



Lolo National Forest  
24 Fort Missoula Road  
Missoula, MT  
59804

Re: Lolo National Forest Plan Revision Draft Wilderness and Wild & Scenic River Inventories

May 15, 2023

Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=62960>.

Dear Forest Plan Revision Team,

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association), The Wilderness Society, and our members in response to the draft wilderness and Wild and Scenic River inventories for the Lolo Plan Revision. We are grateful to have the opportunity to provide feedback during this early step in forest plan revision and appreciate the transparency and public engagement opportunities the Forest Service is providing for this process. We would also like to thank the Forest Supervisor and Plan Revision Team for extending the deadline and providing a full 30 days to analyze and comment on the wilderness inventory data.

## **I. Organizational Backgrounds**

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana has participated in the development of every national forest plan and subsequent revisions for national forests located within the state of Montana. Wild Montana and our thousands of members and tens of thousands of supporters are invested in the ecological integrity and quiet recreation opportunities on public lands, as well as the impact of climate change on Montana's wild places.

Since 1935, The Wilderness Society has led the effort to permanently protect nearly 112 million acres of wilderness in 44 states. The Wilderness Society's roots run deep in the Lolo National Forest, going back to founder Bob Marshall's time spent in western Montana. The current work of The Wilderness Society is rooted in community led collaboration, empowering local voices for



the ecologic and economic vitality of their home. The Wilderness Society has defined two priority landscapes for our work in the Northern Rockies—the Crown of the Continent and the Great Yellowstone/High Divide; the Lolo National Forest is represented in both landscapes. Wilderness Society staff have deep technical knowledge and have conducted research within Montana and across the nation. In the past decade, The Wilderness Society has actively engaged in all three Montana national forest plan revisions completed to date under the 2012 Planning Rule.

## **II. Draft Wilderness Inventory**

We applaud the Lolo National Forest’s efforts to involve the public in the development of the wilderness inventory and for making effective use of technology by posting data and interactive maps to the forest plan revision webhub. The Forest Service Handbook states that the wilderness inventory was “intended to be reasonably broad and inclusive,”<sup>1</sup> and we believe that overall, the Lolo National Forest has followed this directive. We were pleased to see that the planning team included all of the forest’s inventoried roadless areas (IRAs) and previously recommended wilderness areas from the 1986 Lolo Forest Plan in the inventory. This provides a great starting point in the recommendation process, although we fully appreciate that not all of these areas will be carried forward after the evaluation phase.

Nonetheless, we would like clarity regarding some of the language and level of detail provided in the Wilderness Inventory Process paper.<sup>2</sup> The paper states the inventory will exclude motor vehicle use map (MVUMs) road and trail corridors with a 33 foot buffer zone.<sup>3</sup> We would like to point out that the Chapter 70 Handbook describes that MVUM roads are excluded from the wilderness inventory process, but does not mention the exclusion of “trails.”<sup>4</sup> Instead, Section 73 of the Handbook states that human-made features, such as trails, are analyzed for potential exclusion during the evaluation phase. Due to the scale of the draft inventory map provided, it is unclear where these “D-1 MVUM Trails 2020 w/ 33 ft buffer” are located and if areas may be improperly excluded at this stage of the process.

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<sup>1</sup> *Land Management Planning Handbook*, Chapter 70, FSH 1909.12 (2015).

<sup>2</sup> Also for the sake of accuracy heading into the evaluation, we’d like to mention two typos. In Section 1.2 on page 4 of the paper describing designated wilderness, the acreage should be 147,856 per Table 1. Additionally, in the narrative for the Great Burn proposed wilderness, it states “GB-01 and GB-02 are small interior parcels” and we believe this should say “GB-01 and GB-PW-INT-01 are small interior parcels.”

<sup>3</sup> *Lolo National Forest Wilderness Process: 1.1 Criteria for developing the preliminary inventory*, Lolo National Forest (2023), at 2.

<sup>4</sup> *Land Management Planning Handbook*, Chapter 70, FSH 1909.12 (2015), at 71.22.



Further, the Wilderness Inventory Process paper did a thorough job of explaining which types of vegetation treatments and ages were considered “substantially unnoticeable.”<sup>5</sup> However, without being able to analyze which treatments occurred at specific locations across the forest, it is difficult to discern whether or not the excluded vegetation treatment polygons raised any issues for us. Going forward, we would request additional information about the type of vegetation treatment each polygon on the inventory map shows and would ask that the information become available at least during the wilderness evaluation phase. We are especially interested in learning more about areas of the map that are IRAs or previously recommended wilderness areas that contain these vegetation treatment polygons—for example, the vegetation treatment polygon around Sqaylthkwum Creek in inventory polygon 10 and the two western vegetation treatment polygons in inventory polygon Slide Rock SL-PW-10.

Lastly, while the next phase of evaluation is based on wilderness characteristics from FSH 1909.12, each characteristic requires the consideration of factors and the use of field data. Before going into the evaluation, Wild Montana and The Wilderness Society would appreciate the opportunity to provide input and suggestions for those evaluating criteria.<sup>6</sup>

### **III. Wild and Scenic River Outstanding Remarkable Values.**

Intact rivers on public lands, like the ones contemplated under the Wild and Scenic Rivers Act, are greatly important to overall ecosystems and have significant potential to help protect against a changing climate. To be eligible for Wild and Scenic River designation, a river segment must be free-flowing and contain at least one “outstandingly remarkable value” (ORV).<sup>7</sup> ORVs include scenic, recreational, geologic, fish and wildlife, historical, cultural, or other values that must be unique, rare, or exemplary and are related to the river itself.<sup>8</sup>

We appreciate the opportunity to provide feedback on the preliminary Wild and Scenic River framework and believe “climate refugia” should be considered as an ORV in this Lolo Forest Plan revision process under the “other” category to reflect the importance of the resource and ability to adapt to the changing times. Climate refugia are “areas that remain relatively buffered from contemporary climate change over time and enable persistence of valued physical, ecological, and socio-cultural resources,” including critical habitat and migration corridors.<sup>9</sup> The climate refugia ORV is not only about cold-water temperature, but also includes the

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<sup>5</sup> *Lolo National Forest Wilderness Process: Determining substantially noticeable vegetation treatments for the draft wilderness inventory*, Lolo National Forest (2023), at 1.4 App’x B.

<sup>6</sup> Other forests in Montana, like the Flathead National Forest, have elicited this type of feedback from the public before going forward with the evaluation.

<sup>7</sup> 16 U.S.C. § 1271 (1968).

<sup>8</sup> *Id.*

<sup>9</sup> Morelli et al., *Managing Climate Change Refugia for Climate Adaptation*, PLoS ONE 12(1): e0169725 (2017), <https://doi.org/10.1371/journal.pone.0169725>.



considerations of connectivity, habitat persistence, migration routes, water quantity, and water quality. These considerations will only continue to be more important as the climate changes. For the future analysis phases, we also recommend that the Lolo National Forest staff closely look at existing climate refugia data and modeling for native trout, such as the information that has been collected by the Rocky Mountain Research Station.<sup>10</sup>

#### **IV. Conclusion**

We appreciate the opportunity to provide this feedback and look forward to engaging with you in the next steps of the Wilderness evaluation, assessment, and other upcoming forest planning processes. Please do not hesitate to reach out to us at any point.

Sincerely,

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<sup>10</sup> See *Climate Shield Cold-Water Refuge Streams for Native Trout*, USDA Rocky Mountain Research Station: Water and Watersheds Research Program, <https://www.fs.usda.gov/rm/boise/AWAE/projects/ClimateShield.html>.