percent of the Lolo in MA 4 General Forest, with a large portion of it suitable for timber production (regularly scheduled timber harvest). The fact that the percentage of suitable for timber production as compared to timber harvest is not provided, but instead refers the reader to a map in another file demonstrates how unwieldy this ‘scheme’ is.

The lack of definition pertaining to backcountry where most public would probably recreate would be clumsy for the public to understand what they could do and where. The scheme would be difficult for even knowledgeable employees and contractors to implement and open to error. It’s an enforcement nightmare,

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<sup>1</sup> The Forest Service’s 2012 Planning Rule and its Implementation: Federal Advisory Committee Member Perspectives, J. For. 117(1):65–71 doi:10.1093/jofore/fvy055 Copyright © 2018 Society of American Foresters.

<sup>2</sup> <https://www.usda.gov/sites/default/files/documents/usda-fy-2022-2026-strategic-plan.pdf>

would muddy monitoring waters, and the LNF should be prepared for escalating costs for personnel, paper and ink associated with GIS for map production.

Goals and objectives are strategic, and desired conditions aspirational. Standards and guideline components along with suitability provide boundaries to effects on ecological integrity and sustainability. These are most easy to monitor and in a timely enough manner to make adjustments useful for adaptive management. It is a mistake to elevate the ‘strategic’ components at the expense of standards and guidelines. An absence of measurable standards and prescriptive guidelines drives management to an arbitrary condition-based management paradigm, which is not part of the 2012-planning rule.

**The LNF specifically documented that “management areas, geographic areas, and suitability in the 2006 plan WILL provide a launching point for land allocation development.” Again, develop and analyze an alternative around the 2006 proposed plan for the Lolo.**

#### 4. Address Gaps in Current Direction

Much of the preliminary need for change reads like a 21-page laundry list. While section 4.2.1 ecosystem integrity has some good points, the PNC has some glaring failures.

The Lolo PNC (4.2.1 bullet 15) “To establish management direction for aquatic and riparian ecosystems that meets the intent of INFISH and PACFISH and contributes to improvement of aquatic habitat and eventual delisting of fish species under the Endangered Species Act”, is not carried forth in the proposed action and thus does not provide adequate provisions to safeguard aquatic habitat leading to delisting of endangered species. Riparian management zone standards are limited to: riparian width based on stream category; Vegetation management treatments, including the removal of dead or dying trees, shall only occur in the inner RMZ to restore or enhance aquatic and riparian-associated resources; and Project activities within outer RMZs shall be specifically designed to ensure the ecosystem functions of the inner and outer RMZ are protected (managed within reference conditions), but reference conditions. Reference conditions are not clear in the standards, guidelines or included in the monitoring plan.

The PA fails to pick up any gap made by dropping INFISH in other resource areas such as the conservation watershed network, required in the planning rule for watershed that “contains streams currently used by bull trout for spawning or rearing habitat, streams with the most abundant, genetically intact westslope cutthroat trout populations, and streams that provide habitat for aquatic species of conservation concern (including those that serve as a connectivity corridor to the major river systems, those that are currently unoccupied by these species but which are currently providing cold water to them, and those where cold water source is expected to remain cold into the future even with predicted effects of climate change)” Here *Standards (FW-CWN-STD)* are limited to: “01 Management activities in the CWN shall be designed and implemented in a manner that supports the recovery of federally listed species and the achievement of desired conditions and does not degrade them when evaluated at the HUC12 subwatershed scale. Short-term site-specific adverse effects from project activities may occur when they support the long-term recovery of aquatic and riparian desired conditions and federally listed species.”

The Flathead National Forest had a similar need for change. I am herein paraphrasing the Sierra Club comment I authored to the FNF proposed action and including by reference comments of Friends of the Wild Swan related to bull trout, aquatic ecosystems, and native fish habitat. We did not support the FNF PA’s need for change to replace the Inland Native Fish Strategy (INFISH) with new management standards and guidelines then and for most of the same reasons do not support the Lolo NF’s need for change because:

1. The proposed plan components are not equivalent to the protections afforded aquatic habitat and species under the current plan as amended by INFISH. For example the Proposed Action:
  - Eliminates Riparian Management Objectives (RMOs) for key indicators of native fish habitat such as water temperature, large woody debris, bank stability, width/depth ratio and pool frequency that were in INFISH and does not provide a rationale for why RMO objectives, standards and guidelines were removed.

