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First name: Dr. Kari

Last name: Gunderson

Organization:

Title:

Comments: Thank for the opportunity to comment on Wilderness & Wild & Scenic Rivers Inventories as part of the Lolo National Forest Plan Revision process.

I am a 3rd generation Montanan and a wilderness ranger for 35 seasons in the Mission Mountains Wilderness and Swan Front. I teach university/college level courses in wildland recreation management, wilderness planning, agency policy and federal laws pertaining to federally designated wilderness (PL 88-577) and Wild and Scenic Rivers (PL 90-542).

Here are my comments:

Specific to the Wild & Scenic River Inventory:

- *Apply the Climate Shield data as an Outstandingly Remarkable Value.

- *Include all rivers recommended for Wild & Scenic in the Citizen alternative.

- *Apply bull trout and cutthroat trout presence and designated Bull Trout Critical Habitat as Outstandingly Remarkable Resource Values.

- *Include all rivers found to be suitable for Wild & Scenic classification in the 1991 Lolo National Forest Plan Amendment 12 assessment.

Specifics for the Wilderness Inventory:

- *Apply connectivity as an Outstandingly Remarkable Value;

- *Include all roadless areas, including those under 5000 acres. These are vital as secure habitat for grizzly bears and other wildlife and for connectivity.

- *Include areas with past disturbance that is now considered "substantially unnoticeable." These areas are critical to connectivity and will become totally unnoticeable over the life of the forest plan process as long as they remain undisturbed.

- *Include Mature and Old Growth Forest as an Outstandingly Remarkable Value.

- *Include all areas recommended for Wilderness classification by the Citizen Alternative (<https://montanaforestplan.org/images/citizen-forest-plan/Lolo-Bitterroot-Partnership-Plan.pdf>).

Thank you for your consideration.

Sincerely,

Kari Gunderson, PhD.

Wildland Recreation Management