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Lolo National Forest Supervisor's Office  
Attn: Lolo Plan Revision Team  
24 Fort Missoula Road Missoula, MT 59804

Subject: Lolo Forest Plan Revision - Proposed Action Scoping

Dear Lolo Plan Revision Team,

Thank you for the opportunity to comment on scoping for the proposed action for the Lolo National Forest (LNF) Land Management Plan revision. Montana Fish, Wildlife & Parks (FWP) has entered into an MOU with the USFS as a "cooperating agency" in the spirit of USFS' "all-lands" approach to land management planning. FWP appreciates the opportunity for several of our teams to meet regularly and provide ongoing input through the process with the shared goals of improving communication, coordination, and efficiency. Specific responsibilities of the USFS, as detailed under NEPA, are "to consider relevant land management plans and policies of other agencies" and to "better integrate decision making within [our] respective jurisdictions." With these guidelines in mind, we offer the following comments on the draft proposed action.

FWP commends the Lolo National Forest in putting together a draft proposed action that includes many important provisions that will continue to provide needed management direction in a complex and changing environment.

#### GENERAL SUPPORT

- FWP appreciates the Lolo NF is including bighorn sheep, mountain goats, fisher, Idaho giant salamanders, western pearlshell mussel, and harlequin ducks as species of conservation concern and we support special management considerations for these species.
- In general, FWP supports the LNF's focus on restoring natural processes (i.e., natural and mimicked disturbance regimes) that create a mosaic of forest species compositions and structural classes on the landscape. FWP also appreciates the specific focus on returning forested areas and other habitat types back to the historical range of conditions, such as old-growth forests, that were in place prior to widespread historical logging, overgrazing, and fire suppression. Under this vision, wildlife on the LNF should thrive and find the resources they need.
- FWP agrees with the assertion made by the LNF that fire is an integral part of the ecology of forested areas on the LNF, and commitments made in the Plan to work with "adjacent communities, landowners, permittees and state, local, and other federal agencies to promote a collective understanding that wildland fire is an ecological process." This education component is critical to reverse 100 years of messaging (much of it by the USFS) about wildfire being inherently detrimental

to forests. We encourage the LNF to set the national standard for this type of outreach and prioritize these plan elements.

- FWP recognizes the value and utility of LNF's goal "to work with willing landowners and other entities to acquire, or manage under conservation easements, non-federal lands within the NFS boundary to promote habitat structure, function and connectivity."

#### GENERAL COMMENTS

- FWP appreciates the effort that went into developing a reader's guide and appendix aimed at easing the navigation of this document. However, the appendix page numbers and sections did not align with the plan document and we recommend further developing this section to help readers navigate the plan. We also recommend consideration for a dedicated section on wildlife to help orient and direct the reader to the pertinent wildlife content.
- FWP appreciates the thoroughness in the Geographic Area Direction section for the Clearwater Upper Blackfoot and would like to see the same amount of attention and detail for the other GA's in this section. For example, there is a goal acknowledging the coordination and support Lolo National Forest will provide for management objectives in the Blackfoot-Clearwater Wildlife Management Area (WMA) and the Marshall Creek WMA under the Wildlife Plan Component but there is no mention of the Fish Creek WMA in the MCF/NPC areas. In particular, we think it is important to recognize the importance of coordinated cross-boundary management to maintaining wildlife connectivity in these areas.
- Throughout the proposed Plan, the LNF provides a comprehensive vision for managing the LNF and its resources. The proposed Plan outlines dozens of USFS goals, guidelines, and actions that are relevant to controlling use of the Forest by humans to avoid damage to critical infrastructure and fish and wildlife habitats. However, we did not see any mention of commitments to enforcement supporting these goals, guidelines, and actions. We suggest the LNF include a section of the proposed Plan on enforcement, whereby they commit to fully staffing law enforcement officers at a level needed to adequately patrol the LNF. Of particular concern to FWP, and where we have observed rampant past and ongoing violations, are in backcountry winter recreation, pioneered campsites in RMZs, and trespass on roads closed to motor vehicles. Without a commitment to enforcement, either as its own section or incorporated into all relevant sections, the potential to achieve Desired Conditions, Goals, Objectives, and Guidelines in the proposed Plan will be compromised.

#### CONSERVATION WATERSHED NETWORKS

- FWP supports the concept of Conservation Watershed Networks (CWN). However, specific priorities, designations, and rationale should be updated with accurate and current information regarding the status of native trout and mussel species (e.g., related to Appendix 1). This information is vital to the plan and will be provided to USFS staff via ongoing meetings with FWP fisheries and aquatic staff.