- Does not retain a riparian Management Area allocation or designate a riparian protection zone around streams, rivers, lakes, ponds and wetlands. A guideline (FW-GDL-RCHA -01) referring to default Riparian Habitat Conservation Area (RHCA) widths in the ‘glossary’ is not equivalent to INFISH standards.
  - Lacks or has fewer and weaker standards and guidelines for timber, roads, grazing, recreation, minerals, fire/fuels, lands, and general riparian management and for watershed/ habitat and fisheries/wildlife restoration.
2. The PA disregards the large body of science regarding the impacts of roads on aquatic ecosystems and contains one guideline: “Project specific BMPs should be incorporated into road maintenance activities as principle mechanisms for protecting water resources.” This is not equivalent to INFISH as the FNF claims on page 10 of the Proposed Action. The PA does not contain road density standards and other measures to protect native fish and water quality from known road effects:
- Roads contribute more sediment to streams than any other land management activity.
  - Poorly planned, designed, located, constructed or maintained roads can degrade fish habitat.
  - Roads directly affect natural sediment and hydrologic regimes by altering streamflow, sediment loading, sediment transport and deposition, channel morphology, channel stability, substrate composition, stream temperatures, water quality, and riparian conditions within a watershed. These habitat alterations can adversely affect all life stages of fish, including migration, spawning, incubation, and emergence and rearing.
  - Concentration of surface and sub-surface water, inadequate maintenance, undersized culverts, and sidecast materials can lead to road-related mass movements.
  - Road/stream crossings can be a major source of sediment to streams resulting from channel fill around culverts and subsequent road crossing failures.
  - The 1998 USFWS Biological Opinion for bull trout<sup>3</sup> stated: “there is no positive contribution from roads to physical or biological characteristics of watersheds. Under present conditions, roads represent one of the most pervasive impacts of management activity to native aquatic communities and listed fish species.”
  - Roads in close proximity to streams (< 30 meters or 98 feet) are considered a primary factor resulting in reduced habitat conditions for bull trout<sup>4</sup>. This study indicated that roads near streams could have the same effect on a stream reach as large changes in climate, geomorphology, and management.
  - The Forests in western Montana support 81 percent (or 1,462 miles) of the designated spawning and rearing habitat for bull trout. Given this high percentage, and the potential negative effects of roads on streams, the management of the road system is a principal concern for bull trout.<sup>5</sup>
  - Roads closed with a recontour intersection or rock/earth barrier (closure level III) design criteria requires all stream crossing structures be removed at the time of closure or the mitigation actions for level II roads apply.
3. There is no indication from the PA that the revised Forest Plan will facilitate bull trout recovery. As noted above the PA removes Riparian Management Objectives, allows unmaintained roads to remain with culverts, doesn’t comply with USFWS Biological Opinions, eliminates INFISH standards and guidelines, removes the riparian management allocation and overall allows the Flathead more discretion

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<sup>3</sup> 1998 USFWS Biological Opinion for bull trout

<sup>4</sup> (Meredith et al (2014)

<sup>5</sup> (Biological Opinion of the Effects to Bull Trout and Bull Trout Critical Habitat from Road Management Activities on National Forest System and Bureau of Land Management Lands in Western Montana, 2015)

and less accountability. The Forest Service's actions must lead to recovery of threatened and endangered species – not just survival.

- Bull trout are protected under the Endangered Species Act and critical habitat has been designated on the Flathead. The Flathead can tailor standards and guidelines to habitat features using the best available science from local studies. But it cannot eliminate the INFISH RMOs, standards and guidelines and not replace them with something at least comparable if not stronger.
- Does not honor additional commitments required by the US Fish and Wildlife Service in its June 19, 1998 consultation<sup>6</sup>.

It's been five years since the Flathead implemented its forest plan revision in 2018. Hopefully they have monitoring results that could adequately demonstrate the efficacy of dropping INFISH. Please apply Flathead monitoring results based on bull trout and native fish populations, and stream habitat parameters used as surrogates to INFISH, as an opportunity for an adaptive management course correction if needed before dropping INFISH and replacing by the close to nothing in the Lolo proposed action.

## **General Comments on the Lolo National Forest Plan Revision Proposed Action**

### Document content, structure and ease of navigation

On page 1, the Lolo PA states among the purpose of the land management plan is, “(3) to address the preliminary identified need for change to the existing land management plan.” It then addresses the PNC as an “additional document”. Despite a 20+ page preliminary need for change, the Lolo proposed action offers no synthesis of need for change themes in its proposed action. This is a departure from both the Flathead (an adopter forest) and Custer-Gallatin national forests proposed actions. The C-G offered a simple two paragraph description with a short list of categories. The Flathead PA is the gold standard. Despite the fact that the FNF preliminary need for change was a succinct 9 pages, in its proposed action it provided the public with a six-page synthesis of the major elements that drive the need for change: the 2012-planning rule, grizzly bear habitat management, bull trout and native fish habitat, Canada lynx habitat management, Old Growth Forests, and winter motorized recreation. It included a summary of Inventoried Roadless Areas and the Roadless Area Conservation Rule.

