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Re: Lolo National Forest Plan Revision Comments from Hellgate Hunters & Anglers

Dear Revision Team,

Please accept this comment letter on behalf of Hellgate Hunters & Anglers. HHA is an all-volunteer rod and gun club based in Missoula and we represent over 500 members in Western Montana. Our members regularly hunt, fish and recreate on public lands on the Lolo National Forest, and we have a keen interest in preserving both wildlife habitat and populations, as well as the unique recreational opportunities for solitude and recreation on the Forest. HHA is grateful for the opportunity to comment on these important revisions to the Lolo Forest Plan.

The following is a bulleted list of our recommendations based on the proposed action documents that were released on January 31, 2024, and HHA member participation in this detailed scoping process. Further elaboration is included below this list:

- Retain all currently recommended wilderness areas in Lolo National Forest.
- Establish West Fork Clearwater as a backcountry area that would prohibit motorized use but still allow mountain bikes.
- Designate the Stony Mountain Area on Rock Creek as recommended wilderness, to protect the watershed that flows into Rock Creek.
- Implement greater protections for natural resource values as western Montana sees rapid infrastructure development. More specifically, increase effort to protect fragile watersheds, wildlife habitat, and opportunities for solitude and quiet recreation.



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- Prioritize habitat connectivity to secure or establish wildlife migration corridors and intact watersheds. Capitalize on current federal funding packages (IRA and BIL) available through the USDA to achieve this work.
- Emphasize the protection of old growth forests.
- Protect bull trout and westslope cutthroat habitat and designate westslope cutthroat trout as a species of conservation concern.
- Support guidelines to eliminate or minimize disturbance of big game habitat, particularly winter range.
- Prohibit the use of domestic sheep and goats for vegetative grazing within all proximity to bighorn sheep.
- Maintain the uniqueness of the Rattlesnake Recreation Area by establishing a separate Management Area just for the RNRA that keeps the standards from the 1986 Plan.

Old Growth, pg. 21

HHA appreciates that the Lolo NF recognizes the unique characteristics of old growth on the Forest, and that the Lolo NF supports the conservation and expansion of old growth conditions on the forest. Old growth forests provide wildlife habitat, species diversity and numerous other important ecological processes. We support Desired Conditions (FW-OG-DC) 04.

Conservation Watershed Network and At-Risk Fish and Aquatic Species, pgs. 40, 47

The Conservation Watershed Networks are some of the most important lands on the Forest. They are current and future fisheries strongholds that will remain highly functional in future climate change scenarios. These populations will be anchors that will help us protect and recover other fish populations in the future. It is essential that these areas are maintained and restored to natural conditions.

HHA believes the FS should amend Standard (FW-CWN-STD) 01 to include at-risk fish and aquatic species (including westslope cutthroat trout). This standard could be amended to read “[m]anagement activities in the CWN shall be designed and implemented in a manner that supports the recovery of federally listed species and at-risk fish and aquatic species and



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supports the achievement of desired conditions and does not degrade them when evaluated at the HUC12 subwatershed scale. Short-term site-specific adverse effects from project activities may occur when they support the long-term recovery of aquatic and riparian desired conditions and federally listed species and at-risk fish and aquatic species.”

Important streams identified for bull trout and other native fish species should continue to be protected and monitored closely. We appreciate the prioritization of watersheds and the goals to improve and restore them. HHA further believes that westslope cutthroat trout should be identified as a species of conservation concern and consequently, added to the Forest’s list of at-risk fish species. While there are numerous populations of cutthroat trout throughout the waterways of the Forest, these populations are fragmented and lack connectivity due to a variety of factors, including habitat destruction, lack of adequate passage, stream degradation and chronic dewatering. These factors will be exacerbated by climate change, which will lead to altered flow regimes, warming stream temperatures and other negative impacts.

Species Diversity, p. 41

Big game habitat needs to be conserved and protected. With limited winter ground in the area, it is important to protect big game food sources and security as well as monitor and combat the invasive and noxious weed problem. Roads open to motorized use can contribute to the spread of weeds and often fragment big game habitat as wildlife actively avoid road disturbance. Roadless areas should be carefully considered in order to ensure wildlife habitat remains intact. Migration corridors are also incredibly important to wildlife and should be protected. We strongly support the proposed guidelines which dictate that:

- Management activities should not occur on identified critical winter range or parturition areas during seasonal windows when big game populations are concentrated in these areas.
- New motorized or mechanized routes:
 - Should be designed and managed to not displace big game from identified critical winter range or parturition areas.”
 - Should not be developed in identified critical winter range or parturition areas.



