Please accept these comments from the Ninemile Wildlife Workgroup to the Lolo National Forest Plan Proposed Action.

The Ninemile Wildlife Workgroup is a group of Huson/Ninemile/Alberton residents and other parties committed to promoting knowledge and stewardship of wildlife and habitats within these communities and surrounding public lands. Details about us can be found on our website: http://www.ninemilewildlife.org/.

The following are excerpts from the Lolo National Forest Land Management Plan Preliminary Need to Change Document (January 2024):

2.2 Required Plan Content

- *Maintain ecological sustainability and connectivity to provide diversity of plant and animal habitat communities and support the persistence of native species.*
- *Provide ecological conditions that contribute to the recovery of threatened and endangered species that occur on the Forest.*

4. Address Gaps in Current Plan Direction

4.2.1 Ecosystem Integrity There is a need—To provide management direction that addresses the importance of habitat connectivity, landscape patch and pattern, and wildlife-linkage zones between landscapes.

4.2.2 Species Diversity There is a need:

- *For the plan to incorporate the latest grizzly bear management science and policy, and address the role that the Lolo National Forest plays in providing connectivity to the Bitterroot Ecosystem Expansion Area*
- *For plan content that reflects the road system impact on federally listed species.*

The proposed action on page 8, states "*Due to its landform and juxtaposition in the landscape, the Lolo plays a crucial role in providing habitat connectivity across western Montana between ecosystems and habitats for many species. For example, the Lolo provides corridors between three of the identified grizzly bear recovery ecosystems; the Northern Continental Divide Ecosystem, the Cabinet Yaak Ecosystem, and the Bitterroot Ecosystem. The Lolo National Forest connects to lands managed by seven other National Forests and Flathead Reservation as well as lands managed by State agencies, the Bureau of Land Management, and private landowners."*

The preceding illustrates the important role that the Lolo National Forest plays to maintain ecological sustainability and species diversity in the Rocky Mountains. **The Lolo Forest Plan revision needs to prioritize connecting habitats and populations to maintain its unique and important role as an intact ecosystem and connectivity hub**. This is especially critical considering the threats posed by changing climate and ecological conditions, human population growth, and development.

Issues

We would like to recommend changes in the preliminary issues of Appendix A of the proposed action scoping letter. Currently issue 1, ecosystem integrity and management, plans to assess some ecosystem measures with timber volume, fire, and fuel objectives. Issue 3, social and economic sustainability, measures similar parameters that are in issue 1 but does not include ecosystem integrity measures. Social and economic sustainability requires a healthy ecosystem.

To fairly compare issues 1 and 3, the economic benefits and costs of all activities should be measured against the benefits and costs of maintaining or restoring ecosystem integrity or ecosystem services. The attached document, Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis, Office of Information and Regulatory Affairs, Office of Management and Budget, February 28, 2024, and its references should be used as direction for doing these analyses.

Acquired Land Restoration Emphasis Areas

We appreciate that many thousands of acres have been added to the Lolo National Forest public lands. Some of these recently acquired lands could be important to at-risk species and contribute to connectivity and watershed health. We support desired condition 1 (page 94) “The legacy road system on acquired lands does not degrade aquatic ecosystem, watershed function, or ecosystem connectivity”. We feel some of the acquired lands, because of their location (i.e. Petty Creek), could provide key habitat and connectivity improvement opportunities.

There should be an additional desired condition that these acquired lands will contribute to connecting landscapes and healthy aquatic and terrestrial ecosystems.

We propose an additional goal that the Lolo National Forest works with State and federal agencies, Tribes, and other partners to promote the recovery of listed and at-risk plant and animal species.

Connectivity

The third connectivity goal on page 27 of the proposed action should also allow for funnel fencing to direct animals to new or existing crossing structures.

We support the well-done management actions and strategies in the connectivity section in Appendix 3.

Connectivity is mentioned in preliminary issue 1 of Appendix A of the proposed action scoping letter, as well as numerous times throughout the proposed action documents. There is also executive guidance "Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors", March 21, 2023, that directs Federal agencies to promote greater connectivity and states on page one that Increasing connectivity is one of the most frequently recommended climate adaptation strategies for biodiversity management. To meet this direction and as the Lolo National Forest is the linchpin connecting multiple habitats, listed species populations, and jurisdictions, **connectivity should be elevated to a stand-alone issue**.

Measures and plan content around this issue should include:

- Number, size, and distribution of connectivity linkage areas.
- Within connectivity linkage areas, open motorized route density and total motorized route density should be at levels that enable the movement of wide ranging carnivores to other populations and elk between summer and winter ranges.
- When projects requiring additional roads are within connectivity linkage areas, open motorized route density and total motorized route density should be restored to pre-project levels within 1 year after completion of the project.