#### SPECIES OF CONSERVATION CONCERN

- Western pearlshell mussels are a Species of Conservation Concern and the Lolo National Forest supports some of the best remaining populations in Montana. FWP has developed numerous

recommendations and comments regarding specific management practices and actions that will help protect and enhance this species. These comments/suggestions will be provided via ongoing meetings with USFS fisheries and aquatic staff.

- For bighorn sheep, FWP advocates for any management direction on the Forest to be compatible with our Montana Bighorn Sheep Conservation Strategy (2010). This should include effective disease risk management wherever human use represents a health threat to bighorns.

#### ELK

- FWP is concerned to not see any management direction related to elk security on the Forest during hunting season. The new Montana Statewide Elk Management Plan (2023) includes a strategy to “work with public land managers to maintain or improve elk security” on all hunting districts on the Lolo. Security areas for elk have been the focus of decades of collaboration between the USFS and FWP, including on the Lolo National Forest and more generally (e.g., USFS and FWP 2013). Therefore, it is imperative to see a clear commitment on the part of the Lolo to maintain functional elk security. Whereas elk security is primarily a function of roads and cover (with cover not being a limiting factor on the Lolo), proper road management is critical to meeting this need.
- The Montana Statewide Elk Management Plan (2023) includes strategies to benefit both elk populations and distributions by working with land management agencies to improve forage conditions and overall habitat conditions on both summer and winter range. While forage conditions are important in all seasons, forage quality and quantity during the late summer and early fall have a disproportionate effect on elk population growth and therefore deserve specific attention. Goals, objectives, or strategies to improve elk forage in late summer or early fall could be built into wildlife or timber components of the plan. The same approach of specifically detailing and focusing on elk forage needs during summer and winter would be a benefit to other big game, like mule deer.

#### BEAVERS

- FWP appreciates the recognition of the beaver-induced disturbance regime as a critical component of aquatic and terrestrial habitats in the LNF, particularly in relatively unconstrained alluvial valleys. We further appreciate the specific management directions aimed at reconnecting streams to their floodplains and encouraging beaver expansion into areas of their former range. We encourage the LNF to incorporate elements of the Montana Beaver Action Plan where relevant and consider how its actions related to beaver management and beaver restoration can be supportive of the goals, objectives, and actions outlined in the Beaver Action Plan.
- While FWP is appreciative of the LNF specifically mentioning beavers in various portions of the proposed Plan, we feel the Plan could be improved in several areas given the outsized importance of beavers to ecosystem health and ecosystem services. We recommend that beavers and beaver-modified systems be called out specifically in the LNF Plan as a critical component of aquatic and terrestrial ecosystems. Beavers are one of the most impactful species on the entire LNF and deserve serious consideration and incorporation into all relevant areas of the proposed Plan.
- We recommend the LNF commit to using non-lethal options to deal with beaver conflict issues as the first step before moving on to beaver removal or relocation. When and where infrastructure is needed in areas modeled to be suitable for beaver damming activity, we think the LNF should consider committing to right-sizing culverts, bridge spans, headgates, and other man-made pinch-

points to prevent creating a human-beaver conflict situation. Where such pinch-points cannot be avoided, the LNF should consider committing to installing non-lethal beaver conflict deterrents (e.g., culvert fences, pond levelers, tree fencing) as a proactive measure for minimizing potential conflicts with beavers.

## CONNECTIVITY

- FWP believes the Plan can be improved in addressing terrestrial connectivity for wide-ranging wildlife species. As written, the Plan has a heavy focus on connectivity for aquatic systems but little complementary components for terrestrial connectivity, including for riparian areas. Actions the LNF could take to improve terrestrial connectivity could include undertaking floodplain restoration to bolster movement corridors along valley bottoms or re-routing roads/trails that interrupt important terrestrial movement corridors along ridgelines, through open-understory forest types, and leading up to and through expanses of public land that span or nearly span valley bottoms adjacent to the LNF. We suggest special consideration be given for management actions that occur around powerlines and closed roads that are disproportionately used by wide-ranging wildlife species as travel corridors.