“Inventoried roadless areas (IRAs) are designated under the Roadless Area Conservation Rule (36 CFR 294 Subpart B). The Roadless Area Conservation Rule (RACR) prohibits road construction or reconstruction and cutting, selling or removing timber in IRA's unless a listed exemption applies. For example, one exemption allows the cutting, sale or removal of generally small diameter timber when it is needed to improve threatened, endangered, proposed or sensitive species habitat or to maintain or restore the characteristics of ecosystem composition and structure that would be expected to occur under natural disturbance regimes. The forest plan cannot modify RACR direction. The RACR can only be changed by congressional action or a new USDA rulemaking.

Currently on the Forest, there are 478,754 acres of IRAs, which is about 20 percent of the Flathead NF (refer to figure C-3). The need for changing the management direction in the IRA's from the 1986 forest plan is to remove IRA's from the suitable timber base, and determine the recreation opportunity spectrum classification, the type of travel management desired, and the desired management area delineation. The majority of the IRA's on the Flathead NF are being proposed for backcountry (58 percent) and recommended wilderness (34 percent) management areas.”

By contrast, the Lolo NF provided the public a separate 21-page document of the need for change. The 65 maps in the PA are in Appendix 1 of eleven. There is not even a vicinity map or GA management area maps in the main PA document. As a result, the proposed action is cumbersome to navigate to comment for on the ground direction, at least without privilege of GIS. I noticed forest leadership had a hard copy under different title, 'Need for Change and Proposed Action'. Maybe that included maps in appropriate and useful places.

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<sup>6</sup> 1998 USFWS Biological Opinion for bull trout

## Management Area Strategy

The forest plan revision team under team leader Amanda Millborne and decision-maker, Lolo Forest Supervisor Carolyn Upton have concurred to put out a proposed action that contains only five management areas. We expect that Forest Supervisor will, as the responsible official demonstrate how she complied with her responsibility under § 219.7 (c) (2), in satisfying the 2012-planning rule specific to providing plan components, “In developing a proposed new plan or proposed plan revision, the responsible official *shall*: (i) *Review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content.* [emphasis added]. (ii) Consider the goals and objectives of the Forest Service strategic plan (§ 219.2(a)). (iii) Identify the presence and consider the importance of various physical, biological, social, cultural, and historic resources on the plan area (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11. (iv) Consider conditions, trends, and stressors (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11.”

This strategy is so limited and non-prescriptive, as to be useless without half a dozen overlays for each of the nine GAs. In order to comment the interested publics without privilege of GIS or high-powered printers or extra funds for Kinkos were limited to navigating numerous screens, even if they had access to a computer and a decent monitor. The system of overlays is so complex that without privilege of GIS, it is inaccessible to many members of the public. Myself included without a lot of diligence, time and ink.

As shown in Table 69 the decision to streamline MA suitability is so extreme as to designate 56 percent of the forest in MA 4, General Forest, without differentiating the even the intensity of logging as in both the 2006 WMPZ forest proposed plans including the Lolo and the 2015 Flathead proposed action. MA 4 is so extreme as to have only three desired conditions, two of which are permissive multiple uses related to the transportation system and recreation. And one, “03 Vegetation management activities (including timber harvest, thinning, and prescribed fire) have a role in affecting the composition, structure, and pattern of vegetation and maintaining or trending vegetation towards the desired conditions. Natural disturbances, such as unplanned fire, insects, and disease, are also present in the landscape.” Woopy, the desired condition is ALSO to have natural disturbances on a landscape that covers 1,270,340 acres, as if that is in managements purview. There are no goals, objectives, standards, or guidelines with which to comply with requirement to monitor to inform and adjust course based on adaptive management.

Lolo MA 3 Backcountry which covers 26% of the forest does not different direction for motorized or non-motorized use. Instead, the forest user or those wishing to comment has to access Recreation Opportunity Spectrum maps that are different for summer and winter use. As a result, eighty-two percent of the Lolo falls within management areas where the suitable uses, particularly those associated with access and travel and recreation are like buckshot on the landscape; particularly if one does not have privilege of GIS maps generated for specific areas and custom inquiries.

**Table 69—Management areas (NFS acres) Code Management Area**

1 Designated wilderness	147,880 acres (7%)
2 Recommended wilderness	223,919 acres (10%)
3 Backcountry	585,526 acres (26%)
4 General Forest	1,270,340 acres (56%)
5 Concentrated Recreation Use	35,581 acres (2%)

As an example of the inadequacy of this scheme, the Ninemile-Petty GA, which has the distinction of having the only designated Demographic Connectivity Area for grizzly bear recovery in the existing forest plan (Amendment 44), would be reduced to two MA's. Both Mas 3 and 4 are 100 percent suitable for timber harvest. In MA 4 an unknown or undisclosed number of acres are suitable for timber production. Again, there is scant and immeasurable difference in 100 percent of Ninemile-Petty GA, without privilege of GIS mapping and analysis.

