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April 1, 2024  
Amanda Milburn  
Lolo Forest Revision Lead  
24 Fort Missoula Road  
Missoula MT 59804

**RE: Lolo National Forest Plan Revision Proposed Action**

Ms. Milburn,

This letter transmits comments from Montana Trout Unlimited (MTU) and Trout Unlimited (TU) (collectively referred to in this letter as “TU”) on the Lolo National Forest (LNF) plan revision proposed action document. We appreciate the opportunity to participate.

TU represents 300,000 members and supporters across the country. MTU represents the organization’s 4,000 members, supporters and 13 TU chapters in Montana. TU’s mission is to conserve, protect and restore coldwater fisheries and their watersheds. Our members have a passion for the conservation of coldwater fisheries located on the Lolo National Forest, as well as waters located downstream from the forest. Additionally, Trout Unlimited project managers have worked closely with the Forest Service for decades on fisheries restoration, riparian habitat and historic mine cleanup projects on the Forest and greatly appreciate the partnership.

Overview

The current Lolo plan was last revised in 1986, 38 years ago, during which time much has changed on the Lolo National Forest. Industrial uses, how we manage native fish and wildlife species, understanding impacts of climate change, and concerns about water quality and quantity have either changed or have become more apparent. The LNF is home to many native, sensitive, or threatened aquatic species, including bull trout and westslope cutthroat trout. While TU supports the importance the proposed action places on priority watersheds, native species conservation and restoration, we believe there are still areas that could be expanded on and strengthened to ensure aquatic ecosystems and habitat are protected in the LNF plan for decades to come. The following comments are meant to assist with the areas we see as needing additional information to strengthen the goals and objectives of the plan.

## Westslope Cutthroat Trout (WCT)

Genetically intact populations of westslope cutthroat trout were once widely distributed across the Lolo National Forest. However, the populations of our state fish have dramatically declined over the past century mainly due to competition and hybridization with non-native species like rainbow trout, obstruction of connectivity by transportation corridors, and more recently the effects of a climate change. It is estimated that WCT occupy only 5% of their historic ranges in Montana. Declines in distribution and abundance of WCT led to its designation as a Species of Special Concern by the State of Montana and the Montana Chapter of the American Fisheries Society, a Sensitive Species by the U.S. Forest Service, and a Special Status Species by the U.S. Bureau of Land Management. Due to the sensitive nature of this native species, TU has several concerns about how the revision team has proposed to manage and designate WCT in the proposed action document.

Most significantly, it is concerning that WCT have been left off the Species of Conservation Concern (SCC) list with the justification that WCT have sufficient numbers across the LNF. While there may be higher total numbers of WCT across the LNF than elsewhere in Montana, the majority of these populations are not genetically intact and are in fact hybridized or genetically altered from other non-native trout species. The LNF must prioritize the conservation of genetically unaltered WCT populations to ensure that potential impacts to WCT are reviewed and mitigated when planning future projects on the forest, and continue emphasizing the importance of this native species. According to the MOU and Conservation Agreement for WCT and YCT in Montana “in order to conserve cutthroat trout we must significantly reduce threats to existing populations prioritized by conservation value (i.e., genetic purity, life history, local adaptation), increase their spatial distribution and abundance, and protect the genetic integrity of non-introgressed populations.” A simple, yet meaningful step towards achieving this is by adding WCT to the SCC list.

Another area of concern for WCT is under the appendix 4 priority waters list it states that “the identification of future priority watersheds will be determined based on the restoration need for the watershed, focusing on improving SCS habitat (primarily bull trout habitat)...”. While we completely agree with bull trout habitat being a focus when identifying priority waters, WCT habitat must be included as well.

In addition to other areas of conservation and restoration focus of WCT, TU would also recommend adding a section or objective on the reintroduction of genetically intact populations of WCT into habitat that may be isolated or protected from non-native species by passage barriers. We see other Forests around the state implementing these projects with great success.

Lastly, TU recognizes all the hard work, time and resources that have gone into conserving, restoring, and protecting WCT populations and habitat on the LNF. It is because of these efforts that we have concerns and make these recommendations. Now is not the time to pull back our efforts just because we view our past work as successful. We must double down and continue the good work in protecting WCT from ongoing and future stressors like climate change. Failing to include WCT on the SCC list or in the analysis of priority waters habitat jeopardizes the gains made by past efforts.

## Bull Trout

Bull trout are listed as a threatened species under the ESA due to drastic declines in population and distribution. The LNF is one of the last strongholds for bull trout and thus should take every action to ensure the protection and conservation of this important species. TU supports and is encouraged by the number of goals and objectives set out by the proposed action for bull trout restoration and protection, along with using the Bull Trout Recovery Plan as a reference. We would simply recommend the continued collaboration with state and tribal agencies, and other stakeholder groups on bull trout recovery and conservation.

## Priority Waters and Conservation Watershed Networks

The USFS 2012 planning rule requires that land management plans identify watersheds that are a priority for restoration and maintenance. This rule specifically directs the LNF to restore degraded watersheds by strategically focusing investments on watershed improvement projects and conservation practices at landscape and watershed scales. TU appreciates the addition of the Watershed Condition Framework map included in Appendix 4 and views it as an important tool in restoration work.