## RECREATION AND WILDLIFE

- FWP does not clearly understand how the recreation opportunity spectrum will be managed in sensitive wildlife areas, seasonally or otherwise. In these areas, we would like to ensure the LNF has safeguards in place to manage all types of recreation (motorized, mechanized, and non-mechanized) in such a way to limit impacts on wildlife. For example, we see language specific to limiting motorized/mechanized recreation in winter range and parturition areas for big game, and in designated bighorn sheep or mountain goat ranges. However, we do not see any similar language related to non-motorized/mechanized recreation, including site-focused activities like rock climbing or paragliding.
- FWP recommends that new infrastructure that concentrates recreation should not be developed near stream channels, riparian areas, or floodplains. This is in acknowledgement of these habitats providing critical resources to most wildlife species at some point in their life cycle and providing the highest densities of breeding nongame wildlife of any habitat on the LNF, including both terrestrial and aquatic species. We encourage the LNF to be especially careful where old-growth conditions and recreation overlap, which is especially relevant to floodplains and riparian areas as much of the remaining old growth occurs in these areas and they are highly sought after for recreational uses and amenities.
- FWP encourages the plan to refer to the goals laid out in the Statewide Comprehensive Outdoor Recreation Plan (SCORP) - <https://leg.mt.gov/content/Committees/Interim/2019-2020/EQC/Meetings/Jan-2020/scorp-2020-2024.pdf>. This plan is a significant undertaking that can and should assist agencies in setting priorities for recreation development, management, and capacity.
- Similarly, FWP requests that the plan be reflective of collaborative efforts where land managers strive to work across jurisdictional boundaries to arrive at a community vision for recreation and stewardship that leads to sustainable and effective recreation management.
- The plan should also acknowledge that communities across the Lolo National Forest rely on outdoor recreation as a significant part of the community identity and economy

[\(https://headwaterseconomics.org/economic-development/trends-performance/outdoor-recreation-economy-by-state/\)](https://headwaterseconomics.org/economic-development/trends-performance/outdoor-recreation-economy-by-state/). Outdoor recreation should be managed with the same professionalism and attention as other plan components so that recreation is managed in such a manner to provide equitable access; diverse and appropriate opportunities; and a sustainable model of stewardship to protect natural and cultural resources at the landscape level.

- The benefits of outdoor recreation on both mental and physical health are well documented (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8498096/>). As the population of Montana changes, we can expect changes in the types, amounts, and frequencies of use at recreation sites. The plan should allow for adaptability as these changes occur so that land managers can be both proactive and reactive to changing uses and conditions.

#### RIPARIAN AND WETLAND HABITATS

- FWP recommends the LNF strive for full-floodplain management and restoration of natural processes along stream corridors and wetlands within the LNF. More emphasis should be placed on valley bottoms and floodplains, along with stream channels and riparian areas, as part of comprehensive lotic systems. Management direction should seek to expand and maintain river-wetland function in valley bottoms to benefit both terrestrial and aquatic species. For instance, emphasis on both inner and outer RMZs to benefit all terrestrial and aquatic species inhabiting riparian corridors, not just benefits along immediate stream channels.
- The proposed Plan appears heavily focused on the concept of a single, easily defined stream channel and associated aquatic environment. While this condition (i.e., single-thread channel) is the natural condition for many streams across the Forest, the emphasis on the stream channel as a defining feature for delineating RMZs and other management directions reflects a long history of streams existing in a simplified state that is not reflective of their historical condition. In broad valley bottoms, this single-thread channel state is usually due to long-term degradation from widespread removal of beavers, overgrazing, and fire suppression. We think RMZs would be better defined by the potential active floodplain under pre-European conditions as delineated by bank slopes and soil types and not by the location of the current “active channel”. This can be accomplished collaboratively as systems are actively reviewed by resource staff.
- FWP suggests landscape-scale water storage be specifically mentioned, and supportive actions implemented to maintain or enhance this ecosystem service (e.g., floodplain restoration, beaver restoration, slope wetlands and peatland protection/restoration, and forest management for historical conditions and abundant CWD). This aspect has wide-ranging benefits to priority resources on the Forest, including sensitive fish and wildlife species, aquatic and riparian habitats, as well as downstream services provided by water delivery.
- FWP supports the emphasis on restoration of streams and aquatic habitat in several sections of the Plan. Selection, prioritization, and implementation of these projects should be accomplished collaboratively with natural resource management agencies (including FWP) that have overlapping management authority to ensure consistency and evaluation of all project aspects. Removal/upgrade of stream crossing structures (e.g., FW-CON-OBJ-02), and stream/floodplain restoration should be reviewed in consultation with state agency partners. Project selection should consider species composition, genetic integrity of native species, and overall fisheries management goals for watersheds.

