

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

May 16, 2023

Re: Comments on Wilderness Inventory and Suitability Process for Lolo National Forest Plan Revision

Dear Amanda:

Thank you for the opportunity to comment on the wilderness inventory and suitability assessment for the Lolo National Forest Forest Plan Revision (FPR). The intent of the inventory is to identify lands that may be suitable for inclusion in the National Wilderness Preservation System. The inventory is the first of four phases. It is intended to be reasonably *broad and inclusive*. Evaluation and recommendation for wilderness occurs in later phases.

Direction in FSH 1909.12 Chapter 70 is based on the 2012 planning rule, in which wilderness values are more inclusive than under the 1982 rule. Section 71 guides criteria to identify and create an inventory of all lands that may be suitable for inclusion in the NWPS. At this early phase, direction is to create an inventory that is 'broad and inclusive'. For instance, the presence of roads do not eliminate an area from the inventory, but are included or excluded based on FS road maintenance level, status in prior decision documents, whether decommissioned, or are not regularly maintained, etc. Other improvements including vegetative treatments do not disqualify an area from the inventory, if these are considered substantially unnoticeable.

I support the Lolo-Bitterroot Partnership: A Citizen Plan for Fish, Wildlife, and Forests authored by the Flathead-Lolo-Bitterroot Citizen Task Force and the Friends of the Bitterroot. This document has been presented to Carolyn Upton, Lolo National Forest supervisor. The appendix on pages 21-22 includes 38 areas by name for proposed wilderness on the Lolo. I am including this document by reference.

I also support the Northern Rockies Ecosystem Protection Act (S. 1276, 117th Congress) and want all areas on the Lolo National Forest that are identified in this document to be included in the inventory. The purpose of this act is to prioritize wildlands recovery to help restore biological diversity and native species and to establish a system of biologically connected corridors between core ecosystems in the Northern Rockies Bioregion and ecologically significant wild land to the south, and to protect the ecological integrity and contiguity of major wildlands ecosystems and interconnecting corridors identified, among other purposes. I am including relevant sections of this document by reference.

#### Inventory Process

I understand the inventory process considers existing, relevant information identified during the assessment phase (FSH 1909.12, ch. 10), including information about designated areas (such as inventoried roadless areas), transportation infrastructure (such as road maintenance levels), and past or pending wilderness recommendation proposals. The Lolo National Forest Wilderness Process paper specified previously proposed wilderness areas from the 1986 Lolo National Forest Land Management Plan will be included in the evaluation to ensure consistent documentation of wilderness characteristics as required by the 2012 Planning Rule. Please carry these forward in full.

I trust the team relied on use of management area designations in the existing plan in developing the inventory but it is not clear in the process paper how MAs 11 and 12 were integrated into the inventory. Maintaining the ecological integrity of these areas is critical to a wilderness inventory and evaluation. These also represent the best opportunity to recognize species composition and wildlife habitat that may be under-represented in other parts of the forest.

MA 11 consists of large, roadless blocks of land distinguished by their natural environmental character. They are located throughout the Forest in a variety of terrain and vegetative habitat types. Portions of this Management Area on the Seeley Lake and Thompson Falls Ranger Districts are included in the Forest Service designated essential grizzly bear habitat. This Management Area represents approximately 13 percent of essential habitat on the Forest unroaded blocks. MA 12 consists of the portions of the Forest that have been classified as wilderness or are proposed for wilderness classification.

Lolo Forest Plan Amendment 7 addresses MA 11 and MA 12 specifically. On the Seeley Lake RD the Bob Marshall Wilderness Addition - MA 11 becomes MA 12. Proposed Wilderness boundary change to conform with Lolo National Forest Plan, Record of Decision, page 11 *under Response to Issues, Concerns, and Opportunities*. I want to make sure the boundary and area of MA 12 on the Seeley Lake RD in Monture accurately reflects this change.

### 30X30 direction

In Executive Order 14008, Sec. 216. Conserving Our Nation's Lands and Waters, President Biden directed agency secretaries, Council on Environmental Quality, and the heads of relevant agencies, to recommend steps the United States should take, to achieve the goal of conserving at least 30 percent of our lands and waters by 2030. Currently only 13 percent (13x21) of US lands have adequate conservation protection to meet this goal (US Geological Survey GAP 1 or GAP 2 status). To achieve 30 percent by 2030, another 17 percent, or ~490 million acres, must attain GAP 1 or GAP 2 status. Wilderness is the only designation that meets GAP 1 requirements. In effect it is the gold standard. For the broader issues of climate change and loss of biodiversity it is imperative that all remaining wildlands are recommended. Include all lands in the inventory and evaluation that could potentially be meet GAP 1 or GAP 2 criteria.

