



**Western
Watersheds
Project**

WWP Montana
PO Box 8837
Missoula, MT 59807
(208) 576-4314
patrick@westernwatersheds.org

Working to protect and restore Western Watersheds and Wildlife

May 16, 2023

Lolo National Forest Supervisor's Office
c/o Amanda Milburn, Plan Revision
24 Fort Missoula Rd.
Missoula, MT 59804

Via Electronic Submission to: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=62960>

Re: Scoping Comments for Lolo NF Forest Plan Revision-Wilderness and Wild & Scenic Rivers

Dear Ms. Milburn,

Thank you for accepting these comments for the Lolo National Forest Plan Revision (Wilderness and Wild & Scenic Rivers). Western Watersheds Project (WWP) is a non-profit organization with more than 14,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives and legal advocacy. Western Watersheds Project and its staff and members use and enjoy the public lands across the Lolo National Forest.

WWP provides some brief comments and suggestions below on the Wild & Scenic Rivers inventory, Outstandingly Remarkable Values Framework, as well as the draft Wilderness inventory.

Wilderness Inventory:

- WWP urges the Lolo NF to apply connectivity as an Outstandingly Remarkable Value for its wilderness assessment and evaluation. With climate change impacts and ever expanding development throughout Western Montana, planning ahead now to establish and protect connectivity for purposes of wildlife habitat will ensure maximum flexibility and safeguards for species as they adapt to changing conditions.
- We ask that all roadless areas, including those under 5000 acres, be included. These ecologically intact areas are vital as secure habitat for grizzly bears and other wildlife and provide much needed connectivity to ensure genetic health and flexibility of movement with changing forest conditions (like wildfire, habitat fragmentation, and increased motorized and other recreational use). The Wilderness Act and subsequent

legislation allow for wilderness designation of lands under 5,000 acres and we ask that the Lolo NF keep this in mind and avoid arbitrarily excluding parcels based solely on acreage.

- We ask not only that the Lolo NF include areas with past disturbance that are now considered "substantially unnoticeable", but also areas where the Service has found potentially substantially noticeable impacts that are only predicted to last for the life of the Forest Plan (~15-20yrs). These areas will passively restore in a relatively short period of time and their eligibility ought not to be denied for what are only temporarily noticeable impacts. 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 (which requires protection). Planning ahead now to establish connectivity through a wilderness inventory is a choice that will benefit those species that will struggle in a changing climate (ex. Grizzlies, bull trout, cutthroat trout, wolverines, lynx, etc.).

- WWP asks that the Lolo NF include Mature and Old Growth Forest as an Outstandingly Remarkable Value. Not only do mature and old growth trees protect our air and water, they also offer one of the cheapest, most efficient ways to mitigate and combat climate change. Their carbon storage capacity has been well-documented in the literature and preserving and protecting these crucial yet rapidly dwindling forests is a win-win for the climate and for wildlife (Dellsala, 2022).

- Finally, we ask that the Lolo NF include all areas recommended for Wilderness classification by the Citizen Alternative provided by the Flathead-Lolo-Bitterroot Citizen Task Force and Friends of the Bitterroot.

Wild & Scenic River Inventory:

- WWP asks that the Lolo NF apply the Climate Shield data as an Outstandingly Remarkable Value.

- We ask that the Lolo NF include all rivers recommended for Wild & Scenic designation in the Citizen Alternative provided by the Flathead-Lolo-Bitterroot Citizen Task Force and Friends of the Bitterroot.

- In order to protect cold water dependent species from climate change impacts, we ask that the Forest apply bull trout and cutthroat trout presence and designated Bull Trout Critical Habitat as Outstandingly Remarkable Resource Values. Protecting cold water refugia will be key to ensuring the survival of these species as their range continues to shrink from riparian degradation and the warming waters that result from climate change and reduced snow pack (Rieman et al., 2007).

- Finally, we ask that the Lolo NF include all rivers found to be suitable for Wild & Scenic classification in the 1991 Lolo National Forest Plan Amendment 12 assessment.

Thank you for the opportunity to comment. We ask that the undersigned representative of WWP be included in all future mailings and any other correspondence or project activity associated with the Lolo National Forest Plan Revision process.

Sincerely,

A handwritten signature in cursive script that reads "Patrick Kelly". The signature is written in black ink and is positioned above the typed name and contact information.

Patrick Kelly – Montana Director
Western Watersheds Project
PO Box 8837
Missoula, MT 59807
patrick@westernwatersheds.org
(208) 576-4314

References:

DellaSala, D. A., Mackey, B., Norman, P., Campbell, C., Comer, P. J., Kormos, C. F., ... & Rogers, B. (2022). Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States. *Frontiers in Forests and Global Change*, 209.

Rieman BE, Isaak D, Adams S, Horan D, Nagel D, Luce C, Myers D. (2007). Anticipated Climate Warming Effects on Bull Trout Habitats and Populations Across the Interior Columbia River Basin, *Transactions of the American Fisheries Society*.