



# Friends of the Clearwater

## Keeping Idaho's Clearwater Basin Wild

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May 16, 2023

Lolo National Forest  
Attn: Amanda Milburn, Revision Team Leader  
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Submitted via email to: [SM.FS.LNFRevision@usda.gov](mailto:SM.FS.LNFRevision@usda.gov)

Ms. Milburn:

Friends of the Clearwater appreciates the opportunity to provide these comments on the Draft Wilderness Inventory and Wild and Scenic Rivers Inventory and Outstandingly Remarkable Value Evaluation Frameworks for the Lolo National Forest.

### Wilderness and Roadless

Friends of the Clearwater (FOC) supports protecting all Inventoried Roadless Areas (IRAs) with the highest possible protections afforded by the forest planning process for lands outside designated Wilderness. The Forest Service's Roadless Rule and its land classifications do not adequately protect IRAs (*See* Friends of the Clearwater, 2020 for an examination of the way roadless rules are being exploited to extract resources in IRAs, and to downgrade the wilderness values and roadless characteristics of IRAs).

FOC also supports protection at this highest level for uninventoried roadless areas the Forest Service recognizes being within "Roadless Expanses" (USDA Forest Service, 2010e). These are unroaded areas adjacent to IRAs and Wilderness.

We also support protection at the highest level for smaller, discontinuous unroaded/roadless lands as per scientific recommendation. Scientific literature emphasizes the importance of unroaded areas greater than 1,000 acres as strongholds for the production of fish and other aquatic and terrestrial species, as well as sources of high quality water. (Henjum et al., 1994.) A growing number of scientific studies indicate the significant value of roadless areas smaller than 5,000 acres and larger than 1,000 acres. (Strittholt and DellaSala, 2001; DeVelice and Martin, 2001; Loucks et al, 2003; Crist et al., 2005; Nott et al., 2005.) In a Nov. 14, 1997 letter to President Clinton urging the protection of roadless areas, 136 scientists noted:

There is a growing consensus among academic and agency scientists that existing roadless areas—**irrespective of size**—contribute substantially to maintaining biodiversity and ecological integrity on the national forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society,

American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and The Wildlife Society, recommended a prohibition on the construction of new roads and logging within existing (1) roadless regions larger than 1,000 acres, and (2) **roadless regions smaller than 1,000 acres that are biologically significant**. . . . Other scientists have also recommended protection of all roadless areas greater than 1,000 acres, at least until landscapes degraded by past management have recovered. . . . As you have acknowledged, a national policy prohibiting road building and other forms of development in roadless areas represents a major step towards balancing sustainable forest management with conserving environmental values on federal lands. In our view, a scientifically based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and **those smaller areas that have special ecological significance because of their contributions to regional landscapes**.

(Emphases added.)

In a memo dated August 19, 2022 and titled "Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions" the Forest Service directs 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." Wilderness and highly protected roadless lands enhance landscape connectivity, and their locations help to focus planning efforts on landscape measures for prioritizing road removal to enhance connectivity across roaded landscapes, as is featured in Senate Bill 1531, the proposed [Northern Rockies Ecosystem Protection Act](#) (NREPA).

NREPA would designate the remaining roadless areas on federal lands on the Lolo National Forest and in the larger bioregion as Wilderness. Between the core roadless areas NREPA proposes to restore integrity of habitats for the purpose of providing connectivity, within twenty-eight "biological connecting corridors . . . essential for wildlife and plant migration and genetic interchange" totaling roughly 2,358,000 acres. Within these corridors:

The practice of even-aged silvicultural management and timber harvesting is prohibited within the special corridor management areas. . . . ensure that road densities within the biological connecting corridor approach, as nearly as possible, zero miles of road per square mile of land area. Such road density shall not exceed 0.25 miles per square mile. . . .

Furthermore NREPA designates nine "Wildland Restoration And Recovery Areas" covering approximately 1,023,000 acres:

. . . managed so as to restore their native vegetative cover and reduce or eliminate invasive non-native species, facilitate native species diversity to the extent possible with climate change, stabilize slopes and soils to prevent or reduce further erosion, recontour slopes to their original contours, remove barriers to natural fish spawning runs, and generally restore such lands in their entirety to a natural roadless and wild condition.

In valuing large roadless landscapes, protection for areas such as the Great Burn, found in the Bitterroot Mountains along the boundary of the Lolo National Forest and the Nez Perce-Clearwater National Forests would be maximized, enhancing landscape connectivity and protecting habitats for increasingly rare species such as wolverines and mountain goats. This will also encourage migration of grizzly bears into the Bitterroot Ecosystem grizzly bear recovery zone from neighboring recovery zones, deemed essential for overall grizzly bear recovery by the most recent Species Status Assessment by the U.S. Fish and Wildlife Service.

### **Wild and Scenic River System**

FOC urges the planning team to consider American Rivers' [September 2022 Lolo and Bitterroot Wild and Scenic River Eligibility Report](#), which identifies 28 free-flowing streams with Outstandingly Remarkable Values (ORVs) on the Lolo National Forest.

The Rocky Mountain Research Station (Isaak et al. 2015) 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. They suggest that these areas represent the best options for climate smart watershed protections for bull trout and Westslope cutthroat trout, even more heavily underscoring the need for climate refugia to be recognized and protected.

FOC requests the Forest Service apply the Climate Shield data and Climate Refugia as an Outstandingly Remarkable Value (ORV) in consideration of protections for Wild and Scenic Rivers (WSRs) as elucidated in American Rivers comments. Please adopt a Climate Refuge ORV, under the "other" category, and evaluate it within a region of comparison spanning the Intermountain West.

With the direction to "Consider the impacts of Agency actions on ecological connectivity" found in the above mentioned 2022 memo ("Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions") the Forest Service is essentially being directed to consider the value of connectivity for aquatic species depending upon cold water habitats for climate refugia. These include native species such as the Westslope cutthroat trout and bull trout, whose intact habitats have been fragmented by management and other human activities. Proper designation of rivers and streams under the Climate Refugia ORV will help to prioritize protections and restoration actions to maintain and enhance connectivity, all the way from large bodies of water such as large lakes and rivers up to higher elevation, colder habitat refuges in smaller lakes and tributaries.

Thank you for the opportunity to comment.

Sincerely,



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