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Thank you for the opportunity to comment on the Lolo National Forest Land Management Plan Revision #62960. We will provide comments regarding this important proposed action, as well as, issues which are consistent with other past, present and proposed actions on USFS managed public lands.

#### 1. NEPA Process vs the use of Categorical Exclusion:

We appreciate your use of the NEPA process to conduct this planning process. Conversely, we do not support using special authorities (CE & HFRA) to circumvent the National Environmental Protection Act (NEPA), as has been done to justify various timber sales on the Lolo National Forest. The comprehensive processes of NEPA has been used successfully to identify comprehensive issues which are of concern to the community and public land managers, in turn, providing a near complete airing of the strengths and weakness of a proposed action. This process is the national standard for public involvement and it should not be circumvented for routine operations (timber sale), regardless of authorities which allow you to do so.

In our experience with interacting with your staff, the use of a categorical exclusion, which simply provides a legal authority in which to proceed without NEPA review, provides too much authority and discretion to public land managers, undergirded by the proposition that many forest species, have or will have, disease. This premise suggests that an otherwise healthy stand of trees to be a [ldquo]hazardous fuels[rdquo] risk, justifying mitigation.

Biologically, most, if not all, tree species will undergo disease processes and could be categorized as a hazardous fuels risk, at nearly any stage of their growth. We feel this authority is too broad and is a red herring, which is simply used to provide authority for an accelerated timber sale.

Prevailing public perception, supported by our own experience with USFS management, operations and as career public lands managers, exposed us to the dominant [ldquo]culture[rdquo] of the Agency, whether real or perceived, to be timber sale / wild land fire management focused. It is often perceived that the above management areas overwhelm your Multiple Use legislative mandate.

We strongly support an emphasis on the long-term and balanced management of forest resources, acknowledging both the importance of biological health and species diversity, as well as, a greater emphasis upon sustainable recreational uses. Indeed, we support the transition from a consumptive use model to an economically sustainable recreational use and visitation model.

#### 1. Resource Values often Not Considered in the Proposed Action Documents; Maintenance of Recreational Resources Managed:

The avoidance of utilizing the NEPA process during local timber sales planning process has resulted in an underreporting of the impacts to natural, historic, scenic, recreational and economic values and interests, thus these issues have been either absent or omitted in local proposals. Curiously, in its place, the USFS often includes comments on the positive economic impacts of the timber sale. We feel the USFS mission, of [ldquo]multiple use,[rdquo] shows little consideration in these proposals for other economic drivers and is narrowly focused upon timber sales.

An underreporting and lack of consideration for the many and varied recreational activities and business[rsquo] which depend upon the quality of the USFS recreational opportunities offered is often the case in planning documents and decision making. We feel an updated plan needs to reprioritize the changing community demographics, needs, desires and recreational trends on USFS managed lands.

Forest recreation is major contributor to area economy and these business endeavors are attractive largely due the manner in which these resources are managed. For instance, the quality of the view shed and management of scenic resources and biodiversity needs greater emphasis. In short, recreation quality is as much of an economic driver as timber sales.

We strongly support the sustainable management of the view shed and spatial aesthetic characteristics. We feel this issue should be provided stronger consideration, especially in light of the recreational and quality of life interests of the community, the impacts upon the historic scene, impacts on recreational-based businesses and managing for biodiversity.

Greater emphasis needs to be given to the quality of facility maintenance provided by the Lolo National Forest.

Often, USFS branding, informational and road signing is in major disrepair. The image of the Agency presented to the public is often substandard. Basic facilities, vault toilets, trail head and trail signing is poorly maintained. Moreover, campsites are often covered with human waste and/or toilet paper, fire pits are full of garbage and trails uncleared. This has to change, as this lack of basic maintenance serves as an impediment to attracting a new era of resource users, in fact, it is a deterrent and calls into question the professionalism of the USFS.

