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First name: Greg

Last name: Munther

Organization:

Title:

Comments: For background I was one of five core team members who developed the 1986 Forest Plan. I represented biological resources (wildlife/fish), but the five of us worked closely from 1979 to 1986 on all aspects of development, the current plan which has served both the Forest Service and the public well for nearly 40 years. Because it was one of the first Plans being developed nationally, it had continual scrutiny by both the Washington Office and the Regional Office. It has been a tremendous success. In part because it had a number of management areas with firm lines and standards which were clear and meaningful, whether read by a long term Lolo employees, but also new employees and most importantly the public. It was also developed by a team, each of us were familiar with both the land and the cultural importance of areas, traditions and resource uses by both locals and others.

To date, I have resisted commenting in depth because 1) The new planning process is more aspirational than giving firm directions moving forward, 2) the planning team is not familiar with local resources, uses, culture, and 3) the effort is very heavy on process and very light on a substantive product, and 4) the proposed action is too generalized to provide enough information to provide meaningful comment.

It is apparent the Lolo planning effort will throw away meaningful direction and expectations we could TRUST. I was also District Ranger on Nine mile Ranger District for 10 years working closely with the public, whether it be residents, loggers, visitors, other government agencies and many other interests. The 1986 plan was the line in the sand for what was or was not permitted. The clarity provided continuity of management, and continues to this day.

The new plan will erode TRUST. Especially for the public. It appears now the Lolo will have such generalized direction that a designation for allowing motorized will be overlaid on well established non motorized areas (eg Rattlesnake NRA). The Proposed Action lacks clarity and disposes of previously accepted management areas and meaningful standards. Instead it proposes such broad management areas to largely meaningless. Standards are mostly gone and replaced with merely "guidance", which of course can be rationalized to not be appropriate to a project for example.

Now we, the public, will have to fear that future leadership of the Lolo may indeed use new Forest generalized management areas to allow motorized use in what was previously well established non motorized management areas. New leadership and staff will essentially have an open book as to what may occur on nearly anywhere. Of course congressionally designated Wilderness will have appropriate "direction", but the majority of the Forest will be at the whim of the current management team.

A Forest Plan should provide direction specific enough that regardless of who is reading it, whether it be existing employees, future employees, or the public, will all agree on exactly what is expected on the land. Instead I see aspirational, pie-in-the-sky fluff. Certainly squishy enough that no lawsuits could be successful. Of course, that is the intent of the new Forest Planning Process.