

Data Submitted (UTC 11): 4/1/2024 6:00:00 AM

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LNF Land Management Revision # 62960 Comments 4.1.24

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COMMENTS TO THE LOLO NATONAL FOREST (LNF) LAND MANAGEMENT REVISION # 62960.  
PURSUANT TO THE National Forest Management Act of 1976

DATE : April 1, 2024

TO: Forest Supervisor for the Lolo National Forest - Carolyn Ypton

US Department of Agriculture[rsquo]s Forest Service [ndash] Randy Moore .

1. The [ldquo]plan[rdquo] needs to ensure continuity and conformity with the Wilderness Act of 1964: Section 2; Policy; Definition of Wilderness[rsquo] and Use. The [ldquo]Plan[rdquo] and Act should have the same purpose without having an innate bias towards wildlife in favor of [ldquo]special interest groups[rdquo] as does the adjacent tentative plan for the Nez Pierce Clearwater Plan #44089.

1. Mechanized Vehicles cannot be permitted in land designed for Wilderness, Wilderness Study Areas, or other sensitive areas in the Lolo NF. Do not reduce the Great Burn Wilderness recommendation by [ldquo]40,000 acres[rdquo] as the Nez Pierce Clearwater NF did and allow motorized use for it will most certainly promote and encourage motorized "trespass " into the remaining areas. Which enforcement heretofore has been [ldquo]lifeless.[rdquo]

2. Wilderness, The entire area currently recommended for wilderness in the 1987 forest plan (especially the Great Burn area) continues to be recommended for wilderness designation . The [ldquo]sounds[rdquo] of mechanization and trampled earth [ldquo]will[rdquo] compromise the Lynx, Fisher, Wolverine. Wolf and Mountain Goat[rsquo]s suitable habitats. Selway-Bitterroot Ecosystem Grizzly Bear recovery zone is compromised, ongoing, as well by mechanization and altered earth. Include more areas to the Wilderness systems to include the Hoodoo Pass ,Heart & Pearl Lake areas, Reservation Divide IRA should be reconsidered for recommended wilderness and other areas worthy of inclusion.

3. Connectivity. Provide habitat connectivity for Grizzly Bears, Wolverines, large ungulates and endangered species between Greater Yellowstone and Northern Continental Divide Ecosystems. Recommend two (2) Wildlife Corridor tunnels Crossings under I-90 at the Nine Mile Six Mile alternatives. This location is an exceedingly high animal vehicle impact zone. If not the highest between Missoula and Cyr. The neck point of the natural Wildlife corridor between the two Ecosystems.

1.

1. Colorado passed SB 151 this year allocating \$5 million for wildlife crossings and creating dedicated funding for these structures within the transportation department. The state also unanimously passed a joint resolution in 2021 (SJR 21) calling for greater collection of wildlife movement data, a plan for improving habitat connectivity for native species, a report identifying benefits of corridors, and establishment of a working group to develop state policies

2. Florida lawmakers unanimously passed a wildlife corridor law in 2021 (SB 976), allocating \$400 million to protect almost 18 million acres of interconnected natural areas key to the survival of multiple species, including

the endangered Florida panther.

3. New Mexico finalized its wildlife corridors action plan while also dedicating \$2 million to crossings in the 2022 legislative session. Stemming from legislation enacted in 2019 (SB 228), the plan uses ecological data and modeling to identify wildlife-vehicle collision hot spots and critical wildlife corridors for the purposes of improving driver safety and maintaining habitat connectivity for six species of large mammals.

4. Wyoming's legislature dedicated more than \$10 million for wildlife crossings this year. In 2020, the governor issued an executive order establishing a process for wildlife corridors to be designated, beginning with mule deer and pronghorn antelope routes.

5. Infrastructure Investment and Jobs Act (IIJA).

The IIJA directs the U.S. Department of Transportation and the Federal Highway Administration to distribute \$350 million in grants over five years to states, municipalities and tribes for projects that reduce the number of wildlife-vehicle collisions and improve habitat connectivity.

4. Minimize planned human activity in Connectivity points where Grizzly Bears and endangered species have passage so that they are met with wildlife deconflicting measures not mechanized vehicles and recreational opportunities.

5. FS Regional Planning between Regions. All Wilderness planning within contiguous FS Regions should be congruous. Specifically, between the Nez Perce-Clearwater NF & the LoLo NF for the benefit of wildlife. (Endangered Species Act). The Nez Perce -Clear water Plan should be tabled until there is conformity between designated adjacent and connecting uses.

6. Monitoring/Enforcement. Increase implementation of means and methods to enforce for human violations in Wilderness and Wilderness Study area to ensure that the mechanized vehicles and recreational limits are adhered to. Engage the use of Unmanned Aircraft Systems (UAS) to assist the human on the ground enforcement of the recreational limits. Offer elements of the DOD to field train their Group 1, lowest tier group, of unmanned aircraft systems on mechanized interlopers in the winter and summer in the contested sensitive areas. The US Military's Special Operations Units operate in the FS in Montana for training on an ongoing and sustained basis.

1. Land, People and Machines Analysis. Quantitative Comparative data should be provided to illustrate the wants of minority interest of mechanized users vis-a-vis the number of the People who participate in the, non-mechanized access to the Flora and Fauna by both active and passive means.

a. Total land USFS designation; Federal & Regional FS 1 & 4 and by states (MT, ID).

b. Total land area of Wilderness and proposed Wilderness in FS Region 1 & 4 and by state (MT & ID)

c. FS Land area proposed for Mechanization access in the Lolo NF & Nez Pierce Clearwater NF

d. Number of Recreational visits by category: (pedestrian, livestock and mechanized users) to FS land overall, Region 1& 4 (MT,ID) and same for the Plan area.

e. Demographics( Humans) the FS region 1 & 4 and By states.(MT,ID)

f. Licenses #'s: of applicable number of snow machines & dirt bikes in the FS Region1 & 4 immediate areas compared to the states as a whole.( MT,ID,).

g [ldquo]the greatest good for the greatest number( which includes the silent majority)[rdquo]