

Dear Lolo N.F. Plan Revision Team,

Here are our thoughts and requests for your consideration regarding the Wild and Scenic Rivers Draft Preliminary Evaluation and Outstandingly Remarkable Values Framework.

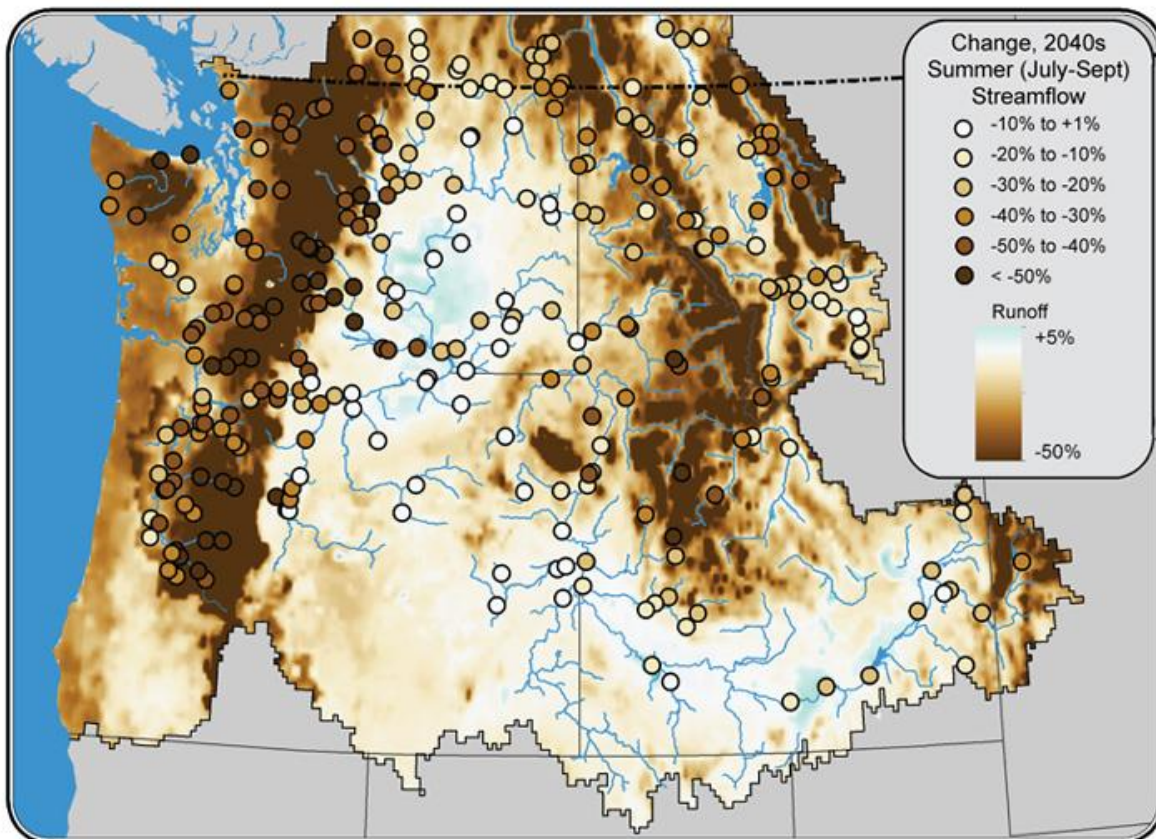
Our comments fall into 3 broad categories:

1. The Framework—Step 2

As part of Step 2 in the over-all Wild & Scenic River process, we ask that you add one additional criterion to the Framework to Evaluate Outstandingly Remarkable Values. Cold water refugia is ever more critical to the survival of many of our native aquatic resources. According to the U.S. Environmental Protection Agency, western Montana's late summer stream flows are predicted to decrease by 30%-40% by the 2040's. The above information is from the following graphic found on this link:

[Climate Impacts in the Northwest | Climate Change Impacts | US EPA.](#)

Reduced Summer Flows



Streams with less water and less shade or shelter will warm more quickly, providing additional stressors on native aquatic resources, such as fish and amphibians. In this changing world, known cold water

sources should be considered as an Outstandingly Remarkable Value and used to further screen all streams going into Step 3 of the Wild & Scenic River process.