### Determinations of substantially noticeable do not support a reasonably broad and inclusive inventory

Determinations of substantially noticeable in Appendix B of the process paper is an arbitrary value. Use of the forest activity tracking system and the time since treatment are not necessarily supported by on the ground conditions. Excluding areas based on these determinations fails to result in an inventory that is reasonably broad and inclusive. Variability on the landscape can influence recovery from disturbance: aspect, slope shape, steepness, elevation, soil type and depth, etc., influence vegetation. While a five year old pre-commercial treatment is going to be somewhat visible, it would be less so by the end of the four plus year span of this revision. More intensive treatments may be but are not necessarily substantially noticeable following the 40 year timeframe shown in Table 14. A clearcut could resemble a high intensity wildfire, a natural process. The 1986 forest plan had visual quality objectives for vegetative treatments, which if observed would have minimized edge effects and linear features.

As a result determinations in Appendix B exclude too much area from the inventory of lands that may be suitable and it prematurely determines these will not be evaluated for wilderness characteristics. As a result of Appendix B determinations, the inventory fails to be broad and inclusive, especially given the absence of a more complete assessment early in the process. Areas excluded based on visual appearance should be assessed for consistency in meeting visual quality objectives of the 1986 Lolo Forest Plan. The inventory should note where treatments failed to meet existing objectives and include these as provisional areas with intent to ReWild or restore by mitigating the damage. In any case a complete assessment should have been done prior to this exercise and must be done prior to excluding any otherwise suitable lands from the inventory.

### Recent and pending projects are eroding potential for wilderness character

There have been a number of recent or pending fuel treatment projects across the forest in response to the so-called wildfire 'crisis'. Decisions for several projects on the Lolo including Sawmill-Petty on the Ninemile Ranger District have amended the existing forest plan in ways that have or could effect the

substantially noticeable determination and/or the wilderness character of the lands. Sawmill-Petty alone would amend 7,076 acres to change Management Area (MA) 27 (land where timber management was not economically or environmentally feasible due to physical features, so these have remained largely untouched) to MA 16 (lands of varying physical environments as determined by soil, slope, aspect, elevation, physiographic site, and climatic factors suitable for timber management), MA 17 (slopes generally over 60 percent and best managed from an economic criteria with a low road density), MA 18 (managed to attain a balance of cover and forage for big game through regulated timber harvest), MA 23 (timbered lands on south-facing slopes, with medium visual sensitivity, with developed road systems), and MA 25 (lands with a medium degree of sensitivity, which are available for timber management), or other designations. Some of the area in Sawmill Petty is adjacent to or in the vicinity of the Burdette and/or Petty Mountain inventory roadless areas (IRA). Please access all the project or forest-wide amendments that are or would have decreased the potential wilderness character.

Add to these amendments the trend toward shared stewardship management with potential conflicting values and missions of the forest service with Montana state and other entities. This includes recently paying federal dollars to the MT DNRC to perform project NEPA. Programs such as Good Neighbor Authority with state, county, and other entities under 2014 and 2018 Farm Bills could unnecessarily exclude otherwise suitable areas from the inventory. In the assessment please address the impact of authorities under shared stewardship on ecological integrity important to wilderness character.

### Connectivity and Climate Change

Designated areas including Research Natural Areas, Inventoried Roadless Areas, Botanical Areas, Wilderness Areas are core to connectivity. All such designations should be carried forward in the Inventory. Climate change will likely effect physical and biological processes and attributes within wilderness and compromise the degree to which effected areas function as a refuge and amplify the need for some species to migrate. I urge the Lolo NF to address this threat to ecosystem function by including in the wilderness inventory, any potentially suitable lands that serve to secure functioning habitat for migrating species. Results of a FS evaluation of RACR, “highlight the value of inventoried roadless areas toward maintaining a representative network of relative undisturbed areas that function as conservation reserves supporting a diversity of plant and animal species.” Roadless protection would protect biologically valuable low-elevation roadless areas and compliment existing protected areas<sup>1</sup>.

The 5000-acre minimum size criteria is too limiting. The spatial arrangement of remnant unroaded lands and/or restoration of more developed lands is as critical as size in creating corridors f.

### Threatened and Endangered Species

The Lolo National Forest is home to several threatened or endangered species listed under the Endangered Species Act. The inventory should include any areas that protect or facilitate recovery of listed species. In particular, as a vital conduit for grizzly bear through natural recolonization. The Lolo NF is a connectivity hub that surrounds development and population growth in the Missoula Valley. The public lands of the Lolo NF are critical for connectivity that serves the broader landscape. The Ninemile Demographic Connectivity Area is a key component of the Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy (CS) and all available lands should serve as stepping stones. Sapphire range is also needed for connectivity and any suitable lands should be included in the inventory.

---

<sup>1</sup> Turner, James Morton, 2006. Conservation Science and Forest Service Policy for Roadless Areas. Conservation Biology V. 20, No. 3, 713-722. June 2006.

## **Wild and Scenic Rivers**

Include all 28 rivers found to be suitable for Wild & Scenic classification in the American Rivers Analysis. Include presence of bull trout and west slope cutthroat trout as outstanding remarkable values. Also include presence of beaver as an outstanding remarkable value, including in the Ninemile. Include geologically driven subsurface cold water recharge areas such as in but not limited to Monture and other creeks emerging from Swan Range as an outstanding remarkable value.

Respectfully,

*/Claudia Narcisco*