## SNAGS

- While we appreciate the attempt by the LNF to incorporate specific guidelines around snags, we feel the plan could be improved in this regard. Snags are one of the most important components of a healthy forest, yet the size, density, and distribution of snags has been dramatically altered over the past century as forests have fallen outside of the historic range of conditions. A large proportion of Montana's Species of Greatest Conservation Need that live in forested areas are dependent on snags. If not within the LNF's pursuit of historic range of conditions, we recommend the LNF seek to achieve higher snag densities overall with a specific focus on retaining large-diameter snags (i.e., greater than approximately 20" DBH). Large-diameter snags are rare on the landscape as a result of historic fire suppression and subsequent changes in forest structure at the National Forest scale. Furthermore, redundancy in snags is critical to account for needed variation in snag height, decay class, longevity, and to account for territorial spacing among snag-dependent species. We recommend the LNF develop specific guidelines as to which snags on the landscape are most desirable to retain, considering size, species, location on the landscape, and decay stage.
- FWP recommends the LNF place more emphasis on protections for, and propagation of, exceptionally large trees (greater than approximately 28" DBH). Exceptionally large trees are incredibly rare in modern forests but provide resources for a disproportionately large number of species relative to the trees' abundance on the landscape. We suggest developing a specific set of guidelines for exceptionally large trees that focuses on maintaining them on the landscape at densities and distributions more reflective of historical conditions.
- We recommend the Plan include Desired Conditions and Objectives for burned areas relative to snag retention densities and abundance, not just size. We recommend snag densities be much higher in recently burned areas than in non-burned areas to provide for burned-forest dependent species and to help mitigate excessive sediment runoff on post-fire landscapes.

## WILDFIRE AND FUEL TREATMENTS

- "Fire refugia" seems to be lumped into the same category as "fire resilient" forests, lacking distinction between areas that do not burn at all during wildfires (e.g., active floodplains, beaver colonies, fens, etc.), and areas that receive, and indeed may be dependent on, low-intensity or understory burns. We recommend the LNF better distinguish between these two aspects of forest condition, and provide relevant identification and definitions of these conditions, as well as targeted management strategies for each.
- FWP would like to see a clear goal for the Lolo NF to work with the state and other partners as needed when designing fuels reduction projects to identify areas and resources of value for fuel treatments.

## GRAZING

- While FWP appreciates that grazing has its own section, we don't think that grazing is adequately incorporated throughout the rest of the document as a potential impact to habitats and recreational experiences. We suggest the LNF consider grazing impacts on USFS allotments at each portion of the proposed Plan, especially in relation to impacts to streams, wetlands, riparian areas, and floodplains, as well as interactions with large predators.

- FWP recommends that where fences are used to contain livestock these should be consistently maintained and regularly checked to assure adequate containment. We see objectives related to restoring degraded conditions from grazing but no complementary objectives to address the source of the degradation. Riparian areas and wetlands are sensitive habitat types that may require fencing to exclude cattle except at strategically placed watering gaps. The Plan should consider mitigations for any other identified livestock impacts in other habitats (other than just riparian areas and fish).

#### WESTLOPE CUTTHROAT TROUT

- Westslope cutthroat trout (WCT) are an important native fish, a key indicator species, and Montana's state fish. Protection and enhancement of WCT should be an important aspect within many Plan components. FWP is revising its WCT Conservation Strategy and will use it to inform future comments and recommendations.

#### WATER QUALITY

- Appendix 4 references 319 and TMDL processes related to EPA water quality standards. Water quality and stream habitat impairments are recognized on 303(d) listed streams within the Lolo National Forest boundary. Lists of 303(d) impaired streams and types of impairments for drainages within the Plan area are incomplete and should only be used as one reference for water quality impairments. 'Restoration Plans' associated with TMDLs are typically being prepared by non-agency staff, often without review and limited data and input from natural resource managers. Therefore, prioritization and recommended actions based on this information should be viewed cautiously.

Thank you for considering our comments. Additionally, FWP appreciates the opportunity we've had so far to provide additional details and information through the subgroup and coordination meetings. While preparing this comment, we also compiled a detailed list of suggested inputs to the language of the document that we will submit through the subgroup meetings. We look forward to continuing to work together toward building the final plan. We encourage you to reach out to Stevie Burton, [Stevie.Burton@mt.gov](mailto:Stevie.Burton@mt.gov) or (406) 594-7354, as the primary contact person with any questions or concerns about these comments.

Sincerely,



Kendra McKlosky  
Regional Supervisor (Acting)

### Literature Cited

Montana Bighorn Sheep Conservation Strategy. 2010. Montana Fish, Wildlife & Parks, 1420 East Sixth Avenue, Helena, MT 59620. 313 pp.

Montana State Wildlife Action Plan. 2015. Montana Fish, Wildlife & Parks, 1420 East Sixth Avenue, Helena, MT 59620. 441 pp.

Montana Statewide Elk Management Plan. 2023. Montana Fish, Wildlife & Parks, 1420 East Sixth Avenue, Helena, MT 59620. 471 pp.

U.S. Forest Service and Montana Department of Fish Wildlife and Parks. 2013. Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests.