



May 15, 2023

Lolo National Forest
Attn: Amanda Milburn, Revision Team Leader
24 Fort Missoula Road
Missoula MT 59804

Sent electronically to: SM.FS.LFNRevision@usda.gov

Re: Comments on the Draft Wild and Scenic Rivers Inventory and Outstandingly Remarkable Value Evaluation Framework for the Lolo National Forest

Dear Ms. Milburn,

On behalf of WildEarth Guardians, please accept the following for our comments regarding the Draft Wild and Scenic Rivers Inventory and Outstandingly Remarkable Value Evaluation Framework, and recommended wilderness. Guardians officially supports Citizen Plan For Fish, Wildlife & Forests from the Lolo-Bitterroot Partnership. Ex. 1. We also agree with comments provided by the Flathead-Lolo-Bitterroot Citizen Task Force. Ex. 2. Further, we support the recommendations provided by American Rivers, including the following:

1. Retain in the preliminary inventory the 28 rivers and streams American Rivers is recommending for eligible wild and scenic protections in our report.
2. Adopt a permissive, transparent approach to the eligibility process when assigning ORVs and choosing regions of comparison.
3. Adopt a Climate Refuge ORV, under the “other” category, and evaluate it within a region of comparison that spans the Intermountain West.
4. Expand the region of comparison for the Fish ORV to include Montana.
5. Recognize wildlife migration corridors tied to rivers in its Wildlife ORV definition.
6. Deeply and meaningfully engage with area Tribes to determine the location, level of detail, language, and appropriate cultural meanings to convey under the Historic and Cultural ORV.

Finally, we want to emphasize the need to expand the agency's consideration of Outstanding Remarkable Values (ORV) when assessing the potential of an area for wilderness designation. Specifically, we urge the planning team to include select non-extractive ecosystem services, in particular regulating services such as carbon storage as an ORV. This will allow the agency to help address the climate crisis, particularly where stands have reached maturity from a carbon perspective. *See* Birdsey et al., 2023. Exhibit 3. While the Task Force comments include this direction, we want to emphasize that in the 21st century, the highest and best use of our national forest lands is to provide non-extractive ecosystem services, in particular:

- (1) Provisioning services, such as clean air and fresh water, **and NOT** energy, fuel, forage, fiber, and minerals;
- (2) Regulating services, such as long term storage of carbon; climate regulation; water filtration, purification, and storage; soil stabilization; flood control; and disease regulation;
- (3) Supporting services, such as pollination, seed dispersal, soil formation, and nutrient cycling; and
- (4) Cultural services, such as educational, aesthetic, spiritual and cultural heritage values, **and less** recreational experiences, and tourism opportunities.¹

We appreciate your consideration of these comments and look forward to meeting with the Planning Team to discuss specific proposals relating to these comments and beyond.

Cordially,

Adam Rissien, ReWilding Manager
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Exhibits

1. The Lolo-Bitterroot Partnership: A Citizen Plan For Fish, Wildlife & Forests, June 2022
2. Flathead-Lolo-Bitterroot Task Force Comments on the Wilderness and Wild & Scenic Rivers Inventories; Lolo National Forest Plan Revision. May 12, 2023.
3. Birdsey, R. A., DellaSala, D. A., Walker, W. S., Gorelik, S. R., Rose, G., & Ramírez, C. E. (2023). Assessing carbon stocks and accumulation potential of mature forests and larger trees in U.S. federal lands. *Frontiers in Forests and Global Change*, 5, 1074508
<https://doi.org/10.3389/ffgc.2022.1074508>

¹ 36 C.F.R. 219.19. (emphasis added).