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

Re: Lolo NF Land Management Plan Revision – Proposed Action

Dear Amanda,

Thank you for the opportunity to comment on the *Proposed Action Lolo National Forest Land Management Plan*. We include by reference the comments submitted by Adam Rissien on behalf of WildEarth Guardians, the Flathead-Lolo-Bitterroot Citizen Task Force, Friends of the Bitterroot, Friends of the Clearwater, Western Watersheds Project and Wilderness Watch.

In all directions, the public lands of the Lolo National Forest surround us. The view from my window in Missoula stretches unobstructed from Lolo Peak to Cha-paa-qn. We have hiked, skied, backpacked, or camped in all geographic areas of the Lolo. We have swum, canoed, floated, and rafted its rivers, and soaked in the sounds and peace of its waters. And have watched in awe as a grizzly sow and her cubs swam across the Blackfoot as we rested on its shore. I have the memory of a fall hike to Cliff Lake with my old dog, on what would be her last long walk in the woods.

The Lolo is our home and we take responsibility for it. We give our time and experience to comment on many forest projects and several land management plans on the Lolo and surrounding national forests. We have participated in countless meetings and ranger chats and written comments for this Lolo plan revision process when called upon. We are stakeholders though not always treated as such. We don't necessarily wear hats of a recognized group; mountain bike, snowmobile, OHV, horseback, hunter angler, or trappers club; or stake interest in a particular space on the land; or make a living in the woods product, ranching, mining, outfitter guide or other commodity or recreation-based industry. But we have standing without the hat.

Unlike many who belong to specific interest groups, we understand national forest management transcends our personal uses. It's not about us. We speak for the wildlife and habitat and other values without a voice. We recognize the Lolo holds some of the most ecologically significant public lands in the region. It is the hub that connects the public lands and ecosystems essential to threatened and endangered species, Canada lynx, wolverine, grizzly bear, and the still imperiled wolf. The cold waters that flow from headwater streams is critical to dwindling populations of bull trout and westslope cutthroat trout.

During meetings and written comments, in the interest of wildlife we requested all Inventoried Roadless Areas (IRA) be recommended wilderness, and supported the Northern Rockies Ecosystem Protection Act (NREPA). We requested IRAs be managed to maintain wilderness character and non-motorized recreation year-round. We urged the Lolo to prioritize threatened wildlife and connectivity for grizzly bear and other wide-roaming species faced with climate change. Unfortunately, with little exception we do not see our initial requests at the collaborative table or in written comments reflected in the proposed action. In addition, there are several elements of the proposed plan that fail to meet provisions of the 2012-planning rule. Finally, the proposed action put forth lacks a consistent structure useful to provide clear and meaningful direction for such a critical and what is likely to be a very long-standing forest plan.

## Concerns with the Preliminary Need for Change

### The PNC Potential for Bias

Before getting into details, we are forced to point out a potential for bias. In **Section 2.2.3 Social and Economic Sustainability and Multiple Uses**, language in the Preliminary Need to Change (PNC) states the, “2012 planning rule emphasizes the contribution to social and economic sustainability to provide people and communities with a range of social, cultural, and economic benefits. Plans will guide management of National Forest System lands so that they have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future (36 CFR 219.1(c)).”

The choice to highlight this statement under PNC section 2.2.3 (pg. 6) skews and cherry picks verbiage in 219.1(c), which states in full, “The purpose of this part is to guide the collaborative and science-based development, amendment, and revision of land management plans that *promote the ecological integrity* of national forests and grasslands and other administrative units of the NFS. Plans will guide management of NFS lands so that they *are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity* to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future. These benefits include clean air and water; habitat for fish, wildlife, and plant communities; and opportunities for recreational, spiritual, educational, and cultural benefits.” [emphasis added]

While 36 CFR 219.1 (c) does include the “*capacity* to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits...”, a careful reading shows *ecological integrity and sustainability are actually emphasized*. The bias in PNC 2.2.3 has skewed the structure and integrity of this document and the Proposed Action (PA) throughout. [emphasis added]. The 2012 planning rule is structured to present Sustainability (219.8) and Diversity of Plant and Animal Communities (219.9) first. In fact, Section 219.10 multiple use ‘states, “*While meeting requirements of S. 219.8 and 2.19.9, the plan must provide for ecosystem services and multiple use.*” I read that as 219.8 “(a) *Ecological sustainability. (1) Ecosystem Integrity.* The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account...” a detailed range of ecological and physiographic parameters. § 219.8 also provides for “(b) *Social and economic sustainability.* The plan must include plan components, *including standards or guidelines*, to guide the plan area’s contribution to social and economic sustainability, taking into account...”, with a range of social and economic parameters. § 219.9 Diversity of plant and animal communities reiterates, (a) *Ecosystem plan components. (1) Ecosystem integrity.* As required by § 219.8(a), the plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity.

Nowhere can it be interpreted that the 2012-planning rule ‘*emphasizes*’ the contribution to social and economic sustainability *over* that of ecosystem sustainability as the cherry-picked language in PNC 2.2.3 implies. To correct this bias, provide the complete content of 219.1 (c) and place it above section 2.2.2. I urge you to restructure the content of the PA to make it consistent with the structure of the 2012-planning rule. This will give the public a more complete context of plan and help employees to better implement it.