## Distinctive Roles and Contributions

### Section 1.5 Additional Plan Content: Distinctive roles and contributions

Distinctive roles and contributions are a required section of a forest plan. “The 2012 planning rule (36 CFR 219.7(1(ii)) and associated handbook (FSH 1909.12.22.32) require that revised plans describe the plan area’s distinctive roles and contributions within the broader landscape. This content describes roles for which the plan area is best suited, considering the Agency’s mission, *the unit’s unique capabilities, and the resources and management of other lands in the vicinity.*” [emphasis added]

FSH 1909.12.22.32 emphasizes the importance of properly identifying distinctive roles and contributions, “Once described, the plan area's roles and contributions within the broader landscape can serve as a focused foundation or context that should be a unifying concept helping to define the vision for the plan area within the broader landscape. This description is important because it is a source of motivation or reasons behind desired conditions (emphasizes added)....

“The description of the plan area’s distinctive roles and contribution within the broader landscape must not be a list of all the roles of the plan area. Rather, it should reflect those things that are truly unique and distinctive (emphasis added).” In the proposed action, the Lolo rewrote and expanded on this section. However, it reads more as a history and background than distinctive roles and contributions.

Above I requested that the proposed action and the Lolo Forest plan be structured according to the 2012-planning rule, not a random arrangement of provisions but rather systematically structured. In the PA forest wide tribal roles and contributions falls within that structure. § 219.4 Requirements for public participation (a) “(3) *Native knowledge, indigenous ecological knowledge, and land ethics.* As part of tribal participation and consultation as set forth in paragraphs (a)(1)(v) and (a)(2) of this section, the responsible official shall request information about native knowledge, land ethics, cultural issues, and sacred and culturally significant sites.”

Notwithstanding deference to tribal knowledge, placing forestwide ecological and old growth roles and contributions at the end of this expanded section. This is inconsistent with the intent of the 2012-planning rule that emphasizes (§ 219.8) “(a) *Ecological sustainability.* (1) *Ecosystem Integrity.* The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity...”. Section 219.10 clearly states, “While meeting the requirements of § 219.8 and 219.9, the plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area...”

This section of the PA fails to acknowledge Ninemile-Petty as a unique area. The community is known to support conservation easements for wildlife habitat and connectivity. Interagency and NGO cooperation has invested millions in restoring Ninemile Creek damaged by historic mining. NGO’s have invested millions in securing 52 acres at the confluence of Ninemile and the Clark Fork River to facilitate grizzly bear passage under I-90.

## Connectivity

Despite its prominent distinctive role and contribution, connectivity is poorly covered in the proposed action. We understand this topic is being more fully developed or modeled through sources outside of the planning team. Two thoughts on this, for one the proposed action is premature until this important element can be more fully covered. And second there are existing models that could be incorporated. As an example, the Flathead-Lolo-Bitterroot Citizen Task Force and Friends of the Bitterroot submitted, *The Lolo Bitterroot Partnership: A Citizen Plan for Fish, Wildlife and Forests* (June, 2022). It has been endorsed by numerous organizations, scientists and businesses and received over 10,000 signatures from the public. **The Citizen Plan must be considered and analyzed in full as an alternative in the DEIS with connectivity as one of the evaluating criteria.** An emphasis on connectivity is an imperative, not an option.

The LBP Citizen Plan refers to the Lolo-Bitterroot region as ‘**Connectivity Central**’. It is critically located between the three Grizzly Bear Recovery areas. The PA describes the Conservation Watershed Network (CWN) on the LNF as containing streams currently used by bull trout for spawning or rearing habitat, streams with the most abundant, genetically intact westslope cutthroat trout populations, and that provide habitat for aquatic species of conservation concern (including those that serve as a connectivity corridor to the major river systems, those that are currently unoccupied by these species but which are currently providing cold water to them, and those where cold water source is expected to remain cold into the future even with predicted effects of climate change). Given its resource of cold-water habitat in western Montana, the CWN in the LNF is particularly important for the recovery of bull trout.

The Ninemile/Petty GA includes 400 mi<sup>2</sup> of the Ninemile Demographic Connectivity Area designated in the Conservation Strategy for Grizzly Bear in the Northern Continental Divide Ecosystem. Yet the 15000-acre Reservation Divide IRA was not carried forward as Recommended Wilderness per the 2006 Lolo Proposed Plan. In addition, “both the Ninemile and Petty Creek watersheds are important producers of native fish including bull trout and westslope cutthroat trout. There are several important and notable ungulate populations in the Ninemile/Petty area. Petty Creek hosts a robust and health bighorn sheep herd, which the Forest Service has worked with partners to maintain and protect. One of the largest all-native mountain goat herds in the U.S. can be found in the Great Burn area on this GA”. We strongly encourage the Lolo to expand the Ninemile demographic connectivity area to include Petty Creek in this GA and to include sections of the Great Burn in the Middle Fork GA. This should be added as an objective in the Ninemile-Petty GA.