To help terrestrial species connectivity **there should be an additional management area (MA) named <u>wildlife corridors</u>**. These wildlife corridor MAs would be designed to maintain habitat linkages between relatively protected wilderness, recommended wilderness, inventoried roadless, backcountry, and grizzly bear demographic connectivity areas (DCAs). Recreation Opportunity Spectrum (ROS) areas categorized as primitive or semi-primitive non-motorized also provide relatively secure habitat. These proposed MAs and ROS areas along with the existing DCA can act as steppingstones connected by wildlife corridor management areas to promote connectivity.

I-90 is a significant connectivity barrier and source of wildlife mortality running through the Lolo National Forest. When assessing connectivity, identifying existing and potential highway crossings should be considered as should other barriers like state highways, railroads and development. Successful connectivity would require several pathways or wildlife corridors where porosity exists through barriers that link secure habitats.

Wildlife Corridor Management Areas would emphasize landscape connectivity for wide ranging carnivores and ungulates. Connectivity is the degree to which the landscape facilitates or impedes wildlife movement among relatively secure wildlife resource patches described above.

Some suggested Desired Conditions for these wildlife corridors could be:[1]

- Road densities and infrastructure improvements would remain the same or be reduced to enhance wildlife habitat effectiveness.
- Habitat conditions provide security and refuge from stresses and threats while meeting the needs for feeding, breeding, sheltering, and moving in all seasons.
- Human disturbance does not limit habitat connectivity.

[1] These desired conditions, standards and guidelines were mostly pirated from other forest plan revisions.

- Secure habitat provides connectivity for wide ranging carnivores and ungulates.
- To the extent possible, wildlife and fish are free from harassment and human disturbance at a scale that impacts vital functions (e.g. seasonal and daily movements, breeding, feeding, and rearing young).

Some suggested Standards or Guidelines for these wildlife corridors could include:

- Vegetation management activities should include design features to maintain, enhance or restore habitat connectivity.
- Mechanize access will not increase and year-round mechanized travel will be restricted to designated routes.
- Retain connections of at least 400 (or greater) feet in width to at least two other [late-successional/old growth] stands.
- Connections should occur where medium diameter or larger trees are common, and canopy closures are within the top one-third of site potential.
- The length of connecting corridors should be as short as possible.
- Understory should be left in patches or scattered to assist in supporting stand density and cover.
- Adding to the current designated system of roads for public access is prohibited.
- Temporary roads that support ecosystem restoration activities, fuels management, or other short-term projects must be closed and rehabilitated immediately upon project completion, to protect watershed condition, minimize wildlife disturbance, and enforce the prohibition of illegal motorized use.
- New or reconstructed fencing must allow for wildlife passage, except where specifically intended to exclude wildlife (e.g. funnel fencing to direct animals to crossing areas) or to protect human health and safety.

Geographic Areas

We appreciate geographic area specific information as it enables the public to get a summary of the features, characteristics, and management direction of areas important to them. We will comment on the Middle Clark Fork and the Ninemile/Petty Creek geographic areas (GA) as they are within our mission area where we live and play.

Middle Clark Fork Geographic Area

We support the Hoodoo IRA becoming recommended wilderness in the proposed action. This category will best ensure protection for at risk species including several federally listed plants and animals, and some Lolo listed species of conservation concern.

The Middle Clark Fork GA made no mention of the Ninemile Demographic Connectivity Area (DCA) as it was noted in the Ninemile/Petty Creek GA as a contributor to Ecological Roles and Contributions. The Ninemile DCA occupies almost all the Middle Clark Fork GA north and east of the Clark Fork River and should **include verbiage and direction like what was written on page 139 of the proposed action for the Ninemile/Petty Creek GA. Section 3.5.4 Emphasis Areas and Other Features should note the numerous desired conditions, standards and guidelines contained within Appendix 9: Grizzly Bear Plan Direction.**

One relatively unique feature within the Middle Clark Fork GA that warrants pointing out is the 35,317 acre Fish Creek Wildlife Management Area (WMA). This popular WMA is dedicated to the protection and perpetuation of fish and wildlife resources. This WMA and the adjacent Fish Creek State Park areas are within and adjacent to Lolo NF lands and contribute significant recreational, fish and wildlife values to the Middle Clark Fork GA. **The WMA will contribute to terrestrial and aquatic wildlife connectivity and should be considered when assessing wildlife connectivity in the Lolo National Forest plan**.

Hoodoo Pass and Heart Lake are the commonly used spellings that should be changed at the bottom of page 137 of the proposed action.

