Data Submitted (UTC 11): 2/22/2023 5:24:41 PM
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Comments: You are not allowed to essentially revise a National Forest Plan with an EA. These are complex issues which must have in the field baseline data. The Lolo National Forest lost a lawsuit in part due to departures from established Forest Plan standards for elk security and thermal cover. These are vital to elk according to the Montana Cooperative Elk-Logging Study (Lyon et al. 1985).

Conditions based assessments are bogus and not a replacement for field-based monitoring and evaluation. The Bitterroot National Forest has announced it will begin a Revision of the LRMP so it must await that process rather than shortcutting it, and broader public involvement by trying to amend/revise the Plan before the official Revision NEPA process.