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Title:

Comments: I would like to start out by stating the request by USFS staff for commenters to utilize the numbered polygon maps has resulted in a significant loss of time to commenters through the failed attempts to locate these numbered polygon maps. After several hours of searching, I can only assume USFS personnel failed to create these maps or failed to adequately inform the public of their location. Additionally, the maps provided for the public comment process are inaccurate, inconsistent, and generally unusable as a basis for comments. As an example, how do designated primitive areas change between winter and summer maps? Are these primitive areas seriously changing with the change of season? How can the public trust the data or trust the process when the foundational data is so inconsistent? While I have read the leader's comments from March 12th, stating the erroneous documentation should not hinder the commenting period and the decision to continue with this factually false data will provide more consistency to the process and eliminate confusion, I highly disagree with this statement as it will not promote consistency, but perpetuate false and misleading communication with the public. This is akin to recognizing the lug nuts are loose on your vehicle but choosing to continue driving it because you don't want to pause your vacation to fix the problem. How can you expect the public to comment on proposed actions if the proposed actions themselves aren't even accurate? What are you actually proposing? While I may not have any comment on the erroneous documentation, I may have something to comment on if the documentation was accurate.

As it currently stands, it appears the USFS is proposing to eliminate nearly 50% of the motorized winter recreation area in the Lolo Pass area and I strongly oppose further restricting this area. It is my understanding this was not the intent of the proposed maps but without accurately created documentation, how am I supposed to respond accurately or trust that this egregious reduction won't make it into the final documentation? As a fellow civil servant, I am wholeheartedly ashamed to see such a process continue without corrections being made, before requesting comments. If my team were to produce such inaccurate public documentation, our administration would demand corrective action before the continuation of any regulatory-altering activities. USFS personnel are obligated to provide accurate information to the public, regardless of whether or not it may or may not cause confusion. It is the responsibility of USFS staff to remedy their mistakes and take the necessary steps to rectify the damages they have caused. While I am keenly aware we are all human and we make mistakes, it is a compounding mistake to knowingly ignore those mistakes without pumping the brakes and fixing them.

In addition to the admittedly factually incorrect maps, the provided maps lack a significant level of detail and correlation to existing maps. I would like to see an overlay of existing maps and the proposed maps. Part of this, and any public process, is to ensure the public is able to decipher the provided information. There is no simple way to determine what changes are being proposed to either summer or winter recreation, in any of the areas. I would like to see an overlay of current and proposed designations, along with a total land area differential. How much recreational area is being lost and/or gained by each recreational group, both summer and winter? As the owners of this land, the public deserves full transparency during the process. I am confident the USFS is fully aware of the public demand for transparency from government agencies and I feel additional analytical data would provide some of this.

As I am not currently comfortable in providing specific feedback due to the inaccurate map data, I would like to address some overarching topics regarding forest recreation as a whole. Continuity of and connectivity of recreation areas is something I have struggled with on multiple occasions, both during winter and summer seasons. An example of this situation is trail use designation which causes disconnection of otherwise connected areas. I have seen this multiple times in which the only thing stopping hundreds of miles of trails from being accessible from another set of hundreds of miles of trails is a 1 mile trail with significantly restricted use such as only being dirtbike accessible. By simply altering the designation of this one mile of trail, the connectivity of two

identically designated recreational areas would be entirely accessible. While we actively pursue connectivity of wildlife ranges to ensure our forest friends can navigate across vast geographical areas, we fail to analyze and provide the same opportunities to our recreational users. Both motorized and mechanical recreationists suffer from this situation. Hart Lake Loop trail area, near Superior, is a second example, as it being designated proposed wilderness will cause a disconnect between recreational areas unless an exemption is provided, as was done on the Nez Pierce portion of this trail.

In general, I am opposed to any further restrictions to motorized use across the Lolo National Forest. The further reduction of these recreational areas places an additional impact on the land due to concentrated usage. This applies to non-motorized use as well, but reduction of non-motorized use areas doesn't, historically, seem to be a risk from the forest plan processes. I would like to see data on the total land area across the Lolo National Forest for the various recreational use types. I would also like to see the per capita usage of those land areas to clearly see how much Forest Service-managed land is allocated to each user within the various recreational use type groups. I suspect this would be invaluable data for the public to see how many users of each recreational type group there are and how many acres are allocated to each of them.

All areas of the Great Burn proposed wilderness area should also be reverted back to historical usage as there has been no congressional approval as wilderness area. Under the provisions of the 1964 Wilderness Act, areas not congressionally adopted as wilderness shall be reverted to historical usage 10 years after the initial designation of RWA. The Great Burn area initially received RWA designation in the 1980's and has received no congressional designation as a Wilderness area and is therefore illegally being managed as wilderness.