

**MISSOULA COUNTY COMMISSIONERS**

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Apr. 1, 2024

Amanda Milburn  
Team Leader: Lolo Plan Revision  
2880 Skyway Drive  
Helena, Montana 59602

RE: Scoping Comments for the Proposed Action for the Lolo National Forest Land Management Plan

Dear Ms. Milburn,

Thank you for the opportunity to comment on the scoping notice for the Proposed Action for the Lolo National Forest Land Management Plan. Missoula County plays an important role in the management of our natural resources, which intersect with the activities of the Lolo National Forest. We have programs focused on wildfire preparedness, invasive species management, outdoor recreation, climate change and adaptability, the management of open lands and land use. We collaborate closely with the Lolo National Forest on many of these programs, and as a cooperating agency for this planning process, we appreciate the level of engagement extended by the Lolo team directly to the County. The commendable level of community outreach and transparency demonstrated by the Lolo team is noted, and we look forward to discussing our comments in greater detail as you progress toward the development of alternatives.

Our comments in this letter are organized by topics related to the programs we administer that interact with the Proposed Action:

**General Plan Comments**

Missoula County is part of or leading several partnerships and collaborative efforts that involve the Lolo National Forest, such as the Front Country Cooperative and River Ambassador Program. Throughout the plan, several goals discuss working with state, federal, and local agencies. These goals align with the subject areas that Missoula County operates within, and we fully support these objectives. It would be beneficial for both agencies to explicitly include counties in that list, as counties often intersect with the Lolo National Forest as peers in management activities—a relationship that is likely to become even more pronounced as the population of Western Montana continues to grow. This inclusion would also communicate to the public that their locally elected officials do, indeed, have a relationship with your federal agency.

The lack of workforce housing for county, state and federal agencies is a shared concern. Summit County, Colorado, is developing a unique housing partnership with the White River National Forest to establish workforce housing on an administrative site benefiting multiple agencies. Missoula County is interested in exploring a similar partnership with the Lolo National Forest. If deemed appropriate for the plan, Missoula County would support the inclusion of

workforce housing development, with consultation with local permitting agencies, on administrative sites.

### **Fire, Fuels and Wildland Urban Interface (FFW)**

Reducing wildfire risk to communities is a high priority for Missoula County. The County has recently increased capacity and implemented programs to address risks to the built environment and natural resources on and off private lands. These programs include the goal of working with homeowners to prepare their homes and clear flammable materials, especially around the first five feet of structures to reduce ember vulnerability and prevent potential conflagration. As the climate continues to change, we must mitigate risk by increasing the resilience of our communities and structures.

Missoula County appreciates the discussion about collaboration with partners in accomplishing fuel reduction projects "on both sides of the fence," as referenced by the Lolo Ecosystem Action Plan (LEAP). The County's current work focuses on the "Home Ignition Zone" (HIZ) and how collaboration can significantly reduce the impacts of wildfire at the neighborhood level. Goals in the Proposed Action concerning coordinated project development, communication, planning, treatments and fire-resistant buildings are mutually beneficial to our public.

The idea of "community protection" versus "reduced risk" to communities through fuel mitigation work requires further discussion. The term "community protection" could be confusing to the public if they perceive it as synonymous with structure protection. Alternatively, if one considers community protection as encompassing not just homes but the entire landscape, including forest health, then is community protection appropriate? Perhaps "protection" is not the most suitable term when addressing community impacts or any other interest, and the focus should instead be on reducing community risk. In fire contexts, "protection" can only truly be used in the past tense (e.g., "we used direct suppression efforts to protect that neighborhood").

### **Climate Change and Adaptability**

We are excited to see the many ways in which climate change is integrated throughout the planning document. It truly appears to be an intersectional approach. Missoula County is committed to building climate resiliency and advancing climate change mitigation efforts. Our policy and planning goals are demonstrated in our county-wide resiliency plan, Climate Ready Missoula, as well as our goals of 100% Clean Electricity by 2030 and Carbon Neutral County Operations by 2035. There are numerous areas in the Lolo National Forest Plan that are in alignment with our adopted policies and plans.

The plan's objective of establishing refugia for terrestrial and aquatic species is in alignment with Climate Ready Missoula, and we support this approach, especially for key species such as bull trout. We also support the numerous proposed actions that speak to the intersection of climate change and recreation, which advances Climate Ready's goal of "Prepare tourism and recreational industries for changing climate."

In the areas of the plan that consider ecological transformation, such as adjusting stocking levels for a habitat that is warmer and drier or planting species that are more tolerant to future climactic conditions, we ask for robust public engagement. Given the uncertainty of what ecological transformation will look like, we believe this is an area where multiple constituencies should come together to discuss potential management approaches. On this note, we also ask that research natural areas be used to better understand ecological transformation, not just

succession. Climate Ready Missoula acknowledged the importance of this in the following goals:

- Build understanding of forest, terrestrial and aquatic ecosystems and appropriate, site/landscape specific management options that account for climate change.
- Analyze current, historical and projected conditions to identify and prioritize where to resist, accept or facilitate site or ecosystem change, considering cultural values.

Lastly, we support the plan's proposed actions related to integrating traditional ecological knowledge. This is an important point of the bullet point above, as well as reflects one of Climate Ready Missoula's guiding principles, "Draw on tradition and culture: Honor cultural values and draw on traditional ecological knowledge through collaborative partnerships."

### **Invasive Species Management**

Missoula County is supportive of the approach to invasive species management. The language in the proposed action regarding invasive species management is very sound and avoids focus on eradication. A focus on eradication has limited the scope and availability of project funding for broader scope of tools like biocontrol, survey, education/public outreach and revegetation. This approach to Integrated Pest Management allows a variety of actions to count toward the acreage thresholds. The Department of Ecology and Extension has a variety of programs focusing on biocontrol, aquatic invasives, pollinator research, education and outreach and prevention. The proposed action aligns well with Missoula County's approach.

