

April 1, 2024

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Re: Lolo National Forest Land Management Plan Proposed Action

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>.

Dear Forest Plan Revision Team,

Please accept my comments in response to the Forest Service's Proposed Action for the Lolo National Forest's Land and Resource Management Plan ("Forest Plan") revision. I appreciate all the work done to this point and hope you will find my comments and recommendations helpful. I also want to applaud the commitment to transparency and public outreach.

As a note, I submitted other comments on behalf of the Blackfoot Clearwater Stewardship Project steering committee and am also a Wild Montana staff member. To be clear, the following comments are my thoughts, reflections, comments, and suggestions and are **not** on behalf of any organization or entity.

About me:

I am an avid trail runner, hiker, skier (backcountry, cross country, downhill), and caver. I am an occasional backpacker, flyfisher, and wildlife watcher. I am a mediocre and very occasional mountain biker.

I have run a number of trails on the Lolo National Forest. I have run in the Bob Marshall Wilderness, hiked the State Line Trail, and backcountry skied at Lolo Pass. I deeply appreciate the solitude and sense of adventure that these experiences offer. The ability to power myself to these places and experience the wild nature informs my comments and recommendations for the Lolo Forest Plan Revision.

I have visited caves on the Scapegoat Plateau, near Foolhen Mtn and Limestone Pass on the Lolo National Forest. Protecting cave resources and the animals that depend on them for survival is important to me. I have volunteered with the Montana Natural Heritage Program across the state to monitor and test bat populations.

Finally, I have commented on other forest plan revisions across the region, and these comments reflect some of the problems and learning I have encountered in other forests. Thank you again for the opportunity to comment.

Wilderness Recommendations:

The inclusion of the 1986 Recommended Wilderness areas as a starting point has been very helpful, and I would like to see the Forest include several other key areas that are important to protect wildlife, quiet recreation, and experiences of solitude. It is also important to understand that several places have been in previous congressional Wilderness Bills. I recommend that most of those areas be carried forward in the preferred alternative of the DEIS.

I. The Great Burn

The Hoodoo Roadless area is incredibly wild and is an important habitat for sensitive species such as grizzly bears, wolverines, pikas, mountain goats, and other species. This area is refugia for these species and offers important migratory and dispersal routes for sensitive species. The Forest Service should continue to designate the Hoodoo recommended Wilderness with the same boundaries that have been in place for nearly 40 years. I also had the opportunity to visit the Ward Eagle roadless area this fall. The chance for solitude and adventure were obvious. I would like to see the Ward Eagle roadless area be managed as recommended Wilderness. Additionally, the Meadow Creek-Upper North Fork roadless areas should be managed as recommended Wilderness to protect the area's incredible wild character.

II. The Welcome Creek/Rock Creek Area

The Welcome Creek Wilderness and surrounding lands provide incredible wildlife habitat to a number of species. The Welcome Creek Wilderness was one of the first Wilderness areas I visited when I moved to Montana 23 years ago. The Wilderness character of these lands are impeccable. They also are the source of clean, cold water which is the basis for an incredible trout fishery in Rock Creek and down into the the Clark Fork. In the Proposed Action released this year, the Sliderock - Quigg Roadless Area wer recommended for Wilderness, as it was in 1986. The Stony Mountain roadless area was not recommended for Wilderness designation. I recommend that the Forest Service recommend Sliderock - Quigg Roadless area and the Stony Mountain roadless area for Wilderness designation.

The 2006 Proposed Action recommended Wilderness for both roadless areas. These recommendations should be included in the preferred alternative of the DEIS.

III. Cube Iron - Cataract Area

These three large roadless areas provide key linkage habitat for the dispersal and range of many large species. The Cube Irons are positioned between the Cabinets, Bitterroot and Mission Mountains and will be important for species survival and movement now and in the future. I would like to see the Cube Iron - Cataract and Silcox roadless areas be recommended for Wilderness in line with the Cube Iron - Cataract Coalition's proposal.

IV. Reservation Divide

In 2006 the Forest recommended the Reservation Divide for Wilderness designation, noting the natural processes that occur and the many unique features of the area. I think the Forest should work with the Confederated Tribes of the Salish and Kootenai and determine the best path forward for this area. If that is Wilderness, than I fully support that recommendation. I believe the area is worthy of Wilderness recommendation.

V. Seeley Ranger District

I support the work of the Blackfoot Clearwater collaborative and I would like to see all of the plan components of the Blackfoot Clearwater Stewardship Act reflected in the preferred alternative and ultimately in the completed Forest Plan.

The Wilderness added by the BCSA would include:

- Marshall Peak/West Fork Clearwater Recommended Wilderness Addition to the Missions Mountains Wilderness, 4,460 acres.

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- Grizzly Basin Recommended Wilderness Addition to the Bob Marshall Wilderness, 7,792 acres.
- Monture Creek Recommended Wilderness Addition to the Bob Marshall Wilderness, 40,072 acres.
- North Fork Blackfoot Recommended Wilderness Addition to the Scapegoat Wilderness, 30,967 acres.

The other non-wilderness of the components would include:

- Otatsy Recreation Management Area (winter semi-primitive motorized ROS, summer semi-primitive non-motorized ROS), 2,013 acres.
- Spread Mountain Recreation Area (semi-primitive non-motorized ROS, suitable for mechanized use), 3,835 acres.

The map detailing boundaries was provided in the comments from the Blackfoot Clearwater Stewardship project steering committee.

Wilderness Management

Only congress can designate lands as wilderness and the Forest Service makes recommendations to congress. The management of recommended Wilderness is important to the future designation of those areas as Wilderness by congress. We have seen that on other forests, the unwillingness to exclude non-conforming uses from recommended Wilderness, has allowed those uses to become entrenched by motorized and mechanized recreational groups.

