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Comments on the Wilderness and Wild & Scenic Rivers Inventories; Lolo National Forest Plan Revision

Lolo National Forest
Attn: Amanda Milburn, Revision Team Leader
24 Fort Missoula Road
Missoula MT 59804 May 12, 2023

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

Dear Ms. Milburn,

We are pleased to submit these comments on the Wilderness and Wild & Scenic River Inventories. The Flathead-Lolo-Bitterroot Citizen Task Force is dedicated to forest plan revisions and regional grizzly bear recovery through habitat protection and connectivity.

Wilderness Inventory Comments—

Apply Connectivity as an Outstandingly Remarkable Value

Connectivity is a central element of the Lolo National Forest. The Lolo National Forest has portions of three Grizzly Bear Recovery Areas, the Ninemile Demographic Connectivity Area and other connectivity habitat for grizzly bears including the Northern Bitterroot Mountains, the Sawmill-Petty area and the Sapphire Mountains. Due to its central location, the Lolo National Forest is extremely important to regional grizzly bear recovery policy as well as natural immigration into the Bitterroot ecosystem.

The Ninemile Demographic Connectivity Area is the only area than can link the NCDE, Cabinet-Yaak and Bitterroot Grizzly Bear Recovery Zones, which would greatly decrease the risk of extinction to the species by providing demographic and genetic aid. This area on the Lolo National Forest was designated as a Demographic Connectivity Area in the Conservation Strategy for Grizzly Bears in the NCDE (USFWS 2018) to provide habitat for female grizzly bears and their cubs. It plays a significant role in regional recovery planning.

Roadless areas are central to demographic connectivity for grizzly bears and where much of the required suitable grizzly bear denning habitat for the demographic connectivity model is located (Bader and Sieracki 2022).

On page 47 the Grizzly Bear Conservation Strategy states:

> *Population Connectivity*
> *Connectivity among grizzly bear populations mitigates genetic erosion and increases resiliency to demographic and environmental variation. One way to mitigate potential impacts from climate change is through well-connected populations of grizzly bears in the lower-48 States and Canada. This Conservation Strategy envisions the NCDE serving as a "source population" for grizzly bear populations in the CYE, BE, and GYE. Attaining habitat connectivity between these areas would benefit multiple wildlife species and would be consistent with the USFWS Grizzly Bear Recovery Plan (USFWS 1993), the Grizzly Bear Management Plan for Western Montana (Dood et al. 2006), the Grizzly Bear Management Plan for Southwestern Montana (MFWP 2013), the interagency statement of support for the concept of linkage zones signed by the State wildlife agencies in Montana, Washington, Idaho, and Wyoming and the USFS, USFWS, USGS, NPS.*

The U.S. Fish & Wildlife Service will also prepare a new EIS on Bitterroot Recovery as per the ruling in *Alliance for the Wild Rockies v. Cooley*, CV-21-136-M-DWM, (D. Mont. Mar. 15, 2023) and estimates it will be completed over the next four years (Frazer declaration). At this time the strategy for this Recovery Zone is natural immigration through historically occupied habitats.

The White House Council on Environmental Quality issued a policy on habitat connectivity on March 21, 2023 titled *Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors* (attached). This policy applies to all federal agencies and directs federal agencies to work to identify and protect connectivity. From the Policy:

Increasing connectivity is one of the most frequently recommended climate adaptation strategies for biodiversity management. Connectivity allows wildlife to access needed resources and facilitates fundamental ecological processes. Furthermore, connectivity promotes climate adaptation and resilience by enabling wildlife to adapt, disperse, and adjust to changes in the quality and distribution of habitats, including climate-driven shifts in species' geographic ranges. Since connectivity is vital to ecosystem health and functions, it is significant to humans as well and supports the strong cultural and spiritual connections that communities have to nature. Maintaining connected habitats also can help sustain ecosystem services (i.e., benefits that flow from nature to people), such as flood risk reduction, extreme heat mitigation, health and public safety, access to nature, hunting and fishing, livelihoods, and subsistence.

