I submit the following comments on the Forest Service's notice of intent (NOI) to prepare an environmental impact statement to revise the 1986 Lolo National Forest land management plan (Forest Plan). 89 FR 6088. Although the NOI states the Forest Service is accepting comments through April 1, when I tried to submit them at 7 pm on April 1, 2024, cara rejected them in violation of the NOI.

I fully support the Citizen Plan, "The Lolo-Bitterroot Partnership: A Citizen Plan For Fish, Wildlife & Forests" because the PA falls short in many areas, particularly regarding grizzly bear recovery, riparian habitat conservation, and the management of designated areas. Below are some of my concerns:

The wildfire issue is consuming Forest Service management, which is reflected in its 10-year strategy called "Wildfire Crisis Strategy", without considering the best and most recent available science. In short, active management does not mimic wildfire nor does it provide ecological benefits such as altering wildfire behavior.

LNF failed to include an adequate number of SCC including a broad range of species dependent on certain habitat types to ensure ecosystem integrity and diversity across the planning area. There are also 62 species on the Forest Service List of Sensitive Species in and adjacent to the Lolo National Forest, but only 16 are included in the PA. For example, where are westslope cutthroat, a species of concern to most Montanans?

The PA further weakens INFISH's protections for bull trout etc.

The PA's Recommended Wilderness and recommended wild and scenic rivers are much too little. All that remain should be protected.

 Real protection and recruitment of old growth ecosystems are lacking, in violation of EO 14072.

The PA effects on carbon sequestration and climate change have not been adequately analyzed.

Guidelines are not standards. Standards need to be included in the new Plan.

The new plan will guide forest management for decades to come, and I hope it will be something that protects the Lolo NF ecosystems for future generations. The PA does not appear to do so.