Ninemile/Petty Creek Geographic Area

Reservation Divide was recommended wilderness in the Lolo National Forest Land Management Plan Draft of 2006. What changed since then to not include this area as recommended wilderness in the new proposed action? This relatively remote secure ridgeline area is commonly occupied by grizzly bears, has large ungulate populations, including moose that are protected from hunting. It is unsuitable for timber production and has high desired scenic integrity. Approximately 20 percent of the area is whitebark pine potential habitat. While hiking there, we've noted large healthy western white pine trees, a once common feature of the landscape prior to the introduction of blister rust and a focal species on the Flathead National Forest. It borders a sizable portion of the Flathead Indian Reservation which may have culturally important features such as Cha-paa-qn Peak. **Reservation Divide IRA should be reconsidered for recommended wilderness** to best protect these values and provide secure habitat and enhanced connectivity for wide ranging carnivores and ungulates.

Page 139 of the proposed action states "*The Fish Creek area contains multiple inventoried roadless areas but also provides motorized access near the Stateline Trail. The Fish Creek Wildlife Management Area is present on State lands within this GA, which provides recreation opportunities that are distinct from nearby inventoried roadless areas*". On the same page is another statement "*One of the largest all-native mountain goat herds in the U.S. can be found in the Great Burn area on this GA*." Both statements should be moved to the Middle Clark Fork GA.

The two sets of bridges on I-90 nearest the Ninemile exit are natural passageways that wildlife such as grizzly bears and elk use to cross this barrier. Sixmile Creek at I-90 is also being considered to improve wildlife and fish passage with new infrastructure. Much of the region from Sixmile Creek to the existing bridges is protected public land. The private land has many conservation easements or restrictions on development because it is within the floodplain. These conditions increase successful wildlife passage between the Ninemile and Petty Creek drainages.

The Ninemile DCA offers habitat connectivity protections to this potential crossing of the I-90 barrier at Sixmile Creek. Wildlife connectivity could be improved by either expanding the DCA to include Petty Creek or linking the DCA to a connectivity landscape of the many relatively secure MA's and ROS protections on the Petty Creek side linked by wildlife corridor management

areas. **Management in the Petty Creek drainage should emphasize wildlife connectivity** between the Ninemile DCA and the Hoodoo area helping to connect the Northern Continental Divide and Bitterroot ecosystems. Petty Creek has many blocks of acquired land restoration emphasis areas. Some of **these acquired lands should have wildlife connectivity as a desired condition and a restoration goal.**

Grizzly Bears

The beginning paragraph of Appendix 9, Grizzly Bear Plan Direction states "*The following plan components support continued recovery of the grizzly bear and would be amended as needed to be consistent with updates to new and existing ecosystem direction or conservation strategies (upon recovery and subsequent removal from the Federal list of Threatened and Endangered Species) over time."* The text in the parentheses appears biased and should be dropped. We do not know that the grizzly bear will be delisted soon and the Bitterroot Grizzly Bear EIS that is currently underway may also impact Lolo National Forest direction. Most biologists believe grizzly bears need to be able to move between existing separated populations for long term genetic viability. Existing or similar primary conservation area, zone 1, and DCA desired conditions, standards, and guidelines allow continued grizzly bear occupancy and contribute to connectivity and should be retained with the new forest plan. **Expanding the area of zone 1 and the DCA should be considered to improve conditions for grizzly bear connectivity between existing populations.** Improving conditions for grizzly bears benefits multiple species including other wide-ranging carnivores and elk.

Wolverines

The wolverine was only recently listed as threatened and direction is forthcoming from the Fish and Wildlife Service. We expect there will be direction on wolverine connectivity and critical habitat especially in high elevation areas of the Lolo National Forest. This direction could influence winter recreation, especially for over-snow vehicles, as protection of natal denning habitat from human disturbance may be critical to recovery. The proposed action only mentions wolverine twice, with one desired condition (page 45) "*Suitable wolverine material habitat is widely dispersed throughout the forest…"* We suspect you meant maternal habitat and that there will be many additional plan components forthcoming from consulting with the Fish and Wildlife Service.

Appendix 1

Existing important wildlife designations should be available on the maps to aid analysis. These would include lynx analysis units, big game winter range, and grizzly bear primary conservation area, zone 1, and DCA designations.

Appendix 2

Table A2.3 shows that motorized vehicle use and temporary road construction are both suitable uses in IRAs. These should be changed to Y/N or potential uses in some areas.

Monitoring

We support the extensive monitoring proposed in section 5.3. We noted a spelling error (underlined) in *IND-SDIV-09: Number, location, cause, fgedand resolution of wildlife/ human conflicts.*

Please add the following additional monitoring items. **Quantifiable information on the changes in density of roads and trails open to public motorized use on NFS lands as required in the Grizzly Bear Amendment is a key component that should be included in the DCA. Similar measures of road and trail densities should be added in the wildlife corridors or connectivity areas.**

We appreciate the work you are doing on plan revision and your consideration of our comments.

Sincerely,

Pat Sweeney

Board Chair
Ninemile Wildlife Workgroup
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References:

Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis, Office of Information and Regulatory Affairs Office of Management and Budget, February 28, 2024.

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