



March 31, 2024

Lolo National Forest
Carolyn Upton
Forest Supervisor
24 Fort Missoula Rd.
Missoula, Montana 59804

Dear Forest Supervisor Upton,

Thank you for the opportunity to comment on the Proposed Action for the Revised Lolo Forest Plan. We recognize that the proposed action is a starting point from which public comment will direct the development of plan alternatives and a draft revised plan. Since much of this effort is a work in progress and major changes can occur between now and when a draft is developed, we offer these comments to help guide you in drafting alternatives and developing your revised Forest Plan.

The Montana Wildlife Federation is Montana's oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners. Many members of the Montana Wildlife Federation are users of the Lolo National Forest for hunting, fishing and wildlife viewing. The Lolo Forest provides exceptional fish and wildlife habitat and we consider it to be critically important for habitat connectivity.

What We Like

We commend the Forest in the development of this proposed action. Specifics include:

1. **Geographic Areas**. Breaking the Forest up into numerous geographically discrete subdivisions helps the public better understand the context of place based management, where specific resource management activities can be expected and the nature and extent of cumulative impacts. Having specific geographic areas also increases the opportunity to be more specific and tailor Forest Plan components such as Desired

Conditions, Standards and Guidelines, and Management Area direction to unique site specific conditions.

2. **Recommended Wilderness Areas**. We are grateful that the Forest, by and large, did not reduce the amount of Recommended Wilderness from that which was recommended in the prior Plan. We recommend that you carry all of these recommendations forward in future Alternatives. We are especially supportive of your inclusion of the Hoodoo Roadless Area as recommended Wilderness because of its importance to grizzly bear recovery. To further enhance habitat connectivity for a wide variety of wildlife species, **we would like to see an alternative(s) that recommends additional strategically located Roadless Areas for recommended Wilderness designation.**

3. **Reader's Guide**. Adding Appendix 11 to help reader's better navigate the planning documents is a welcome addition. It makes it much easier for the public to find information that is often disjointed and scattered between documents, appendices and maps in the planning files. The Reader's Guide gives the reader the chance to spend more time on substance instead of searching for information that could be located anywhere in the planning files. **We recommend that you consider expanding the Readers Guide to reference specific Geographic Areas whenever there is unique direction given for subdivisions within a Geographic Area.**

That Which Needs Improvement

1. **Ninemile Demographic Connectivity Area (DCA)**. We are disappointed that you failed to mention this area in your proposed action. The DCA was established to better enhance breeding female grizzly habitat based on consultation with the USF&W. The boundary of this area which covers the Ninemile drainage abruptly stops on the north side of I-90. **We recommend that you create an alternative that continues the DCA (or some prescription that achieves a similar result) south of I-90 and ensures grizzly bear habitat connectivity to the Hoodoo Roadless Area.**

2. Add “Connectivity” as a Specific Issue for the Lolo Forest. Although you mention connectivity as an aspect of Issue #1 (Ecosystem integrity and management), you also acknowledge: *“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.”* You add: *“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.”*

Based on the above acknowledgements plus feedback provided during a number of your public meetings, connectivity has a special relevance to the management of the Lolo National Forest. **Making connectivity an additional issue would provide the incentive for you to create and analyze alternatives that specifically address habitat linkages and connectivity.**

3. Connectivity Maps and Management. With the importance of connectivity as an issue on the Lolo Forest, **you should include a map(s) that identifies important aspects of habitat continuity at different spatial scales.** We understand that such a map is being developed at the Rocky Mountain Research Station. Once this map becomes available, we request that it be included as an Appendix Map. If this map is not available, we suggest that you use other currently available habitat connectivity maps such as the one that has been developed for grizzly bears at the Cooperative Wildlife Research Unit at the University of Montana (Sells et al. 2022).

For Forest level direction, **the connectivity map(s) should identify core areas and important corridors and/or linkage zones for large wide-ranging species such as grizzly bears.** It would be desirable to also **include finer scale connectivity maps that address the needs of species not covered by your coarse filter assessment within individual Geographic Areas on the Forest.** Recognizing that finer scale maps may not be available, **plan components should provide direction on how**

habitat connectivity will be identified and incorporated into project planning and implementation.