Key Policy goals related to the Lolo National Forest Plan Revision:

- *Elevating the conservation, enhancement, protection, and restoration of connectivity and corridors as a programmatic goal*
- *Planning at the scale of landscapes, waterscapes, or seascapes rather than at the scale of an individual project*
- *Applying ecosystem-based conservation, enhancement, protection, and restoration strategies, including using nature-based solutions*

• Advancing plans and actions that improve the resilience of corridors to climate change or that conserve corridors needed to facilitate climate adaptation
• Rehabilitating habitat damaged by natural or human impacts to facilitate continued connectivity

Include all roadless areas, including those < 5000 acres

These are vital as secure habitat for grizzly bears and other wildlife and for connectivity. The Connectivity ORV means that roadless areas <5000 acres should also be included in the Wilderness inventory process, particularly when they are only separated from larger roadless areas by just one road and where they are close to other roadless areas < 5000 acres.

Roadless areas that are contiguous with roadless areas on adjacent National Forests and other federal and state lands should be considered as a whole.

Include areas with past disturbance that is now considered "substantially unnoticeable"

These areas are critical to connectivity and will become totally unnoticeable over the life of the forest plan process as long as they remain undisturbed.

Include Mature and Old Growth Forest and Climate Refugia as Outstandingly Remarkable Values

There is a very strong connection between roadless areas and remaining Mature and Old Growth (MOG) forests. The map results from DellaSala et al. (2022) show extensive MOG on the Lolo National Forest in GAP 1 and 2 lands (protected areas, National Parks and Wilderness) and GAP 2.5 lands (Inventoried Roadless Areas) (see Figures 1 and 2).

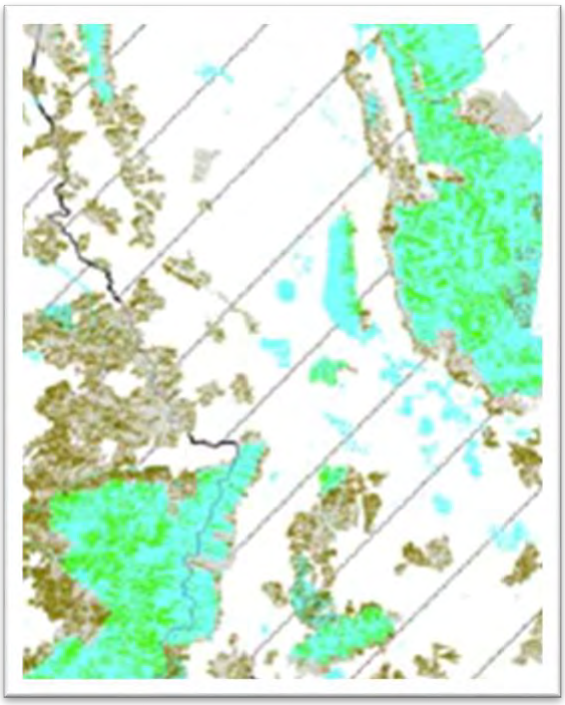

Figure 1. Roadless Areas and MOG in the Lolo National Forest Area. DellaSala et al. 2022