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We support mountain goats being added to the species of concern list. Their population numbers have steadily decreased over time and they should be given greater protections and should be monitored. Winter activities can disturb mountain goats during their most vulnerable time and this should be given careful thought when planning recreation, such as snowmobile access. In addition, we generally support the guidelines for protection of mountain goats and bighorn sheep outlined on p. 46.

Sustainable Recreation and Scenery, p. 57:

As the population of Western Montana continues to grow and recreational use steadily increases on the Forest, it is critically important to balance recreational uses with impacts to wildlife habitat. HHA does not support increased mechanized and/or motorized use in wildlands that currently prohibit -mechanized and -motorized use. HHA is concerned that technological advancements of traditional motorized and electric vehicles will infiltrate users further and further into unroaded and untrammed wildlands. Increased mechanized use would adversely impact both the wildlife, wildland characteristics and create safety concerns. The USFS should continue to manage e-bikes as motorized vehicles and prohibit them from being used on trails open to mechanized use but closed to motorized use. HHA would also prefer to see resources put into maintaining existing trails, for example, rather than creating new ones.

HHA generally supports the Guidelines and Objectives outlined in the PA but would request the following additions:

Goal: Backcountry areas are to be managed to keep their primitive and uncrowded character. Management activities should protect solitude and quiet recreation in backcountry areas of the Lolo NF.

Objective: Within backcountry areas, user-convenience developments should be avoided. Maintaining solitude and wild characteristics will be priority considerations before any new developments in backcountry areas are permitted.



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Wild & Scenic Rivers, Appendix 7, p. 35 and 62

We support the eligible streams and rivers for the National Wild and Scenic Rivers system. The streams eligible for Wild and Scenic designation provide exceptional fishing and recreation opportunities. It is increasingly important to protect these waterways not only for their important wildlife habitat but also to help mitigate effects of climate change. These streams also provide spawning areas for native fish populations. Protecting streams with historically cooler waters is very important for the overall health of the ecosystem. As water temperatures continue to climb in the summer months and water levels drop, further protections are greatly needed to ensure fish and other aquatic species are not negatively impacted.

Hunting, Trapping, Fishing, and Wildlife Viewing, p. 71

HHA supports the Desired Conditions and Goals outlined in the PA, but would support the addition of a new Desired Condition that specifies that: “there are vast and undeveloped backcountry and recommended, and designated Wilderness areas where hunters and anglers can pursue their passions in a primitive setting where self-sufficiency and self-reliance can be learned.”

Recommended Wilderness, p. 155.

HHA agrees with retaining the recommended wilderness areas of the Great Burn, Bob Marshall Wilderness Addition, Sliderock, and Selway-Bitterroot Addition. These areas provide quality wildlife habitat as well as unique hunting and fishing opportunities. HHA would support expanding the 3,702-acre Selway Bitterroot Addition to run right up to and around the expanded Carlton Ridge Research Natural Area. This area provides contiguous wildlife connectivity between the Bitterroot National Forest and other important landscapes to the north.

The Rattlesnake National Recreation Area should have its own management area due to its unique attributes and its heavy recreation use. The area provides more primitive recreation opportunities such as hunting, fishing and hiking that we value. Its large undeveloped landscape is worth protecting and preserving. We do not agree with opening up portions of the area to



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more relaxed management strategies where an increase in motorized use, new roads and commercial logging are included. Rattlesnake Creek supports a stable bull trout population. Sections of these roads are connected to the streams and chronically deliver sediment to the streams. Allowing motorized recreation would increase sediment production along the road and sediment delivery to the streams. HHA does not support opening up the Rattlesnake area to livestock grazing as livestock can negatively impact wildlife habitat. The Rattlesnake Area should be managed for primitive recreation as it is now in order to preserve its character.

Thank you again for considering our comments and for the excellent public engagement efforts in this significant forest plan update.

Sincerely,

Andrew Gorder
Board President
Hellgate Hunters & Anglers