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First name: Marcia

Last name: Hogan

Organization:

Title:

Comments: April 1, 2024

To: Lolo Plan Revision Team

Re: Comments on the Preliminary Issues for the Lolo Forest Plan Revision.

I reviewed the preliminary issues as recommended in the Jan. 31, 2024, scoping letter.

It's my impression the Forest Service is first and foremost focused on how to manage wildfire. There is widespread recognition that we live in a fire-dependent ecosystem and forests and communities have been negatively impacted by its exclusion. How to accommodate wildfire dominates day-to-day land management and needs to be central in forest planning. Wildfire receives prominence in Preliminary Issue #5: Interface and Lands Near Communities, however, the ecological importance of fire needs prominence in Preliminary Issue #1 Ecological Integrity and Management and Preliminary Issue #4 Recommended Wilderness.

I encourage the forest to identify large blocks of land where wildfire can burn relatively unimpeded. It makes sense to center these blocks around designated and recommended wilderness because wilderness supports the use of wildfire.

*Wilderness prioritizes naturalness and it's where the Forest Service has allowed lightning-ignited fire to burn.

*Wilderness fire management has informed and pushed fire management policy beyond suppression for almost half a century.

*Wilderness provides decision-makers with a strong incentive and resource rationale for allowing wildfire to burn (albeit a complex evaluation under any circumstance).

While the mostly moderate-to-stand-replacing fires that characterize the Lolo's mid-to-high elevation forests can pose threats to communities, wilderness provides the best opportunity for fires to burn due to its relatively remote geographic location. I support the use of prescribed fire and fuel treatments, but they are a drop in the bucket on a two-million-acre forest.

The ongoing forest planning process needs to identify large landscapes where wildfire can burn without presenting great risk to people. Fire suppression only leads to more severe fire as underscored once again in the most recent University of Montana study titled "Unintended Consequences of Fire Suppression."

I recommend the Lolo Forest Plan Revision:

Give prominence to the important ecological role wildfires play in fire-adapted ecosystems in Preliminary Issues #1 and #4.

Examine the history of large fires since the 1986 Final Forest Plan. What was the size and location of large fires? Did they occur in Management Areas 11 and 12?

Create large landscapes responsive to wildfire by grouping roadless areas and recommending them for wilderness: the Hoodoo and "String of Pearls" roadless areas; the Cube Iron-Silcox, Cataract and Sundance Ridge roadless areas; and the roadless areas in Rock Creek.

Expand designated wilderness to the greatest degree possible and more than what is in the proposed action.

The wildfire management crisis is the most confounding and consequential issue confronting western national forests. I recommend the Lolo put wildland fire front and center in forest plan revision and look to designated and recommended wilderness as the places most receptive to wildfire.

I applaud the Lolo for not defaulting to fire suppression in designated and recommended wilderness. The Lolo has a history of managing wildfire in such areas...the 1988 Canyon Creek Fire, 2000 Monture-Spread Fire, 2015 West Fork Fish Creek Fire, 2017 Lolo Peak Fire to name a few. Please use the forest plan revision process to build upon the past and continued use of wildland fire afforded by wilderness.

Marcia Hogan

P.S. I'm an avid cross-country skier and the sport did not feel sustainable this winter :-). The forest will need to provide more opportunities at higher elevations for groomed cross-country skiing if it is to have a future. The upper Miller and Lolo creek drainages and Gold Creek off the Blackfoot River are possible areas around Missoula.