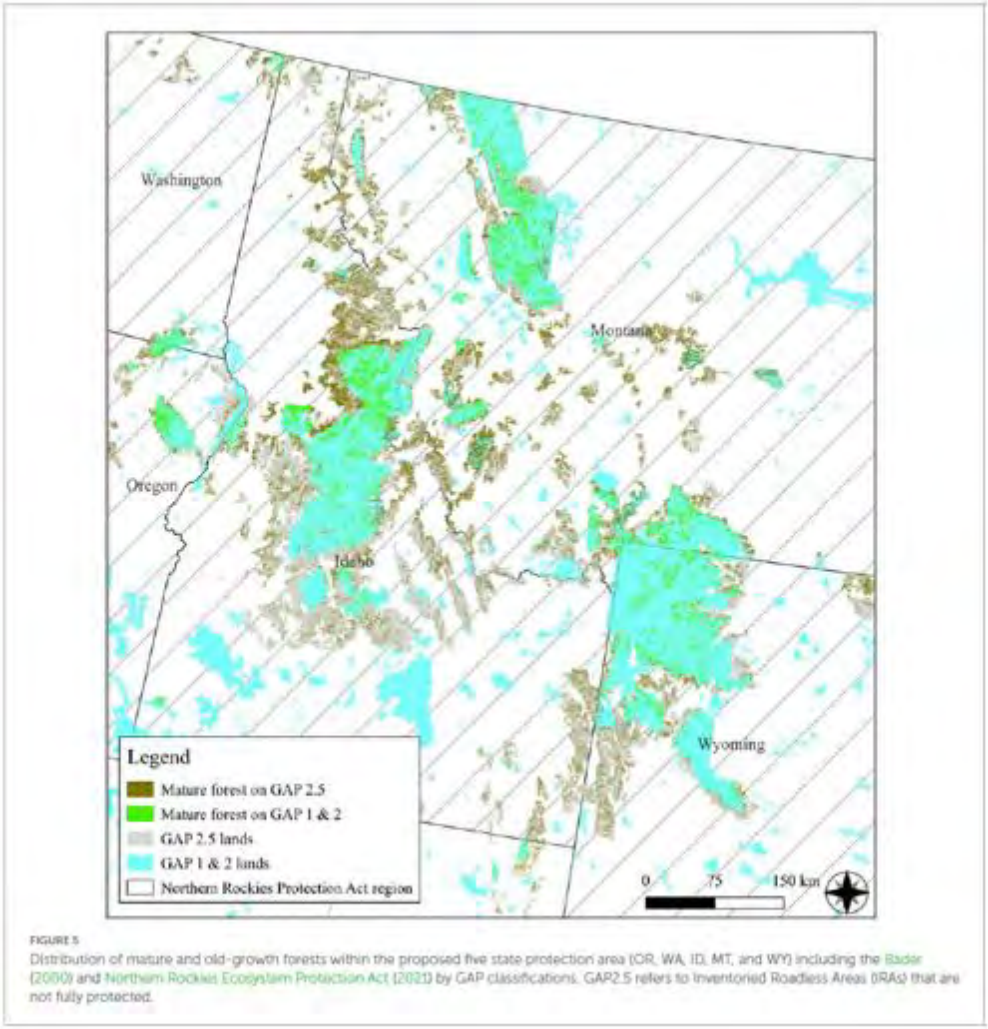

FIGURE 5
Distribution of mature and old-growth forests within the proposed five state protection area (OR, WA, ID, MT, and WY) including the Bader (2009) and Northern Rockies Ecosystem Protection Act (2021) by GAP classifications. GAP2.5 refers to Inventoried Roadless Areas (IRAs) that are not fully protected.

Figure 2. Roadless Areas and Mature and Old Growth Forests in the Northern Rocky Mountains. DellaSala et al. 2022.

Include Grizzly Bear Denning Habitat as an Outstandingly Remarkable Value

Grizzly bear denning habitat should be factored into the inventory process. It is vital to the demographic connectivity model. Most denning habitats are in roadless areas (Bader and Sieracki 2022).

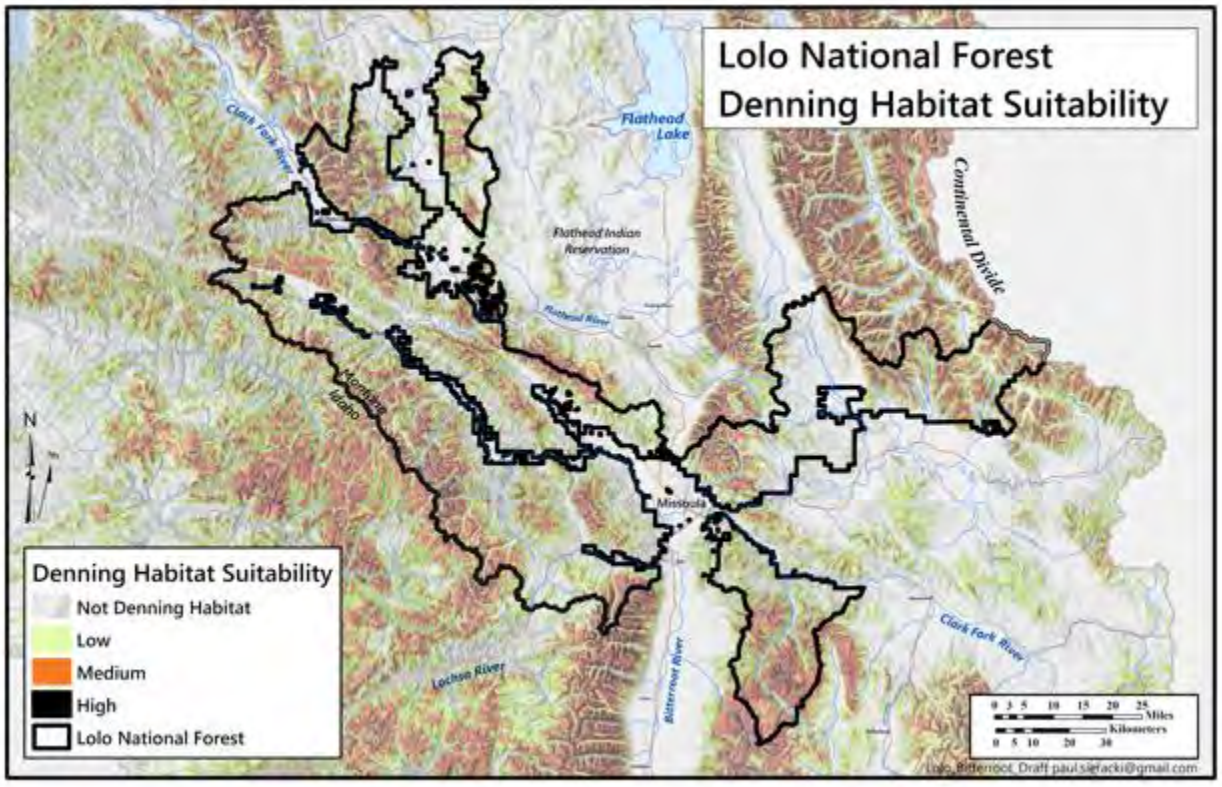

Figure 1. Suitable Grizzly Bear Denning Habitats on the Lolo National Forest. Bader and Sieracki 2022.

Include all areas recommended for Wilderness classification by the Citizen Alternative

More than 11,000 people have signed a petition in favor of the Citizen Alternative and there are dozens of organizations, businesses and scientists behind it.

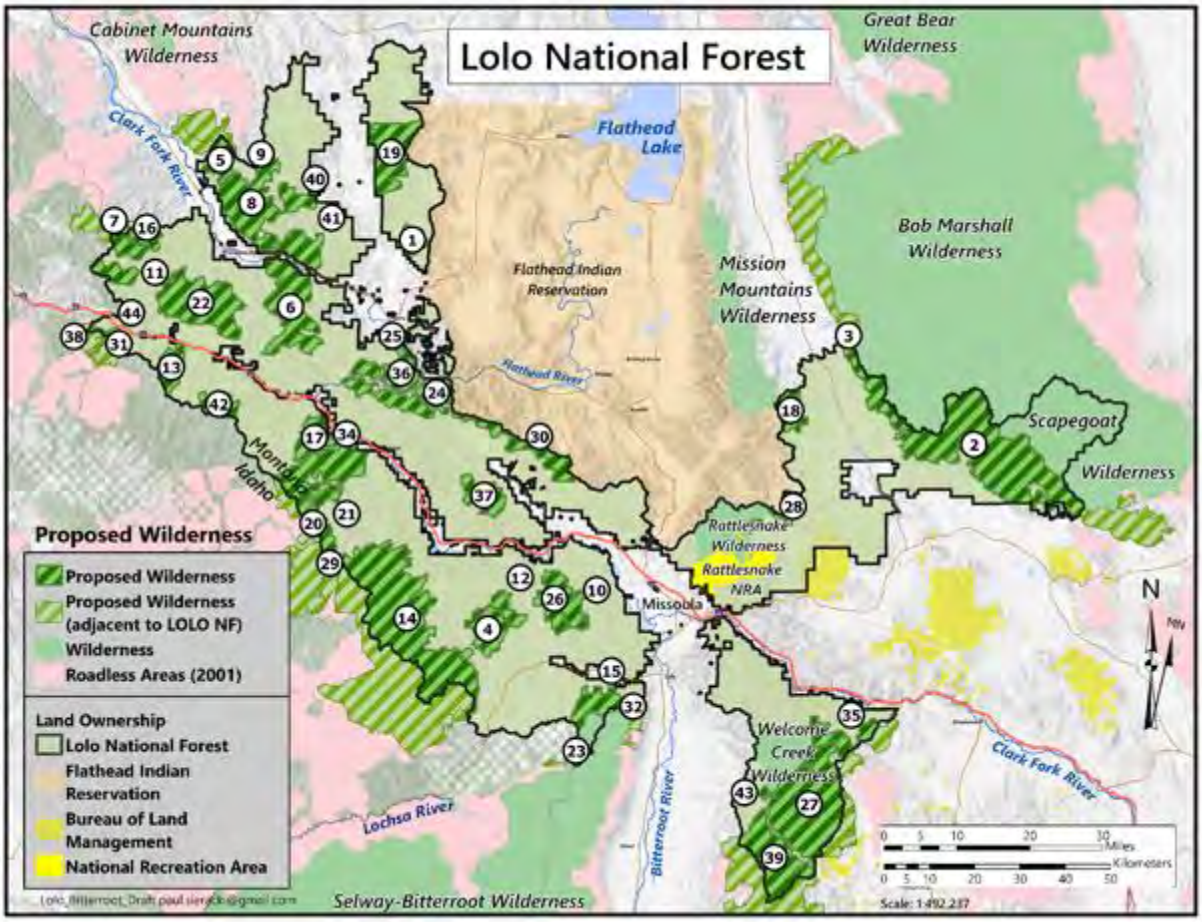

Figure 2. Areas Proposed for Wilderness in the Lolo-Bitterroot Partnership Citizen Plan.

Wild & Scenic River Inventory Comments—

The FLBCTF supports the Forest Service's decision to forego suitability as part of the Lolo National Forest plan revision process. In general, we oppose suitability within planning because it is costly, controversial, and subjective and political, which diminish the agency's credibility as an unbiased, science-based authority. We have observed that suitability processes conducted during planning often lead to decreases in river protection that result in litigation. We appreciate the agency's early and clear decision to forego suitability at this time on the Lolo National Forest.

Apply the Climate Shield data and Climate Refugia as an Outstandingly Remarkable Value

Adopt a Climate Refuge ORV, under the "other" category, and evaluate it within a region of comparison that spans the Intermountain West.