The plan could include a Management Area specific for connectivity as mapped corridors and/or linkage habitat. With the LBP Citizen Plan as a core, other existing areas included in research reports, maps, and models could be incorporated. Among other areas of the Lolo important for connectivity include but are not limited to Monture Creek, North Fork Clearwater, and Summit Divide on the Clearwater Upper Blackfoot. As connectivity central each of the geographic areas is critical. The 1986 Lolo Plan also identified areas of essential grizzly bear habitat that should be included for maintaining or improving connectivity. Consider a Conservation Connectivity Network, similar to watersheds.

An emphasis on connectivity is NOT an option. In 2023 the Whitehouse issued Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors.<sup>7</sup> Recognize the importance and significantly improve the section and carry in all components.

### Old Growth

It is important that the PA opened this section recognizing the importance of the December of 2023 U.S. Department of Agriculture Notice of Intent to prepare an Environmental Impact Statement and announced a proposal to amend forest land management plans to conserve and steward old-growth forest conditions on national forests nationwide. This proposed national plan amendment is in response to Executive Order 14072 and complements other agency-wide efforts including the Wildfire Crisis Strategy. The purpose of these components is to conserve old growth and support the role these forests play in carbon storage, biodiversity, reducing wildfire risk, enabling subsistence and cultural uses, providing outdoor recreational opportunities, and promoting sustainable local economic development.

The PA should be proactive in preparing for the environmental impact statement. More than 200 forest ecologists and climate scientists, including Jim Hansen and Michael Mann, have written the Biden administration urging it to quickly move forward on the president’s commitment to protect old-growth and mature forests on federal lands. The scientists urged an immediate moratorium on logging of federal forests more than 100 years old and requested substantive federal management standards.<sup>8</sup>

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<sup>7</sup> <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>

<sup>8</sup> <https://news.mongabay.com/2024/03/forest-and-climate-scientists-fear-biden-delay-on-mature-forest-protection/>

Absent in the PA plan components is mention of the role of *mature* forests in recruitment of Old Growth to maintain this critical and dynamic ecosystem. President Biden's April 22, 2022 [Executive Order](#) (E.O.) 14072: "Strengthening the Nation's Forests, Communities, and Local Economies" is referenced in this section but not found in literature cited. The scoping letter also lists "Desired conditions for old growth, and estimated progress toward them". The April 2023 report titled 'Mature and Old-Growth Forests: Definitions, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management. Fulfillment of Executive Order 14072, Section 2(b)' is missing...

There is also no emphasis on information gaps in an old growth inventory, or of MA 21 old growth in the 1986 forest plan. While we appreciate a desired condition that old-growth forest conditions are maintained and improved relative to the existing condition over time, the PA lacks an objective to inventory and refine knowledge of existing old growth and mature forests at the landscape scale, and to compare these with MA 21 inventory from 1986. Instead of emphasizing or even mentioning the role of mature forests in recruitment for old growth, the components repeatedly reference '*proactive* management' or '*proactive* stewardship'. This term is disturbingly highlighted only in relation to old growth but not defined or in the glossary.

After attending and listening at many public meetings and ranger chats it is clear that industry at the table is eager to 'get into old growth'. So, I assume *proactive management* is intended to satisfy that desire. Drop or define this term. Instead develop desired conditions, objectives, standards and guidelines that emphasize maintenance condition and function of old growth forests and a plan to rely on mature forests for recruitment into a connected system of old growth forests on the landscape.

The Guideline (FW-OG-GDL) are good but again drop or define proactive management. In the DEIS discuss whether a 'managed forest' fits the definition of old growth. Discuss especially a range of physical and biotic parameters that encompass the old growth ecosystem such as but not limited to amphibians, mollusks, soil and forest floor fauna, and fungi and include these in monitoring.

### Recommended Wilderness

Recommended wilderness is a cornerstone to connectivity. The 1986 plan recommended 223,600 acres in four areas with high wilderness values including: Great Burn (89,530 ac), Bob Marshall Addition (69,250 acres), Selway Bitterroot addition (3990 but dropped 10,670 ac), and Sliderock-Quigg (60,830 ac).

The 2006 proposed plan recommended 283,000 acres in five geographic areas. In total the proposed action recommends 223,914 acres for recommended wilderness. These include:

- 11,100 acres in 2006 proposed plan as compared to 7,204 ac in the proposed action for the Selway Bitterroot Addition in the Lolo Creek GA.
- 77,124 acres in 2006 compared to 86,893 acres in the proposed action in the Middle Clark Fork GA. The 1986 plan recommended 89,530 acres in the Great Burn Hoodoo.
- 15,407 acres in 2006 as compared to 0 acres in the proposed plan in the Ninemile Petty Cr GA.
- 98,606 acres in 2006 as compared to 58,826 acres in the proposed action.
- 81,057 acres in 2006 as compared to 70,995 in the Clearwater Upper Blackfoot GA.