2. Climate Change

We understand that the 2012 Planning Rule requires an increased emphasis on and awareness of Climate Change. The FAQ sheet that addresses Climate Change says: “The revised plan will focus on re-establishing or maintaining the composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions.”

Please include the following paper in your Lolo revision analyses as a source included in your best available scientific information.

Donovan A. Bell, Ryan P. Kovach, Clint C. Muhlfeld, Robert Al-Chokhachy, Timothy J. Cline, Diane C. Whited, David A. Schmetterling, Paul M. Lukacs, and Andrew R. Whiteley. 2021. Climate change and expanding invasive species drive widespread declines of native trout in the northern Rocky Mountains, USA. *Sci. Adv.*, 7 (52), eabj5471.

This paper can be downloaded from this link [Climate change and expanding invasive species drive widespread declines of native trout in the northern Rocky Mountains, USA \(science.org\)](https://www.science.org/doi/10.1126/sciadv.abe5471).

Some quotations from this paper (pages 1 & 2) follow:

“Using 21,917 surveys collected over 30 years, the referenced paper shows that climate-driven increases in water temperature and decreases in summer flow likely caused declines of bull trout, while climate-induced expansion of invasive species largely drove declines of cutthroat trout.

...future predictions suggest that the distributions of invasive brown trout and rainbow trout will substantially expand west of the Continental Divide (21 and 19%)...”

This paper highlights the importance of cold water for native fish survival.

Most of the leading scientific organizations worldwide have issued public statements that climate-warming trends over the past century are likely due to human activities and the current planning rule requires that climate change is considered as a system stressor.

Again, with the above in mind, we ask that any known **cold water sources**, which likely includes most headwater streams with a northerly aspect, **be one of the more important outstandingly remarkable values** driving the decision whether a stream or river segment would be eligible. These cold water refugia will best be protected by eligibility that will favor our two at risk native trout; bull trout--ESA threatened, and westslope cutthroat trout--Montana species of greatest conservation need. Protecting these cold water sources will directly benefit a host of amphibian and invertebrate species by maintaining healthy aquatic and riparian ecosystems that support terrestrial and aquatic species as well as recreational fishing that is so important to Montana’s economy, allure, and quality of life. Streams that are predicted to serve as cold water refuges are identified in the American Rivers Wild & Scenic River Eligibility Report, Lolo and Bitterroot National Forest, September 2022. American Rivers is an expert organization with the staff and expertise to make informed quantitative recommendations. We

support the recommended river and stream segments made in the American Rivers Wild & Scenic River Eligibility Report.