### **Pollinators**

The discussion on the impact of special use permits for apiaries and their influence on native pollinators is commendable; however, the emphasis on using monarch butterflies as the symbol of "at-risk wildlife" seems less effective given our geographical location, which lies outside the primary ranges of both eastern and western flyways. Instead, the plan should consider a focus shift towards at-risk pollinator species reliant on local habitats, such as the Western bumblebee (*Bombus occidentalis*), which may face listing as an endangered species this year. These species are integral to the forest's ecosystem and warrant greater attention in our conservation efforts.

### **Traditional Ecological Knowledge**

The use of traditional ecological knowledge, particularly in the background information, is commendable. We see an opportunity to further enhance traditional ecological knowledge into the glossary definitions of essential measures linked to ecological site descriptions, ecological diversity, sustainability and the broader concept of ecological knowledge. By incorporating traditional ecological knowledge into these definitions, we can enrich our understanding and appreciation of these key concepts, fostering a more comprehensive and inclusive approach to ecological management and conservation efforts.

### **Connectivity**

Connectivity plays a pivotal role in Missoula County's approach to conservation and environmental stewardship. The County has developed land use policies centered on preserving wildlife movement corridors, a strategy implemented through zoning regulations in the Missoula Valley. Collaborating closely with state and local agencies, we have directed

efforts towards enhancing highway crossings to facilitate safer wildlife passage. Additionally, Missoula County has established a longstanding and robust open space bond program, aimed at safeguarding vital open lands. Recognizing the significance of connectivity in the face of climate change, the Climate Ready Missoula plan adopted by the County in 2020 emphasizes the importance of maintaining interconnected habitats for both terrestrial and aquatic species, underscoring their commitment to ecological sustainability and adaptation. Missoula County recognizes the connectivity portion of the plan is needing more detail and will continue to be expanded. We are looking forward to working with the Lolo National Forest on this important topic and are happy to share our contacts with the Montana Department of Transportation that have been working on wildlife connectivity with us.

Situated at the intersection of multiple ecosystems, the Lolo National Forest holds a pivotal role in preserving biodiversity and ecological connectivity in Missoula County. We recognize the need for more detailed discussion on this topic in the plan, and the County is committed to collaboration with the Lolo National Forest on this effort. In line with this vision, Missoula County aims to work collaboratively with landowners and other stakeholders to acquire or manage non-federal lands identified as crucial for maintaining connectivity, while also collaborating with agencies to identify and address impediments to connectivity. You should expand objectives in the plan on aquatic habitat to include terrestrial habitat. Furthermore, you will need to broaden guidelines for connectivity initiatives to provide more comprehensive guidance, and you will need to develop prioritization strategies based on ongoing land conservation efforts in adjacent areas.

### **Acquired Land Restoration Emphasis Areas**

Over the past few decades, collaborative efforts to transfer newly acquired lands to federal management agencies have been significant, often involving consultation with or participation from Missoula County. The proposed guidelines for new acquisitions suggests assigning management areas and recreation opportunities compatible with surrounding lands. While this approach suits small, isolated acquisitions, it may prove less effective for contiguous, large additions. There may be a need in the plan for guidelines that offer flexibility to assess various factors such as existing conditions, available resources, potential habitat values, connectivity, adjacent land use (both public and private), collaborative efforts and unique opportunities to meet community needs for larger acquisitions. It is imperative to clearly delineate the differing approaches required for small/isolated acreages compared to large, contiguous additions, ensuring that management strategies are tailored to the specific characteristics and objectives of each acquisition.

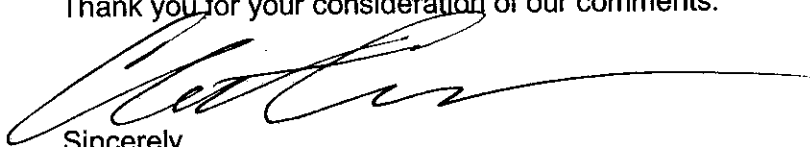
### **Outdoor Recreation**

Outdoor recreation opportunities and the benefits they provide to Missoula County residents and visitors alike are extremely important to communities throughout the county. The Lolo National Forest is a key agency in providing and sustaining these opportunities both on lands administered by the Forest Service and through partnership and collaboration with other management agencies and jurisdictions to meet the needs of communities. The River Ambassador Program and Front Country Cooperative are examples of this type of collaboration. The ever-evolving and increasing demand for public access and associated recreation continues to push agencies and jurisdictions to become increasingly nimble in problem solving and creative in establishing a shared vision for how to meet the diverse needs and values expressed by our public. Emphasizing a commitment to continued future collaboration and

increasing the ability of the Forest Service to be as nimble and creative a partner as possible will be important to finding solutions that can meet community needs into the future.

More specifically, as the planning process moves forward, the County is interested in engaging in further detailed discussion surrounding the interface of the recently acquired properties at Marshall Mountain with adjacent Forest Service lands, any proposed changes that might affect management of the Rattlesnake National Recreation Area and Wilderness and recreation management objectives for recent and/or future acquired lands in the Deep Creek/Front Country Access Project area located northwest of the City of Missoula. These areas represent significant recreational assets within Missoula County that involve Forest Service jurisdiction and where we anticipate strong public interest and participation in the planning process.

Thank you for your consideration of our comments.

A handwritten signature in black ink, appearing to read 'Chet Crowser', with a long horizontal flourish extending to the right.

Sincerely,  
Chet Crowser, Chief Lands & Communities Officer

