



May 16, 2023

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

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

Dear Ms. Milburn,

American Rivers appreciates the opportunity to submit the following comments on the Draft Wild and Scenic Rivers Inventory and Outstandingly Remarkable Value Evaluation Framework for the Lolo National Forest.

Founded in 1973, American Rivers is the leading conservation organization working to protect and restore the nation's rivers and streams. American Rivers works alongside communities as we champion a movement to protect and restore the rivers on which we all depend. Currently, we have more than 7,000 members and supporters in Montana, many of whom live along, work on, and/or recreate on rivers and streams flowing through the Lolo National Forest.

American Rivers values the opportunity to comment at this early stage within the Wild and Scenic River Eligibility Study. We also recognize and appreciate the public outreach efforts the Lolo National Forest has made with its webinars and ranger chats.

As the first step in the Wild and Scenic Rivers Eligibility Study, we commend the Lolo National Forest for conducting a thorough investigation of free-flowing rivers and streams to create its preliminary inventory and maps. American Rivers' [September 2022 Lolo and Bitterroot Wild and Scenic River Eligibility Report](#) identifies 28 free-flowing streams with Outstandingly Remarkable Values (ORVs) on the Lolo National Forest, and we note the alignment between those listed in our report and those included in the preliminary inventory.

American Rivers supports the Forest Service's decision to forego Wild and Scenic River suitability as part of the Lolo National Forest plan revision process. In general, we oppose Wild and Scenic River 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 Wild and Scenic River 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 Wild and Scenic River suitability at this time on the Lolo National Forest.

Although the following pages outline in detail our comments on the Wild and Scenic River Preliminary Inventory and the Outstandingly Remarkable Value Evaluation Framework, here is a summary of our requests:

*American Rivers requests that the Lolo National Forest:*

- 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. *Expand its recreation ORV definition to recognize local use and focus on recreation quality, rather than recreation quantity.*
7. *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.*

Since the Planning Team will use the Outstandingly Remarkable Value Evaluation Framework to identify eligible streams from the free-flowing inventory, we appreciate the opportunity to comment at this stage to assist the agency in developing a robust, transparent process. We have also submitted our Eligibility Report along with these comments to illustrate how these requests can be applied on the landscape in a way that recognizes multiple ORVs and prioritizes climate refuge.

Warm regards,



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# Draft Wild and Scenic River Inventory

## 1. Alignment with American Rivers Eligibility Report

*American Rivers requests that the Lolo National Forest retain in the preliminary inventory the 28 rivers and streams we recommend for eligible wild and scenic protections in our report.*

In its preliminary inventory, the Forest Service has defined free-flowing as “applied to any river or section of a river means that the stream is existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway.” In September 2022, American Rivers released its [Wild and Scenic Rivers Eligibility Report for the Lolo and Bitterroot National Forests](#). In the report, we identify the following 28 rivers and streams (Table 1) as being free-flowing and also having at least one Outstandingly Remarkable Value (ORV).

<b>RANGER DISTRICT</b>	<b>NAME</b>	<b>Recommended ORVS</b>
Missoula	Alder Creek	Climate Refuge, Fish
	South Fork Lolo Creek	Climate Refuge, Fish, Recreation
	Ranch Creek	Climate Refuge, Fish
	Rattlesnake Creek	Culture, Climate Refuge, Fish, History, Recreation, Scenery
	Rock Creek	Culture, Fish, History, Recreation
	Welcome Creek	Climate Refuge, Fish, Recreation
Ninemile	Cache Creek	Climate Refuge, Fish, Recreation
	Fish Creek	Botany, Fish, Geology, Recreation
	North Fork Fish Creek	Climate Refuge, Fish, Geology, Recreation
	South Fork Fish Creek	Fish, Geology, Recreation
	West Fork Fish Creek	Climate Refuge, Fish, Geology, Recreation
	Straight Creek	Climate Refuge, Fish, Recreation, Scenery
Plains/Thompson Falls	Graves Creek	Climate Refuge, Fish, Recreation
	Prospect Creek	Climate Refuge, Fish, Geology, Recreation, Scenery
	Thompson River	Fish, Geology, Recreation, Scenery
	West Fork Thompson River	Climate Refuge, Fish, Recreation, Scenery
	Wilkes Creek	Climate Refuge, Fish, Recreation, Scenery
Seeley Lake	North Fork Blackfoot River	Climate Refuge, Fish, Recreation, Scenery
	Clearwater River	Culture, Fish, Recreation, Wildlife
	Dunham Creek	Climate Refuge, Fish, Recreation, Scenery
	Lodgepole Creek	Climate Refuge, Fish, Geology, Scenery
	Monture Creek	Climate Refuge, Fish, Recreation, Scenery
	Morrell Creek	Climate Refuge, Fish, Geology, Recreation, Scenery
Superior	Cedar Creek	Climate Refuge, Fish, Recreation
	Clark Fork River	Culture, Fish, Recreation
	Lost Creek	Climate Refuge, Fish, Geology, Recreation, Scenery

