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Organization: Lolo Restoration Committee

Title: Member

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Dear Carolyn and LNF Leadership Team

We thank you and all of the LNF employees for their daily dedicated service in managing the LNF. The Plan revision process has been managed well, and we appreciate the commitment to honest, integrated, transparent public involvement. The background work in developing the assessment, the need for change and the proposed LMP is thorough and commendable. The data analysis, synthesis of the scientific literature, public involvement, and crafting the proposed action is a tremendous credit to all of you, and we look forward to continued engagement through the completion of a Final LMP.

Our comments are intended to increase the utility and clarity of the LMP and are structured around two foci. One is to strengthen the vision of the LMP to address the urgent needs of the Forest with a scale of action and the integrated set of tools that will address the crises facing all of us who live and work in and around the LNF. The second foci are specific suggestions related to the Plan content so the pieces of the LMP, the Revised Assessment, and other supporting documents are more tightly linked to together. We also want to make it readily understandable to the public.

We feel the LMP needs to describe the overarching vision of what the LMP will do over the next 10-20 years. A Forest-wide Goal such as the following could provide a unifying vision:

"The National Forest Management Act (NFMA) and its enabling regulations provide the framework and structure for this LMP. As the revised Forest Plan designs a course of action with partners in surrounding lands and communities, the Forest acknowledges the challenges and provides local solutions to three global imperatives: the Climate Crisis, the Wildfire Crisis and the Biodiversity Crisis. All three are connected in feedback loops which will spiral downward if appropriate action is not taken at all levels of society.

"Forest Wide Goal: Management across the forest will create conditions that are more resistant and resilient to wildfire, and insect and disease epidemics by creating a mosaic of vegetative age classes, species composition and patterns across the landscape and; create stand structures within the forest mosaic to accomplish this. The mixture of treatments will create, protect and maintain the vital community values of:

- *Water quality and quantity for fish, municipalities, irrigation;

- *Fire resistant and resilient communities through partnerships with local community governments;

- *Diverse habitats to sustain plant and animal populations including threatened and endangered, rare or at-risk species;

- *Healthy human communities with cleaner air and reduced smoke from wildfires and recreation opportunities that serve residents and visitors;

- *Vegetation treatments that create forest conditions that can continue to serve as a carbon sink as they sequester carbon dioxide from the air while simultaneously facilitating climate mitigating use of carbon storing wood products that can substitute for fossil carbon intensive materials.

"The Forest Plan's forest-wide direction, geographic area direction, description of potential actions and monitoring are designed to accomplish this integrated goal. Individual pieces cannot be evaluated out of context of the whole vision otherwise it becomes unsustainable."

We understand that the analysis of the effects of the proposed action has only begun and that alternatives to the proposed action have not been identified. The proposed action points us in the direction of healthier ecosystems, however, it is not clear how far in this direction the proposed action takes us. Our cursory analysis based on a few data points such as the extent of vegetative management indicates that the proposed action may not lead us far enough toward the desired conditions listed above. LRC members question whether 22,000 acres of forest treatment a year is enough to correct current conditions in the face of multiple stressors and crises described

above.

To analyze this potential, we ask for the inclusion and analysis of a more aggressive alternative beyond the proposed action. We ask the Forest to consider a Managed Restoration Emphasis Alternative. This alternative would more aggressively improve unsustainable conditions identified by the Revised Assessment, indicated as needs for action in the Preliminary Need for Change, and analyzed in Appendix 3 of the Proposed Action. The details of this proposed alternative are provided in greater detail in the attached enclosures.

In summary we propose an alternative that would more diligently address the needs in the wildland urban interface (WUI), acquired lands, and areas near communities as well as social and economic sustainability. This proposed alternative would advocate a more substantial use of prescribed fire, often preceded by mechanical treatments and/or harvests, to address anticipated hotter and drier climatic conditions in the next 10-20 years. With the inclusion of such an alternative your incipient analysis of alternatives would have contrasting approaches to test the consequences and adequacy of the proposed action.

We understand that a very aggressive managed restoration alternative may require resources beyond the current Forest budget. However, we believe it worthwhile to fully demonstrate to the public (and to Congress) the extensive ecosystem needs on the Forest and the necessary remedial actions.

We believe that this demonstration of needs can be made more apparent by robustly cross-referencing the findings of other analyses associated with the revision process. These include:

*Appendix 3 (Proposed and Possible Actions); which provides a critical review of the revised LMP. It provides the reader with an array of practices that can be used to achieve the goals and objectives. It also candidly discusses the limitation of various actions. We think the Proposed Action should reference the conclusions of Appendix 3 more frequently so the reader can easily make that connection.

*The urgency of many of the plan's goals and objectives could be communicated more robustly by including Tables that compare the current conditions laid out in the in the Revised Assessment with the desired conditions identified in the Proposed Action. Such a cross-reference would help the reader appreciate the transition needed from current conditions to the desired conditions which must be facilitated by the proposed action or possible alternatives. This is not easily understood with the current layout and narrative of the proposed LMP.

The reflections provided above and other issues are further elaborated in comments from several members of the Lolo Restoration Committee (LRC). These comments are appended to this cover letter. They received consensus approval from the Committee.

We have put significant time and effort into these comments, critiques and suggestions. The amount of material including the proposed LMP, the appendices, the purpose and need statement, and the revised assessment is a bit overwhelming, and we acknowledge we may have missed some important details as we crafted our response. If we have, we look forward to your clarifications.

We, the members of the LRC, thank you for your dedication, and we look forward to future interactions as you complete this LMP revision.

Sincerely,

/s/ Michael Schaedel/s/ James Burchfield

Lolo Restoration Committee Co-Chair Lolo Restoration Committee Co-Chair

Member signatures:

/s/ Matt Arno; /s/ David Atkins; /s/ Zach Bashoor; /s/ Mark Hollinger; /s/ Tim Love; /s/ Edward Monnig