Please prohibit non-conforming recreational uses in recommended Wilderness.

Primitive Recreation Opportunity Spectrum (ROS)

As defined in the Forest Service manual, Primitive ROS settings encompass “large, wild, remote, and predominantly unmodified landscapes.” These areas also contain no motorized recreation and little probability of seeing other people. Furthermore these areas provide opportunity for solitude away from roads and people, are generally free of human development, and facilitate self-reliance and discovery. Because of their wild, unconfined, and unmodified settings, primitive areas are most often associated with Wilderness or Recommended Wilderness (RW) areas, and therefore support traditional, primitive (foot and stock) recreation uses only.

It is my belief that the Primitive ROS setting should be limited to Wilderness and recommended Wilderness. If the the Primitive ROS setting is applied outside of these areas, it is incumbent upon the Forest to not find mechanized recreation as an automatically suitable use for Primitive ROS settings.

Endangered/Threatened and Sensitive Species

As the population of Montana continues to grow and habitat of species if fragmented on private land, it will be increasingly important for the Forest Service to maintain ecosystem structure and function. I look forward to seeing the analysis and forward looking plan components proposed by the forest for Grizzly Bear, Wolverine, Lynx, Mountain Goat, Bull Trout Whitebark pine and the other sensitive species.

I think it is important that the Lolo recognize that it is likely in the next year or two that there will be documented cases of White Nose Syndrome in bat species on the Forest. As of 2023 most counties with significant bat populations had recorded either *Pseudogymnoascus destructans* (Pd) positive environmental samples, Pd + bats, or Pd related mortality in bat populations. Since its arrival in North America, White Nose Syndrome has killed tens of millions of bats. In eastern states it was not uncommon to see hibernacula that were Pd + see mortality of 90-100% of the colony. Because it is likely that Pd is either already in western Montana, or soon will be, the Forest should include the species of bats that are susceptible to the pathogen as Sensitive Species.

The Fish and Wildlife Service has identified 12 species of North American bat that are susceptible to White Nose Syndrome that is caused by Pd infection.

Those 12 species are:

- Big brown bat (*Eptesicus fuscus*)
- Cave bat (*Myotis velifer*)
- Eastern small-footed bat (*Myotis leibii*)
- Fringed bat (*Myotis thysanodes*)
- Gray bat (*Myotis grisescens*) *endangered
- Indiana bat (*Myotis sodalis*) *endangered
- Little brown bat (*Myotis lucifugus*)
- Long-legged bat (*Myotis volans*)
- Northern long-eared bat (*Myotis septentrionalis*) *endangered
- Western long-eared bat (*Myotis evotis*)
- Tricolored bat (*Perimyotis subflavus*) *proposed endangered
- Yuma bat (*Myotis yumanensis*)

Not all of these species occur on the Lolo National Forest. But the species that do should be included in the list of Sensitive Species. I look forward to seeing species-specific analysis and forward-looking plan components that account for the presence or near-term arrival of *Pseudogymnoascus destructans* on the Lolo National Forest.

Cave Management

It was heartening to see that the proposed action already contained a number of provisions for cave and karst management. There are several goals, standards, and guidelines which I believe should be included to prevent degradation of cave and karst resources.

Goals:

- Forest Service works with ceremonial, scientific, education, or recreational cave users to continue to inventory, map and evaluate caves on Forest Service land.
- Encourage partnerships with cavers, researchers, and other interested parties to inventory and map caves.
- Forest Service works with partners to identify and designate significant caves as such.
- Ensure that significant caves are considered in the preparation or implementation of any land management plan

- Foster increased cooperation and exchange of information with those utilizing caves for ceremonial, scientific, education, or recreational purpose.

Standards:

- Prior to ground-disturbing activities, caves within the project area should be identified, inventoried, mapped and evaluated. Since caves are non-renewable resources, measures that will minimize or protect caves and/or their contents must be taken.
- Make accessible information on cave safety and conservation practices to interested individuals and groups. This includes existing brochures and information from the National Speleological Society, local Grottos, National Cave Rescue Commission and other groups.
- Enter into partnerships with cavers, researchers, and interested publics to identify, inventory and map caves. Inventory data collection requires an interdisciplinary effort of resource specialists. Partnerships may include but are not limited to the public education, sharing of information, cost sharing strategies and monitoring of caves and their resources.
- Cave closures (administrative or physical) should be done in partnership with local cave organizations (The Northern Rocky Mountain Grotto). Any emergency closures should be short in duration until threats can be assessed and identified. Once threats are assessed, the Forest should work with cavers to determine closure protocols.

Guidelines:

- In order to protect caves from erosion, flooding, etc. trees will not be harvested around cave entrances and important infeeder drainages, the size which will be determined by the best available science. There will be no ground disturbing activities on slopes steeper than 30 degrees adjacent to cave entrances. Tree harvest or removal outside this radius will ensure that trees are directionally felled away from the entrance.
- Tree Harvest should be prohibited around the entrances of caves with sensitive or significant populations of bats. A wide forested corridor between the entrance of these caves and the nearest foraging area should be maintained. The size of the buffer and corridor shall be determined by the best available science.
- Road construction or reconstruction shall ensure designs that do not visually open new views of a cave entrance, establish pull-outs or parking areas near a cave, or encourage increased use of an existing trail that may lead to a cave if the cave is not being managed for public access.
- Any surface activity will not divert surface drainage into a cave or its connected features (e.g. sinkhole, fissure, drainage).

Thank you

Thank you for the opportunity to provide feedback on the proposed action and for all the work that has gone into the plan revision process so far. I look forward to continuing to engage in the process. Please feel free to reach out with any questions about my comments.