	St. Regis River	Fish, Recreation
	Trout Creek	Climate Refuge, Fish, Recreation

We commend the Forest Service for also finding all of these rivers to be free-flowing in its Wild and Scenic Rivers Preliminary Inventory.

# Draft Outstandingly Remarkable Value Evaluation Framework

## 1. Process

Following the preliminary inventory of rivers and streams, the Forest Service will use a framework for defining, identifying, and evaluating ORVs within regions of comparison to select rivers that exhibit both free-flow and at least one ORV. This new list will represent those rivers that the agency determines to be eligible for Wild and Scenic River protections under the Lolo National Forest Plan.

### 1.A. General Process Expectations

***American Rivers requests that the Lolo National Forest adopt a permissive, transparent approach to the eligibility process when assigning ORVs and choosing regions of comparison.***

The intent of the [Wild and Scenic Rivers Act of 1968](#) (Public Law 90-542; 16 U.S.C. 1271 et seq.), amplified by mandates from the Biden administration to protect 30% of lands and waters by 2030, should be interpreted as a permissive approach to river protection, both in the evaluation of ORVs and in determination of regions of comparison. Eligible rivers must be free-flowing and possess one or more ORVs to qualify as eligible under the Act's direction and Forest Service policy. Regions of comparison should *not* be chosen or used purposefully to unreasonably limit ORV application. We request that the agency avoid an unduly, exclusive, limited approach to the eligibility process, overall, so as to ensure alignment with the intent of the Act and the current administration's climate mandates. Further, since the agency has decided to forego the suitability process, it should ensure that the eligibility process does not aspire to such lofty and exclusive standards that it becomes a de facto suitability process. Whether eligible rivers are ultimately designated as Wild and Scenic Rivers—a decision made exclusively by Congress—is neither the concern nor the purview of the agency. The Forest Service should look to other Region 1 planning processes as examples of expansive river protections. Since 2015, the Kootenai, Flathead, Helena-Lewis and Clark, and Custer Gallatin National Forests have collectively increased eligible Wild and Scenic River miles by 200%. Within the context of a permissive approach to river protection, the Lolo National Forest's eligibility process should be objective, transparent, well-documented, and undergirded by the best available science. We request that the agency explicitly show its work to justify regions of comparison and evaluate ORVs to ensure that community partners, like American Rivers, can assist by providing meaningful comments.

## 2. Outstandingly Remarkable Values

### 2.A. Climate Refuge

***American Rivers requests that the Lolo National Forest adopt a Climate Refuge ORV, under the "other" category, and evaluate it within a region of comparison that spans the Intermountain West.***

#### 2.A.a. Authority

Congress granted the Forest Service statutory authority under the Wild and Scenic Rivers Act, section 1(b) to identify free-flowing rivers with "scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values." While the Act includes distinct categories, it also expressly provides the ability to define ORVs outside of these categories. The [Forest Service Handbook 1909 82.73a](#) further authorizes the agency to define ORVs within an "Other" category:

7. Other Similar River-related Values. While no specific national evaluation guidelines have been developed for this category, determinations consistent with the preceding guidance and section 82.73 of this Handbook may be developed for other values that may be outstandingly remarkable, including but not limited to botanic, hydrologic, palaeontologic, scientific, and heritage values.

The current administration has prioritized climate change and has provided direction regarding operationalization of climate change policies. President Biden issued Executive Order 1408 Sec. 216 [Tackling the Climate Crisis at Home and Abroad. Conserving Our Nation's Lands and Waters](#), which created the America the Beautiful initiative to conserve at least 30 percent of lands and waters by 2030. The Department of Agriculture's subsequent [Action Plan for Climate Adaptation and Resilience](#) identified threats to water quantity and quality within the top five climate impacts we face as a nation.

In June 2022, the Secretary of Agriculture issued Secretarial Memorandum 1077-004 [Climate Resilience and Carbon Stewardship of America's National Forests and Grasslands](#). In Section 2.b(4) Integration with Planning, the memorandum specifically directs the department and the Forest Service to:

Develop recommendations for methods to incorporate new analyses and data and the use of new and innovative tools and technology to ensure climate resilience, and carbon stewardship considerations are integrated into forest and relevant project planning. For land management planning, this should include recommendations for how to support the explicit consideration of carbon stewardship optimization and climate adaptation in defining desired conditions, and how to evaluate whether certain National Forest System lands are appropriate for designation as “not suitable for timber production” pursuant to 16 United States Code (U.S.C.) 1604(k), Development of land management plans, based on those considerations.

The Forest Service’s [Climate Adaptation Plan](#), issued in July 2022, further directs the agency to “fully integrate climate vulnerability assessments and adaptation strategies into land management planning and other planning across landscapes” (section 3b), “identify and protect climate refugia, such as cold-water streams and cool microclimates, as well as movement corridors for species migration” (section 3c), and “incentivize and reward work on climate change research and adaptation, environmental justice, and sustainability” (section 6b).

Together this body of statutory, regulatory, and administrative guidance allows the Forest Service to use new and innovative tools for climate resilience within the planning process and promotes a culture that encourages employees to do so. Within the specific context of the Lolo National Forest Plan Revision and Wild and Scenic Rivers eligibility study, this guidance allows the Lolo National Forest and its Planning Team to add a Climate Refuge ORV to its existing ORV list.

#### *2.A.b. Need*

The current ORV list includes scenery, recreation, geology, fish, wildlife, historic and cultural values, and botanical (other). This list does not directly address or include climate change, nor does the framework proposed mention the word “climate.” We disagree with the Forest Service’s statement that “the criteria were specific enough to ensure the team, the public, and external groups could understand how river-values would be considered and compared, yet general enough to capture all possible unique, rare, or exemplary river-values found across the Lolo National Forest.” We argue that specificity/generality alone are not a sufficient measure of the lack of need for other ORVs, including a Climate Refuge ORV. The existing ORVs listed cannot alone sufficiently embody climate change because, in areas of climate refuge, a river may not be exemplary according to any one ORV, but when taken together in a package of climate refuge, that river may demonstrate unique and rare character. For example, a river with ample cold-water springs and seeps that provides habitat for native fish may not be exemplary for either its cold-water properties (since cold water is not embodied within any of the standard ORV categories) or native fish habitat quality separately. However, when these properties are viewed together through the lens of climate refugia, this river may emerge as remaining cold under climate change scenarios, providing critical future habitat for increasing numbers of native and cold-water dependent species, and thus warranting protection.

Another example relevant in the west and western Montana is the nexus of cold-water persistence and either genetic purity persistence or threatened/endangered species persistence. To embody the full intent granted by the Wild and Scenic Rivers Act and administrative 30x30 mandates, we request that climate change be prioritized and operationalized through definition of a Climate Refuge ORV under the “other” category that includes the nexus of the following qualities:

- Clean, cold, copious water
  - Rivers fed by snowsheds (glaciers, snowfields, favorable north aspect)
  - Rivers fed by springs and seeps (groundwater and infiltration)
- Persistent habitat
  - Native fish
  - Threatened or endangered species (e.g., bull trout)
  - Aquatic species
  - Riparian dependent species
  - Migration corridors

Datasets and articles discussed below in section 2.A.d. provide relevant climate refuge science.

### 2.A.c. Region of Comparison

The Forest Service Handbook 1909 82.73 provides latitude in defining “different regions of comparison for different rivers or categories of outstandingly remarkable values” and advises that “a region of comparison should be scaled at an appropriate level for the type of river value being evaluated.” It is common practice for national forests to use different regions of comparison to assess different ORVs. Beyond the general process recommendations offered above regarding region of comparison, the current singular region of comparison, western Montana, is inappropriately scaled for evaluations related to climate change. Using such a small region of comparison, when compared to the broad scope at which climate change is affecting landscapes, puts the agency at risk of myopic assessment that would ignore valuable and increasingly diminishing riparian refuges. As an example, some of the best remaining populated trout streams should not be compared nor compete with one another for ORV recognition when they represent a fraction of remaining occupied habitat within their original range. Instead, we request that the agency adopt the Intermountain West as an appropriate region of comparison for a Climate Refuge ORV. This larger region of comparison better matches the scale of climate change. The Intermountain West is located between the front ranges of the Rocky Mountains on the east and the Cascade Range and Sierra Nevada on the west (see Figure 1).

Figure 1: Intermountain West map



### 2.A.d. Science

The Forest Service is required to use the best available science to ground its decisions. [Adaptation Partners](#) climate vulnerability studies span the western United States. Their [research in the Northern Rockies](#) predicts that decreasing snowpack and declining summer flows will alter the temperature, timing, and availability of water, affecting instream fishery flows and the abundance, distribution, and vigor of cold-water fish species (Halofsky et al. 2018). Their suggested adaptation strategies for land managers include maintaining and restoring channel and floodplain function to retain cold water, protecting groundwater and springs, and reconnecting or maintaining connectivity to refugia habitat—activities that recognize the important overlap between cold water persistence and fish species persistence.

The Rocky Mountain Research Station’s [Climate Shield Cold-Water Refuge Streams for Native Trout](#) specifically highlights important refugia in the Pacific Northwest (Washington, Oregon, Idaho, and western Montana) for bull trout and cutthroat trout, species already constrained to high elevations and latitudes. They predict that, under moderate to extreme climate change scenarios, refugia with the highest likelihood of trout persistence will exist on public lands outside National Parks and wilderness areas (Issak et al. 2015). They suggest that these areas represent the best options for climate smart watershed protections for bull trout and cutthroat trout, even more heavily underscoring the need for climate refugia to be recognized and protected. The [Forest Service’s Stream Temperature and Native Trout storymap](#), which uses sliders to display the climate shield data, illustrates the importance of the Lolo National Forest in protecting key cold water bull trout and cutthroat trout habitat into the future.

The studies cited here and others from Adaptation Partners and the Climate Shield project represent Forest Service-backed science. Authorized by the statutory and administrative authority described above, this body of science supports the need to adopt a Climate Refuge ORV within the Lolo National Forest planning process.

### 2.B. Fish

***American Rivers requests that the Lolo National Forest expand the region of comparison for the Fish ORV to include Montana.***

The Lolo National Forest is home to four species of trout, mountain whitefish, suckers, northern pikeminnow, sculpins, and other species. Bull trout, westslope cutthroat trout, mountain whitefish, longnose and largescale suckers, and northern pikeminnow are native to western Montana. Bull trout are a threatened species; westslope cutthroat trout are a sensitive species. The Lolo National Forest’s fish ORV definition includes river habitat for nationally or recognized

species, threatened/endangered/sensitive species, native wild stocks, and species in decline within the region of comparison.

Threatened species like bull trout and sensitive species like westslope cutthroat trout have declined in many locations due to climate change, non-native species competition, hybridization, and habitat degradation, but western Montana continues to be a stronghold for these native species. We note alignment between our [Wild and Scenic River Eligibility Report for the Lolo and Bitterroot National Forests](#) and the Forest Service's [Conservation Strategy for Bull Trout on USFS Lands in Western Montana](#), which identifies the following rivers and streams with moderate to highly significant local bull trout populations:

- Rock Creek Core Area
  - Alder Creek
  - Ranch Creek
  - Welcome Creek
- Blackfoot River Core Area
  - North Fork Blackfoot River
  - Monture Creek
  - Dunham Creek
- Clearwater River Core Area
  - Morrell Creek
- Middle Clark Fork Core Area
  - Rattlesnake Creek
  - Fish Creek (main stem and West, South, and North forks)
  - Cache Creek
  - Trout Creek
  - Cedar Creek
  - St. Regis River
- Lake Pend Oreille/Lower Clark Fork
  - Thompson River (including West fork)
  - Prospect Creek
  - Graves Creek
  - Wilkes Creek

Further, the 2007 [Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana](#) and other research on westslope cutthroat trout populations (Shepard et al. 2003, Shepard et al. 2005) underscore the importance of habitat and population protections on the Lolo National Forest.

However, the current region of comparison does not reflect enough of the known and historic range of bull trout or westslope cutthroat trout (described in the referenced publications) to reveal unique or exemplary habitat. Similar to arguments presented above under the Climate Refuge ORV, the best remaining populated bull trout streams should not be compared nor compete with one another for ORV recognition, since when viewed at a larger scale, they represent a fraction of remaining occupied habitat within their original range. Instead, we request that the agency adopt a larger region—the state of Montana—as an appropriate region of comparison for the Fish ORV.

## 2.C. Wildlife

***American Rivers requests that the Lolo National Forest recognize wildlife migration corridors tied to rivers in its Wildlife ORV definition.***

In a memo dated August 19, 2022 and titled Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions, the Forest Service asks regions to “Consider the impacts of Agency actions on ecological connectivity and wildlife corridors during broad-scale planning associated with the land management planning process.” Yet, the Lolo National Forest’s current definition for the Wildlife ORV does not include or acknowledge migration corridors. The [Theodore Roosevelt Conservation Partnership \(TRCP\) 2022 study](#) shows that certain river corridors fall within and serve as conduits for big game migration between summer and winter ranges for elk, deer,



and bighorn sheep. We note the overlap between migration corridors identified in this report and rivers in our [Lolo and Bitterroot Wild and Scenic River Eligibility Report](#):

- Dunham, Lodgepole, and Monture Creeks are within the migration path for elk moving between the Mission Mountains and the Blackfoot Clearwater Game Range
- Rattlesnake Creek is a migration corridor for elk and mule deer moving between the Rattlesnake Wilderness and Gold Creek drainage to winter range on Mount Jumbo
- Fish Creek and Trout Creek and their tributaries facilitate important movement by elk between Idaho and the Bitterroot Mountains and low-elevation winter range on both sides of Interstate 90
- Rock Creek and its tributaries provides habitat for the lower Rock Creek bighorn sheep herd that migrates between the creek bottom in winter and its upper slopes and open grasslands in summer

We request that the agency include wildlife migration corridors tied to rivers in its Wildlife ORV definition to ensure this quality can be properly included in Wildlife ORV evaluation.

## 2.D. Recreation

***American Rivers requests that the Lolo National Forest expand its recreation ORV definition to recognize local use and focus on recreation quality, rather than recreation quantity.***

In addition to attracting use from regional and out-of-state visitors, the Lolo National Forest is known and loved as a “locals” forest by Missoula residents and outlying rural communities. According to the [2016 National Visitor Use Monitoring Program](#), 70.5% of visitors surveyed originated from Missoula County. Rather than determining recreational ORV status using visitation numbers from non-area residents, this definition should prioritize, and appropriately weight, local use. Further, the definition should focus more on recreation quality in terms of experience values rather than recreation quantity. As an example, a remote river that provides challenging, seasonal paddling attributes that are primarily enjoyed by skilled local paddlers should not be dismissed as not having enough recreation to warrant a recreation ORV.

## 2.E. Historic and Cultural

***American Rivers requests that the Lolo National Forest 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.***

### 2.E.a. Authority

The [Forest Service Equity Action Plan](#) recognizes the administrative direction on Indigenous collaboration within the 2021 [Tribal Consultation and Strengthening Nation-to-Nation Relationships memorandum](#) and Joint Secretarial Order 3403, [Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters](#). Section 2 of the plan gives culturally relevant strategies for enhancing Tribal engagement, and metrics associated with planning specifically list increases in the percentage of Forest Plans and other planning that incorporate Indigenous traditional ecological knowledge.

### 2.E.b. Need

In the 1991 Eligibility Study, the Lolo National Forest noted the following historical and cultural values:

1. Cache Creek (rock quarry and lithic procurement sites)
2. Clearwater River (prehistoric sites, colonial logging activities)
3. Clark Fork River (prehistoric campsites, colonial homestead and logging activities)
4. Morrell Creek (none)
5. North Fork Blackfoot (prehistoric sites, North Fork and Carmichael Cabins)
6. Rattlesnake Creek (prehistoric sites, colonial sites, limestone kiln)
7. Rock Creek (prehistoric sites, colonial ranches, homesteads, and mining activities)
8. South Fork Lolo Creek (colonial cabin)
9. West Fork Fish Creek (none)

Only the cultural values along Rock Creek, which are specific to colonial ranches, homesteads, and mining activities,

were deemed special enough to warrant protection under the 1991 Cultural ORV. Throughout the analysis of cultural values, descriptions of non-colonial cultural values were brief, non-specific, and vague compared to those provided for colonial cultural sites. This is not overly surprising since the processes and expectations for Tribal consultation have changed significantly since the 1990s.

Given the authority and direction provided above, the Lolo National Forest must seek a more thorough understanding of river-related Indigenous cultural sites through collaboration with the Confederated Salish and Kootenai Tribes (CSKT) through the cooperating agency MOU, Blackfeet Nation, and other Tribes included in the interagency working group that claim western Montana as part of their aboriginal territories. This collaboration should take the form of purposeful conversations with Tribal cultural bodies, rather than brief email notices for feedback or information. In [American Rivers Lolo & Bitterroot Wild and Scenic Rivers Eligibility Report](#), we sought guidance from CSKT and the Blackfeet Nation to identify outstanding Indigenous-specific cultural values for the Clark Fork River, Clearwater River, Rattlesnake Creek, and Rock Creek that are worthy of protection under a Cultural ORV. These descriptions identify current and past river uses and meanings and link them to specific Tribes or Indigenous groups, using Indigenous words where available and appropriate:

**Clark Fork River:** As an important fishery, gathering place, and the setting of numerous cultural stories and ways of knowing, the Clark Fork River plays a significant role in the current and historic culture of the Séliš (Salish), Qlispé (Kalispel and Pend d’Oreille), Kootenai, Ktunaxa, Nimípuu (Nez Perce), and Schitsu’umsh (Coeur d’Alene) Tribes, among others.

**Clearwater River:** The Clearwater River is culturally significant to the Blackfeet, Séliš (Salish), and Kootenai Tribes, serving as a historically important fishery and place of gathering. Many Tribes refer to the Clearwater watershed and surrounding area as the “backbone of the world”.

**Rattlesnake Creek:** Rattlesnake Creek is of great cultural significance to the Séliš (Salish), Qlispé (Kalispel and Pend d’Oreille), and other Indigenous Peoples, serving as a historical fishery and place of importance in many stories.

**Rock Creek:** Known as Npnétkw, meaning “Logs in the Water,” Rock Creek is a place of great importance to the Séliš (Salish) and Qlispé (Kalispel and Pend d’Oreille) Peoples. The area has been cherished for centuries for its bountiful fisheries, hunting grounds, and sources of other traditional foods and cultural practices.

While we acknowledge that sensitivities exist around providing too much detail about cultural site locations, through authentic, meaningful collaboration with area Tribes, American Rivers believes balance can be achieved in a way that more evenly recognizes both colonial and non-colonial place meanings, yet does not continue to eclipse Indigenous values.

## Scientific Citations

Halofsky, J.E.; Peterson, D.L.; Dante-Wood, S.K.; Hoang, L.; Ho, J.J.; Joyce, L.A., eds. 2018. [Climate change vulnerability and adaptation in the Northern Rocky Mountains](#). Gen. Tech. Rep. RMRS-GTR-374. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. Part 1.

Isaak, Daniel J.; Young, Michael K.; Nagel, David E.; Horan, Dona L.; Groce, Matthew C. 2015. [The cold-water climate shield: Delineating refugia for preserving salmonid fishes through the 21st century](#). Global Change Biology. 21: 2540-2553.

Shepard, B. B., B. E. May, and W. Urie. 2003. [Status of westslope cutthroat trout \(\*Oncorhynchus clarki lewisi\*\) in the United States: 2002](#). Montana Fish, Wildlife and Parks for the Westslope Cutthroat Trout Interagency Conservation Team, Helena, Montana.

Shepard, B. B., B. E. May, and W. Urie. 2005. [Status and conservation of westslope cutthroat trout within the Western United States](#). North American Journal of Fisheries Management 25:1426-1440.