Note that the unit of measure for WSR in the proposed action is miles, which are assumed to be included in the surrounding recommended or wilderness acres. Whereas in the 2006 plan the unit of measure for WSR is acres which are in addition to recommended wilderness. Both the 1986 and 2006 offer more protections.

The 1986 ROD discussed strong support for Cube-Iron Wilcox (37,700 ac) and while this was not recommended, the area was recognized for 21,000 ac for essential grizzly bear habitat but cited high recreation use by local community as a non-qualifying need. "Management emphasis on grizzly habitat, other wildlife needs, visual quality, and roadless recreation in a non-wilderness setting, will provide the best opportunities to manage the vegetation and continue to provide for the grizzly bear and other values." What has monitoring shown in providing for these values? Stony Mountain was also not recommended in 1986. But it was recommended in the 2006 Lolo proposed plan. Please carry this forward in the DEIS and final plan.

Note: In May 2023, I submitted comments on the wilderness inventory and suitability assessment for the Lolo National Forest Forest Plan Revision (FPR). Since I do not see my comments adequately reflected in the proposed action, I'm resubmitting my comments here in their entirety.

“The intent of the inventory is to identify lands that may be suitable for inclusion in the National Wilderness Preservation System. The inventory is the first of four phases. It is intended to be reasonably *broad and inclusive*. Evaluation and recommendation for wilderness occurs in later phases.

Direction in FSH 1909.12 Chapter 70 is based on the 2012 planning rule, in which wilderness values are more inclusive than under the 1982 rule. Section 71 guides criteria to identify and create an inventory of all lands that may be suitable for inclusion in the NWPS. At this early phase, direction is to create an inventory that is ‘broad and inclusive’. For instance, the presence of roads do not eliminate an area from the inventory, but are included or excluded based on FS road maintenance level, status in prior decision documents, whether decommissioned, or are not regularly maintained, etc. Other improvements including vegetative treatments do not disqualify an area from the inventory, if these are considered substantially unnoticeable.

I support the Lolo-Bitterroot Partnership: A Citizen Plan for Fish, Wildlife, and Forests authored by the Flathead-Lolo-Bitterroot Citizen Task Force and the Friends of the Bitterroot. This document has been presented to Carolyn Upton, Lolo National Forest supervisor. The appendix on pages 21-22 includes 38 areas by name for proposed wilderness on the Lolo. I am including this document by reference.

I also support the Northern Rockies Ecosystem Protection Act (S. 1276, 117th Congress) and want all areas on the Lolo National Forest that are identified in this document to be included in the inventory. The purpose of this act is to prioritize wildlands recovery to help restore biological diversity and native species and to establish a system of biologically connected corridors between core ecosystems in the Northern Rockies Bioregion and ecologically significant wild land to the south, and to protect the ecological integrity and contiguity of major wildlands ecosystems and interconnecting corridors identified, among other purposes. I am including relevant sections of this document by reference.

### **Inventory Process**

I understand the inventory process considers existing, relevant information identified during the assessment phase (FSH 1909.12, ch. 10), including information about designated areas (such as inventoried roadless areas), transportation infrastructure (such as road maintenance levels), and past or pending wilderness recommendation proposals. The Lolo National Forest Wilderness Process paper specified previously proposed wilderness areas from the 1986 Lolo National Forest Land Management Plan will be included in the evaluation to ensure consistent documentation of wilderness characteristics as required by the 2012 Planning Rule. Please carry these forward in full.

I trust the team relied on use of management area designations in the existing plan in developing the inventory but it is not clear in the process paper how MAs 11 and 12 were integrated into the inventory. Maintaining the ecological integrity of these areas is critical to a wilderness inventory and evaluation. These also represent the best opportunity to recognize species composition and wildlife habitat that may be under-represented in other parts of the forest.

MA 11 consists of large, roadless blocks of land distinguished by their natural environmental character. They are located throughout the Forest in a variety of terrain and vegetative habitat types. Portions of this Management Area on the Seeley Lake and Thompson Falls Ranger Districts are included in the Forest Service designated essential grizzly bear habitat. This Management Area represents approximately 13 percent of essential habitat on the Forest unroaded blocks. MA 12 consists of the portions of the Forest that have been classified as wilderness or are proposed for wilderness classification.

Lolo Forest Plan Amendment 7 addresses MA 11 and MA 12 specifically. On the Seeley Lake RD the Bob Marshall Wilderness Addition - MA 11 becomes MA 12. Proposed Wilderness boundary change to conform with Lolo National Forest Plan, Record of Decision, page 11 *under Response to Issues, Concerns, and Opportunities*. I want to make sure the boundary and area of MA 12 on the Seeley Lake RD in Monture accurately reflects this change.