Currently, there is a great reliance upon volunteer organizations for basic trail maintenance. These volunteers are essential, and the quantity could be enhanced with a permanent full-time USFS volunteer / community involvement coordinator position. However, a greater funding emphasis upon both a large / professional trail crew and multiple backcountry ranger positions is needed. The recreational resource is not being adequately maintained.

#### 1. Timber Sale Management:

Numerous previous timber sales have been conducted in the region, as evidenced by the overtly visible scars left behind by unenlightened land managers. Many of these projects promised sensitivity to the view shed, soft edged timber cuts, revegetation, road elimination, etc. However, a casual observation of these projects discloses sharp edged square-patch clear cuts, straight lines, little if any revegetation, a network of unrehabilitated roads and massive unmanaged invasive species. Simply, we have little confidence the USFS is sensitive to anything other than facilitating the sale of timber. The fine points of managing sustainable timber sales, sensitive to multiple objectives and points of view, seem lost in the haste to facilitate timber harvesting.

Specifically, we advocate for using natural processes to manage both plant disease and fuel management objectives, including prescribed and managed natural fire.

Where timber sales proceed, we advocate for attention to the finished product, both in accomplishing the goals of the sale, and proceeding in an enlightened and sustainable manner, with an eye for detail. We advocate for no straight-line cuts, cutting on the contour, use of buffer zones and green spaces near private property, wetlands, drainages, wildlife thoroughfares, and commitment to revegetation, utilizing mosaic of leave trees and cut areas, the rehabilitation and obliteration of roads, not just closures. We feel you can and must do better in crafting contracts for modern timber sales and enforce the details of the contract with an on-site COR.

Because of the past history of timber sale management on this forest and the obvious evidence of unsustainable practices, we strongly encourage you to consider building into your project prescriptions a higher sense of long-term management quality and sustainability.

#### 1. Fire and Fuels Management:

It is frustrating to observe fuels reduction and wildland fire management used as a justification for both circumventing NEPA and [ldquo]at any cost[rdquo] timber sale facilitation. In many cases, specific timber sales would do little if anything to prevent a wildland fire from threatening local area structures and property, yet this broad justification is often used to forge forward.

We feel this process, authority and justification is often used to gain legal authority for fuel reduction and roll over all other legitimate considerations for moderation, sensitivity, utilization of sustainable practices.

#### 1. Proposed Wilderness / Wilderness Designation (Cube Iron / Cataract):

We support consideration for new wilderness lands within the Lolo National Forest, specifically the lands adjacent to the Cabinet Wilderness, known as the Cube Iron / Cataract (CIC). We have traveled extensively within this area and it meets all of the requirements and has all the qualities for designated wilderness protection.

These lands are important recreational resources, are extensively used, and represent a key to transitioning this portion of the forest into a recreational economic driver.

Currently, USFS manages lands which include nearby Scotchman[rsquo]s Peak Proposed Wilderness and the Cabinet Wilderness, with the addition of the CIC wilderness, you could accomplish multiple goals for both resource protection and sustainable economic development.

The Cabinet Wilderness area is small and is problematic as a sustainably sized resource for the resident Grizzly Bear population. This population is important, but isolated. Increasing the size of these habitats through the creation of the CIC wilderness area would improve viability. Of course, there are many, many more vital reasons for creating a new wilderness area on the Lolo National Forest, much of it contained within the values expressed in the 1964 Wilderness Act itself.

#### Conclusion:

In our experience as career public land managers, we have found that working productively and cooperatively with our public land neighbors was imperative for both community buy-in and cooperation. Of course, the authority to govern is granted by the governed. Thus, listening to the concerns of the public, and specifically those directly impacted by Agency proposed action, is paramount.

Candidly, the neighbors in our region regard the USFS with mistrust; created by past performance. This can be changed with a commitment to a balanced and professional approach to land management and an emphasis upon the quality of the finished product. We stand ready to help you in this endeavor.

Thank you for the opportunity comment.

Respectfully,

Robert and Mary Danno