Include all rivers recommended for Wild & Scenic in the Citizen alternative

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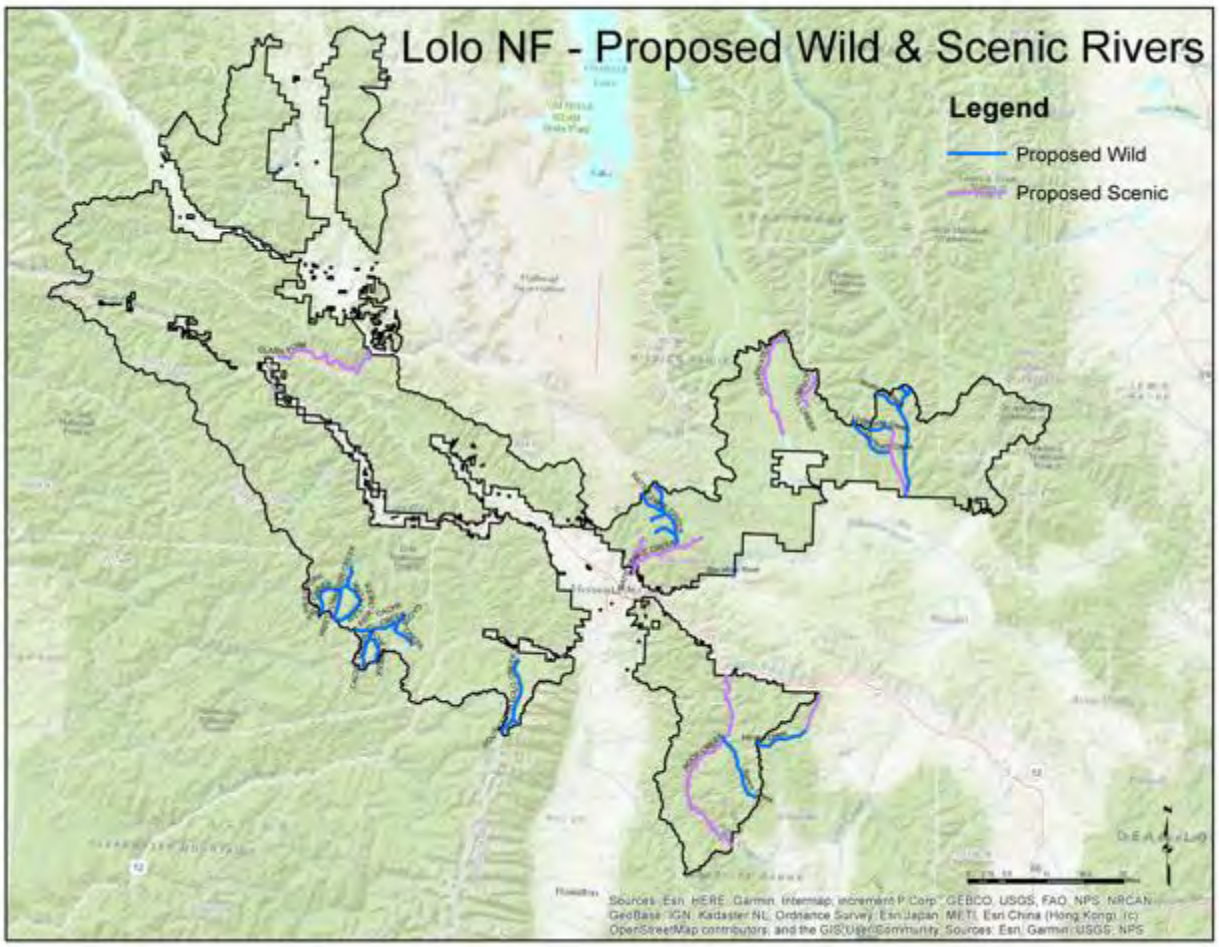

Figure 3. Streams Proposed as Wild & Scenic in the Lolo-Bitterroot Partnership Citizen Plan.

Apply bull trout and cutthroat trout presence and designated Bull Trout Critical Habitat as an Outstandingly Remarkable Values

Bull trout and westslope cutthroat trout are Outstandingly Remarkable Values. Riparian Habitat Conservation Areas as defined under the Lolo National Forest Plan as Amended by the Inland Native Fish Strategy (INFISH) are also an Outstandingly Remarkable Value which are not only critical to survival of native fish, they also provide Climate Refugia.