TU agrees with and supports the list of priority watersheds listed in table A4.2. TU has spent many years and resources on the Nine mile/Petty Creek project area and appreciates the acknowledgement. TU would like to make the recommendation, as we do in previous sections, that along with bull trout other native and sensitive species such as WCT must be evaluated when priority waters are designated in the future. Additionally, TU recommends closely working and collaborating with state agencies like Montana Fish, Wildlife, and Parks, who are also working in these watersheds, when setting goals and priorities in each watershed.

Lastly, while wildfire is mentioned, it does not appear that prescribed fire and timber management is mentioned in Appendix 4. While TU is aware that timber management and prescribed fire are a priority on the LNF and in the plan, we recommend the proposed action have goals, objectives, and standards addressing these issues in the priority watersheds, CWN, and Riparian Management Zones sections. Timber management and prescribed fires can have both a positive and negative impact on watersheds, and we recommend it be addressed.

## Connectivity

The 2012 planning rule lists connectivity as a component of a healthy ecosystem, and it is integral to achieving the requirements of the revised plan to provide for ecosystem integrity. Connectivity is just as important for aquatic species as it is for terrestrial species, if not more so. Due to historic timber practices in the LNF, transportation corridors and culverts have been the primary barriers to fish movement and aquatic connectivity issues. Many years of work with cooperating agencies like the US Fish and Wildlife Service, MT FWP, and groups like Trout Unlimited has resulted in dozens of culverts and barriers being removed or replaced and species like WCT moving back into headwater tributaries and historic spawning grounds. TU supports the continued efforts of the LNF and the objectives in the

proposed action to reconnect at least 3 miles of aquatic habitat every five years by removing human-caused barriers to the free movement of aquatic species.

However, there are times when a barrier, either constructed or natural, can be put to good use even if it does impede fish movement. As mentioned in our previous comments, the LNF should consider and outline objectives in the plan regarding reintroduction of genetically intact WCT populations, taking individual WCT from threatened streams and transferring them to streams that are known to be free and protected from non-native species. These types of projects are currently taking place on the Helena-Lewis and Clark Forest in two different watersheds, where they are translocating genetically unaltered WCT populations to isolated headwater streams that are blocked by a historic road acting as a barrier. Other Forests in Montana have or are engaged in similar translocations that include newly constructed fish barriers. Should there be an opportunity to secure or restore robust, genetically unaltered populations of WCT using natural or constructed fish passage barriers, the LNF should have all tools at their disposal to protect those populations. While one of the main missions of TU is reconnection of streams, we would not want that emphasis to eliminate the option of building a barrier to protect native fish.

### Monitoring

According to the 2012 planning rule, “the Forest Service has discretion to set the scope, scale, and priorities for plan monitoring within the financial and technical capabilities of the administrative unit.” Monitoring items set out in the 2012 planning rule include but are not limited to:

- The status of select watershed conditions.
- The status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems.
- The status of focal species to assess the ecological conditions
- The status of a select set of the ecological conditions required to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern.

Active monitoring of bull trout, WCT, and watershed conditions must be an objective in the forest plan, which is the only way to ensure that management objectives are working over the long term. State agencies like the Montana Department of Environmental Quality, Montana Fish, Wildlife, and Parks, and the Department of Natural Resources all have water quality, water quantity, and fisheries monitoring programs. Monitoring programs in coordination with those state agencies would take some of the technical and financial strains off the Forest Service. Articulating broad monitoring requirements, especially for actions in RMZs (including prescribed fire), should be included in this proposed action document and resulting revised forest plan. In our discussions with LNF staff working on this plan, we heard interest in exploring the possible benefits of selective actions, such as thinning, in RMZs. Any actions proposed in RMZs or sensitive areas should be based on sound science showing the action’s effectiveness in conserving or restoring the health of riparian habitat and aquatic species. When such

scientific evidence is lacking, any experimental actions should come with long-term monitoring requirements to assess the action's beneficial (or harmful) impacts on riparian and aquatic health. That monitoring and the results must be completed and confirmed before similar actions are carried out elsewhere in RMZs or sensitive areas.

### Energy and minerals

While, according to the LNF revised assessment, "current and forecasted interest in mineral development across the forest is relatively limited", TU believes it is important to have strong goals and standards in the forest plan to regulate and manage any future energy and mineral projects on the forest. On page 101 of the proposed action, under Guidelines, we suggest strengthening the language in #2 and #3 by stating "new activities must not compromise..." and "adverse effects to aquatic and riparian resources must be minimized...". Using stronger language in the plan leaves less room for questions of how mining operations must operate in watersheds and riparian areas.

In addition to any new potential projects, abandoned mines sites and negative effects from legacy mining that litter the LNF should be a focus of the plan with remediation and restoration in the goals and objectives. TU is glad to see objectives on page 100 of the proposed action that "Improve 1-3 abandoned mine sites every 3-5 years, restoring native vegetation, soil productivity, wetlands, or stream/floodplain structure and function."

A useful tool to have in the forest plan, to assist with the remediation work on legacy mines, would be an updated inventory of historic and abandoned mines on the forest, along with any active proposals or projects. This could easily be done in coordination the Montana Bureau of Mines and Geology, who work on mapping the entire state with this data. TU would recommend there be a section in the plan, under Energy and Minerals, with this objective.

### Conclusion

Thank you for the consideration of our suggestions and input on the proposed action document. We hope that the planning team finds our comments helpful, and we look forward to working with the Lolo Forest revision team throughout the remainder of the revision process. If you have any questions, please do not hesitate to contact me.

Sincerely,



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