### **30X30 direction**

In Executive Order 14008, Sec. 216. Conserving Our Nation's Lands and Waters, President Biden directed agency secretaries, Council on Environmental Quality, and the heads of relevant agencies, to recommend steps the United States should take, to achieve the goal of conserving at least 30 percent of our lands and waters by 2030. Currently only 13 percent (13x21) of US lands have adequate conservation protection to meet this goal (US Geological Survey GAP 1 or GAP 2 status). To achieve 30 percent by 2030, another 17 percent, or ~490 million acres, must attain GAP 1 or GAP 2 status. Wilderness is the only designation that meets GAP 1 requirements. In effect it is the gold standard. For the broader issues of climate change and loss of biodiversity it is imperative that all remaining wildlands are recommended. Include all lands in the inventory and evaluation that could potentially be meet GAP 1 or GAP 2 criteria.

### **Determinations of substantially noticeable do not support a reasonably broad and inclusive inventory**

Determinations of substantially noticeable in Appendix B of the process paper is an arbitrary value. Use of the forest activity tracking system and the time since treatment are not necessarily supported by on the ground conditions. Excluding areas based on these determinations fails to result in an inventory that is reasonably broad and inclusive. Variability on the landscape can influence recovery from disturbance: aspect, slope shape, steepness, elevation, soil type and depth, etc., influence vegetation. While a five-year-old pre-commercial treatment is going to be somewhat visible, it would be less so by the end of the four plus year span of this revision. More intensive treatments may but are not necessarily substantially noticeable following the 40-year timeframe shown in Table 14. A clearcut could resemble a high intensity wildfire, a natural process, especially since the 1986 forest plan had visual quality objectives for vegetative treatments, which if observed would have minimized edge effects and linear features.

As a result, determinations in Appendix B exclude too much area from the inventory of lands that may be suitable and it prematurely determines these will not be evaluated for wilderness characteristics. As a result of Appendix B determinations, the inventory fails to be broad and inclusive, especially given the absence of a more complete assessment early in the process. Areas excluded based on visual appearance should be assessed for consistency in meeting visual quality objectives of the 1986 Lolo Forest Plan. The inventory should note where treatments failed to meet existing objectives and include these as provisional areas with intent to ReWild or restore by mitigating the damage. In any case a complete assessment should have been done prior to this exercise and must be done prior to excluding any otherwise suitable lands from the inventory.

### **Recent and pending projects are eroding potential for wilderness character**

There have been a number of recent or pending fuel treatment projects across the forest in response to the so-called wildfire 'crisis'. Decisions for several projects on the Lolo including Sawmill-Petty on the Ninemile Ranger District have amended the existing forest plan in ways that have or could effect the substantially noticeable determination and/or the wilderness character of the lands. Sawmill-Petty alone would amend 7,076 acres to change Management Area (MA) 27 (land where timber management was not economically or environmentally feasible due to physical features, so these have remained largely untouched) to MA 16 (lands of varying physical environments as determined by soil, slope, aspect, elevation, physiographic site, and climatic factors suitable for timber management), MA

17 (slopes generally over 60 percent and best managed from an economic criteria with a low road density), MA18 (managed to attain a balance of cover and forage for big game through regulated timber harvest), MA 23 (timbered lands on south-facing slopes, with medium visual sensitivity, with developed road systems), and MA 25 (lands with a medium degree of sensitivity, which are available for timber management), or other designations. Some of the area in Sawmill Petty is adjacent to or in the vicinity of the Burdette and/or Petty Mountain inventory roadless areas (IRA). Please assess all project or forest-wide amendments that could have decreased the potential wilderness character. Add to these amendments the trend toward shared stewardship management with potential conflicting values and missions of the forest service with Montana state and other entities. This includes recently paying federal dollars to the MT DNRC to perform project NEPA. Programs such as Good Neighbor Authority with state, county, and other entities under 2014 and 2018 Farm Bills could unnecessarily exclude otherwise suitable areas from the inventory. In the assessment, please address the impact of authorities under shared stewardship on ecological integrity important to wilderness character.

### **Connectivity and Climate Change**

Designated areas including Research Natural Areas, Inventoried Roadless Areas, Botanical Areas, Wilderness Areas are core to connectivity. All such designations should be carried forward in the Inventory. Climate change will likely effect physical and biological processes and attributes within wilderness and compromise the degree to which effected areas function as a refuge and amplify the need for some species to migrate. I urge the Lolo NF to address this threat to ecosystem function by including in the wilderness inventory, any potentially suitable lands that serve to secure functioning habitat for migrating species. Results of a FS evaluation of RACR, “highlight the value of inventoried roadless areas toward maintaining a representative network of relative undisturbed areas that function as conservation reserves supporting a diversity of plant and animal species.” Roadless protection would protect biologically valuable low-elevation roadless areas and complement existing protected areas<sup>1</sup>.