4. Roadless Areas. Roadless Areas contribute significantly to wildlife habitat by providing habitat security, connectivity, and rare, special and declining habitats such as old growth. As you evaluate Roadless Areas for future resource potential, **we recommend that you consider designating most or all of the existing Inventoried Roadless Areas for land use allocations that can enhance wildlife habitat and connectivity.** These allocations can range from Recommended Wilderness, to Research Natural Areas, to special designations such as the Ninemile Demographic Connectivity Area, big game winter range etc.

We specifically request that you give high priority for maintaining high fish and wildlife values by giving **special management designation for important wildlife habitat within the following Roadless Areas: (1) Hoodoo; (2) Quigg; (3) Ward Eagle; (4) Cube Iron–Silcox; (5) Reservation Divide; (6) Bear-Marshall-Scapegoat-Swan and (7) Lolo Creek.**

5. Management Areas. You identify five management areas for the Forest: *Designated Wilderness; Recommended Wilderness; Backcountry, General Forest; and Concentrated Recreation Use.* Reducing the number of management areas from the excessive number found in the prior plan is an improvement, but you have gone too far. If the public is going to be able to distinguish between differing management strategies and the management activities that will actually occur on the landscape, **additional management areas are absolutely necessary.** *Designated Wilderness, Recommended Wilderness and Backcountry* are too closely related in management intensity, yet *General Forest* appears too broad.

We suggest **dividing Backcountry into ROS Classes of Semi-Primitive Motorized** (possibly separating this into summer and winter) and **Semi-Primitive Non-Motorized.** We suggest **breaking up General Forest** into categories like **Commercial Forest, Ecological Restoration, Scenic Quality** and **Wildlife Habitat Enhancement.** These categories would limit

the number of Management Areas while giving the public a better idea what will be emphasized and what they can expect to see on the ground.

6. Plan Components (Desired Conditions, Standards and Guidelines).

Since much of the Plan revision for the Lolo remains a work in progress and the manner in which everything fits together has not been finalized, it is difficult to make specific recommendations for Plan Components. However, we recommend that plan components are developed to ensure the following: (1) species habitat recovery goals are achieved; (2) road densities and season of use accommodate the needs for wildlife security; (3) habitat connectivity direction is addressed at coarse and fine spatial scales; (4) manage vegetation to fall within the range of natural variation (RNV) at the coarse scale, but also achieve the needs of Species of Conservation Concern (SCC) and special habitats (old growth, riparian, snags etc.) at the fine scale; and (5) addresses recreation use levels and its impact on wildlife and wildlife habitat to key species such as bears, elk, goats, etc. that are sensitive to increasing recreation use from both non-motorized and motorized recreation.

Since we are specifically concerned with habitat corridors and linkages, we highly recommend the Lolo provide specific forest direction for habitat connectivity. **The Forest should add a specific forest wide guideline (FW-CON-GDL) that states something to the effect: For vegetation treatment projects within areas identified as important to habitat connectivity (core areas, corridors, linkages) the Forest will design and schedule treatments in a manner that facilitates animal movements and use** (for example limiting the area of treatments, staging timber management activities, using temporary road and/or closures, etc.).

In summary, we like much of your Proposed Action, especially the areas recommended for Wilderness, the use of Geographic Areas and the inclusion of a User's Guide. However, we believe that your proposal would benefit by: making direction for connectivity stronger and more visible; being creative in using special area designations when establishing direction for Inventoried Roadless Areas; and creating

additional management areas that can better distinguish differences in management intensity and explain the intent of expected management. In addition, we suggest that you tailor management direction (plan components) to address the unique characteristics that exists within each Geographic Area.

Thank you for the opportunity to comment on the Proposed Action for the Lolo National Forest Revised Forest Plan. We appreciate the opportunity to assist you in improving conditions for fish and wildlife and their habitat. We look forward to continuing our involvement as you move forward in your planning process.

Sincerely,



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Literature

Sells, S. N., C. M. Costello, P. M. Lukacs, L. L. Roberts, and M. A. Vinks. 2022. Grizzly Bear Habitat Selection and Predicted Movement Corridors in Western Montana. Final Report, Federal Aid in Wildlife Restoration Grant W-154-M-5. Montana Fish, Wildlife and Parks, Helena, Montana. 153 pages.