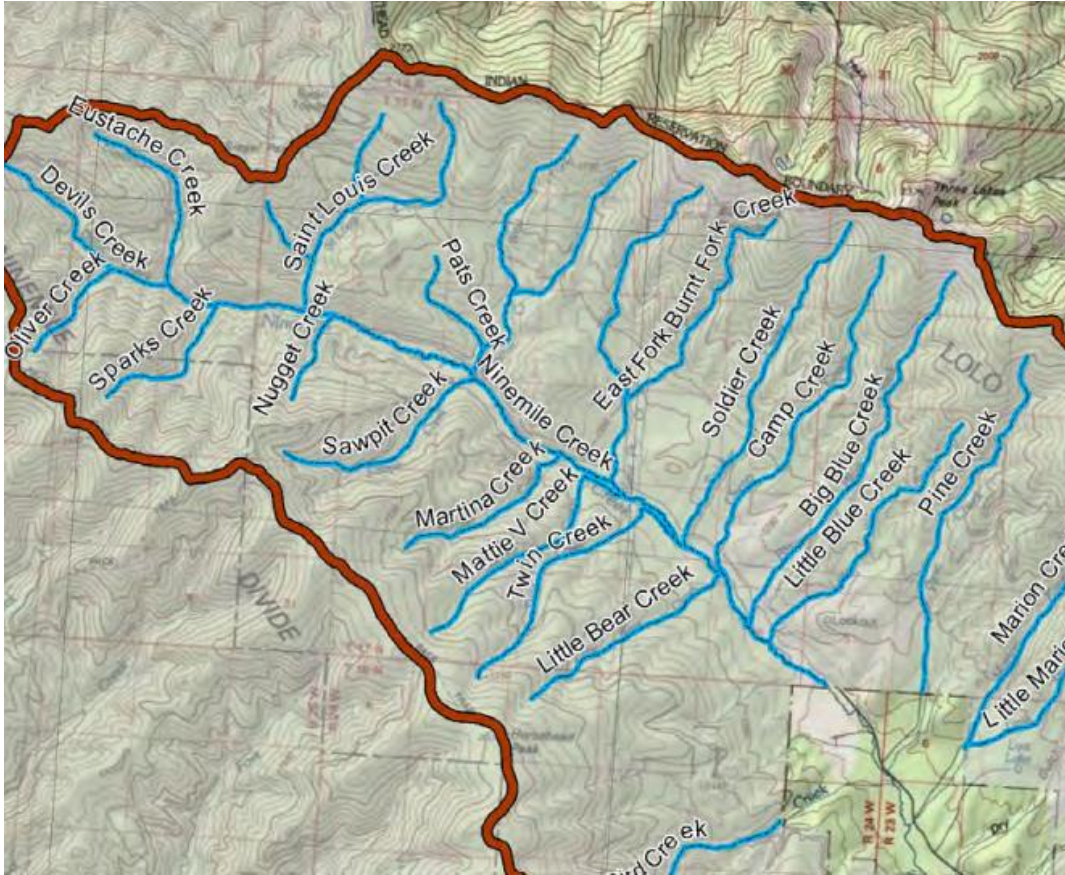
The Idaho Giant Salamander (*Dicamptodon aterrimus*) merits special protection as it is a Montana species of concern with a state ranking of S2. Streams occupied by this species should be protected. According to the Montana Field Guide ([Idaho Giant Salamander - Montana Field Guide \(mt.gov\)](#)), “Potential threats for the species across its global range probably apply also to Montana populations. Because Idaho Giant Salamanders were only recently confirmed in Montana, the extent of their distribution and conservation status are still largely uncertain. However, because their distribution appears to be limited to a handful of headwater streams adjacent to the Idaho border, they face a variety of risks associated with limited distribution. The range of the Idaho Giant Salamander in Montana has likely been reduced during the last century through habitat fragmentation from logging of mature and old-growth forest types, wildland fire and fire management activities, road building, placer mining and the use of piscicides. The species is more likely to occur in road-less areas (Sepulveda and Lowe 2009), so changes in land use over the last century have undoubtedly impacted this species.” Montana’s State Wildlife Action Plan 2015 ([*MT SWAP FINAL submitted 9 January 2015 small.pdf](#)) on page 127 say’s this about the distribution of Idaho giant salamander: “All records are from headwater streams and lake outlets in Mineral County.” On page 129: “Climate change is a future threat to this species by altering habitat characteristics (e.g., air and water temperature, precipitation timing and amount).”

Because of the Idaho giant salamander’s status and limited distribution, streams that have known populations of these salamanders should be considered for eligibility because of their outstandingly remarkable values for wildlife.

3. Wild and Scenic River segments to carry forward

As you work your way through Step 3 of the process, we wish to acknowledge the work, knowledge, and public participation that has come before us in considering streams eligible for Wild & Scenic River protection. Adding cold water refugia as an additional criterion, we also ask that you **adopt all of the recommendations from the 1991 eligibility study (Lolo National Forest Plan Amendment 12); as well as the recommendations for eligible streams from the 2006 plan revision effort; and the recommended river and stream segments made in the American Rivers Wild & Scenic River Eligibility Report.**

Finally, we would recommend the **upper section of Ninemile Creek, above Pine Creek, and its tributaries be included as eligible because of its outstandingly remarkable values for wildlife.** This area of the Ninemile drainage is protected from trapping for beavers and river otters, both dependent on aquatic environments. Moose are protected from hunting in the entire Ninemile drainage. These species protections are unique to the upper Ninemile drainage and are not replicated anywhere else on the Lolo National Forest nor anywhere else in Western Montana that we’re aware of except for within Glacier National Park. This area is also within the Ninemile Demographic Connectivity Area for grizzly bears, is adjacent to the Reservation Divide Inventoried Roadless Area, and provides habitat for most of the wildlife species that are on the Lolo National Forest. Following is a map showing the portion of the Ninemile drainage and the stream names that have these outstandingly remarkable values for wildlife.



Watershed above Pine Creek that have outstandingly remarkable values for wildlife.

Thank you for considering our comments. We appreciate your excellent outreach and welcome your correspondence and feedback.

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Ninemile Wildlife Workgroup (Chair)

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