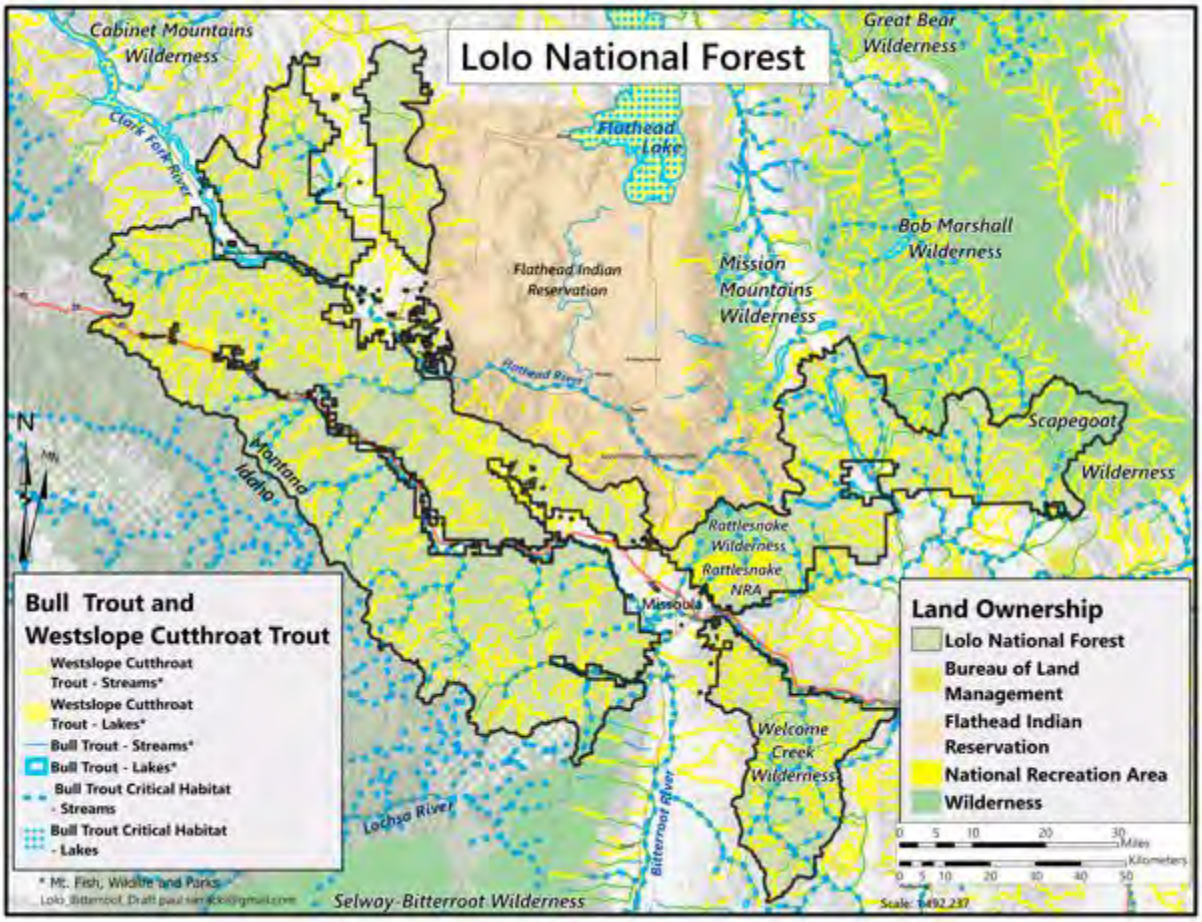

Figure 4. Bull Trout Critical Habitat and Westslope Cutthroat Trout Streams on the Lolo National Forest.

Include all 28 rivers found to be suitable for Wild & Scenic classification in the American Rivers Analysis

Sincerely,

/s/ Patty Ames, President
Flathead-Lolo-Bitterroot Citizen Task Force

Sources Cited

Bader M. and P. Sieracki. 2022. Grizzly bear denning habitat and demographic connectivity in northern Idaho and western Montana. Northwestern Naturalist 103(3):209-225.

DellaSala D.A., B. Mackey, P. Norman, C. Campbell, P.J. Comer, C.F. Kormos, H. Keith and B. Rogers. 2022. Nature and old growth forests contribute to large-scale conservation targets in the conterminous United States. Frontiers in Forests and Global Change. DOI 10.3389/ffgc.2022.979528:1-20.

Executive Office of the President, Council on Environmental Quality. 2023. Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors. March 21, 2023. 11p.