The 5000-acre minimum size criteria is too limiting. The spatial arrangement of remnant unroaded lands and/or restoration of more developed lands is as critical as size in creating corridors f.

### **Threatened and Endangered Species**

The Lolo National Forest is home to several threatened or endangered wildlife and plant species listed under the Endangered Species Act. The inventory should include any areas that protect or facilitate recovery of listed species, including Whitebark Pine. In particular, as a vital conduit for grizzly bear through natural recolonization. The Lolo NF is a connectivity hub that surrounds development and population growth in the Missoula Valley. The public lands of the Lolo NF are critical for connectivity that serves the broader landscape. The Ninemile Demographic Connectivity Area is a key component of the Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy (CS) and all available lands should serve as stepping stones. Sapphire range is also needed for connectivity and any suitable lands should be included in the inventory.

### Backcountry

In the PA, approximately 532,154 acres of IRA’s not recommended wilderness represents roughly 25 percent of the LNF. These IRAs are all subject to provisions of the 2001 Roadless Rule and warrant their own management area designation. Instead, these are lumped into Backcountry MA 3. Unlike the 2006 plan, the PA does not differentiate backcountry as non-motorized or motorized. At the least split backcountry into non-motorized and motorized to facilitate IRA management consistent with the 2001 Roadless Rule. This would help maintain and protect IRA’s integrity for connectivity value.

## Refugia

We appreciate that refugia is included in the forest vegetation section and glossary. However, it needs to be emphasized in disturbance including wildfire and most importantly as an identifying element of any harvest activity. Refugia is a significant information gap. To fill this gap, research, develop and recruit specialists to implement a model. If refugia are functioning, similar to old growth these ‘ecosystems’ should be maintained and allowed to persist on the landscape without entry for harvest of any kind. Consider refugia as an emphasis area and develop applicable plan components to maintain and with a better understanding of the dynamics and site conditions, to improve and restore.

### **Comments specific to the Ninemile-Petty GA – Cassandra Rideg**

We appreciate that the Lolo has done a great job of including and guiding public involvement, but our families are overwhelmingly disappointed in the lack of urgency the NFS, including the Lolo and other government agencies are displaying to meet federal goals of environmental forward thinking. The data is in; we know the steps we need to take, have to take, and have been directed to take, and yet the NFS is not complying with the Executive Order to deliver 30% wilderness into protection by 2030. We haven't even started. This Executive Order was a Presidential directive!

Other NGOs that we cooperate with and are completely aligned with have already made general comments on the entire Draft Plan very thoroughly. Our comments specifically with the Lolo National Forest (LNF) section where we live. The LNF surrounds the Ninemile Valley on three sides. The Ninemile Valley community is a small, primarily agricultural and residential community with tremendous respect and pride for the place we live and the public wilderness lands surrounding us.

Though most of the Ninemile valley was logged in the past, we do have Old Growth stands, and now, there is much Mature Growth Forest. Mature Growth forests were recommended for protection by the Executive Order. The NFS should protect Mature Growth sections. Mature Growth should be considered and included in the new Draft Plan for LNF. If it is, I was unable to find a reference to it. This oversight is not acceptable. These areas are critical to the survival of the forest, flora, fauna, and the ecosystem as a whole.

We have a tremendous opportunity in the Ninemile Watershed to protect connectivity corridors. In recent years, we have seen many examples of this. Outside Glacier National Park and the Northfork of the Flathead River drainage, we had the very first reproductive wolves in Montana. We have Beaver moving in. There is potential habitat for lynx and possibly Wolverine. We also have seen more frequent Grizzly Bear presence. Earlier this week, a confirmed sub-adult Grizzly was confirmed in the valley. Ninemile Watershed is a well-documented, prime wildlife corridor.

Because of all this significant wildlife activity, rural character, and recreation use by the public, I have a difficult time understanding why Reservation Divide has dropped off the current Draft Plan as Proposed Wilderness. It appeared on a map from 2/6/2006 and in the documents used in preparation for the 2012 Planning Rule. This area is virtually roadless, and surrounding areas, such as sections of Ch-paa-qn Peak Road, are in the process of decommissioning roads by the FS. From 2006 to today, these forests have become even more mature than they were then. It is absolutely infuriating that Proposed Wilderness areas have been dropped off the new Draft Plan due to the current environmental crisis. Please correct this significant oversight. The NFS should designate all IRAs areas within the Lolo NF as proposed wilderness.

Respectfully,

/Claudia Narcisco  
Missoula, MT

/Cassandra Rideg  
Ninemile-Petty Geographic Area