### PNC 1.2: Previous Plan Revision (2006) under the 2005 Planning Rule

I can add something to the history of the 2006 Lolo Proposed Plan, having worked on Western Montana Planning Zone Forest Plan Revision Team (WMPZ) initiated in 2003. The WMPZ FPR team put out a streamlined Analysis of the Management Situation per the 1982 planning rule dated January 23, 2004. In addition, a concise 24-page PA document framed the major needs for change and proposed action was

released in the Federal Register on January 20, 2004, for a 90-day comment period. From what I remember the WMPZ did a comprehensive review under a content analysis process coordinated with a dedicated Enterprise Team. In early 2005 the decision was made to change course from the 1982 to the 2005 rule, which we used to develop three Proposed Plans, one for each of the national forests. These were released for public comment on April 6 2006. We completed content analysis for the “2006 proposed plans in fall 2006 and published and posted reports on the WMPZ website. Based on public scoping, the WMPZ team was in the process of finalizing the three land management plans in the spring of 2007 when a court ruling based on a national lawsuit pulled the 2005-planning rule and all plans developed under the 2005 rule.

The Lolo PNC states, “This previous effort provides some insight in the analysis of the management situation (2003) and lists the major themes: Access, integrated ecosystem management, forest products, recreation and outfitter guide management, wilderness recommendations and roadless areas, and wildland-urban interface management.” It states the issues raised provided a foundation for the current need for change. And that “Relevant information from need for change, public comment and issues, and tribal input identified as part of the 2003-2006 planning effort is incorporated throughout this document”. Note a one-page document titled, “Relationship of the 2006 Draft Plan Revision to the Upcoming Revision for the Lolo National Forest” was handed out to participants at public meetings beginning in January 2023 and posted on the Lolo plan revision website. Despite this ‘commitment’, *foundations* provided in the 2006 plan are ignored. There is ongoing interest in the 2006 plan and it has raised by numerous people and organizations in public meetings. **I request that the 2006 Lolo Proposed Plan be included as an alternative and analyzed in full in the DEIS’. Include a discussion of how the proposed action compares with the 2006 proposed plan for each evaluating criteria and the rational for any decisions.** The 2006 proposed plan was a significant investment by the American taxpayer, done by a knowledgeable and dedicated team and with full public participation. It deserves to be seriously considered and included in the appendix or linked to the PA.

#### PNC 2: Concerns with Consistency with Planning Rule Requirements

The introduction to this section points to a major shift from the 1982 rule from an output to outcome focus; based on integrated resource management; and ecological, economic and social sustainability. I do not disagree that “An “all lands” approach places forest management in the context of the broader landscape. However, I couldn’t find ‘all lands’ approach referenced in the 2012 planning rule. The closest found was, § 219.2 Levels of planning and responsible officials 3) The supervisor of the national forest, grassland, prairie, or other comparable administrative unit is the responsible official for development and approval of a plan, plan amendment, or plan revision for lands under the responsibility of the supervisor, unless a regional forester; the Chief;.....or the Secretary acts as the responsible official. Two or more responsible officials may undertake joint planning over lands under their respective jurisdictions.”. Under § 219.4 (a) Requirements for public participation, (1) Outreach provides for engaging the public and encouraging individuals, youth, private landowners adjacent to forest lands, and (iv) state, counties and local governments, .... etc. and (v) Tribes to seek cooperating agency status. Other provisions for federally recognized Tribes include government-to-government relationships in sections (2) and (3). § 219.4 (b) provides for coordinating with equivalent and related planning efforts of other entities.

However, §219.4 (b)(3) specifies “Nothing in this section should be read to indicate that the responsible official will seek to direct or control management of lands outside of the plan area, nor will the responsible official conform management to meet non-Forest Service objectives or policies.” I question blurring management of federal lands with other entities such the state of Montana under Good Neighbor Authority. ‘Public lands in public hands’ is a popular sentiment that politicians claim to support. I’m not certain the public understands the distinction between protecting public land boundaries but allowing resource management, in some instances with financial gains to entities other than the U.S treasury. The DEIS and revised plan should disclose and analyze effects of this and/or similar practices.

The PNC highlights, “Revised plans are rooted in the distinctive roles and contributions of each national forest and emphasize an adaptive management approach using the best available scientific information.” It is

important to get this foundational element correct per my request above. Connectivity is central to an all-lands approach. This is discussed in more detail below.

### PNC 2.1: New Information and Science

Despite the PNC accurately citing § 219.3 Role of science in planning, the literature cited in the Proposed Action appears gravely inadequate. This is unfortunate since the Revised Assessment appears to have plenty of literature citations, though the rationale for selecting these compared to other studies is not always documented. By contrast the PA cites only 12 references, nine of which are related to Tribal or cultural and historic roles and contributions, all published prior to 2000. One a 1993 master's thesis is on whitebark pine as a food source for hunter's and gathers, even though whitebark pine is now listed as a threatened and endangered species. Only three of these were published since 2006; one a 2019 paper on the Salish people and the Lewis and Clark Expedition, and one the U.S. Department of Agriculture, Forest Service. 2022. *Confronting the wildfire crisis: A strategy for protecting communities and improving resilience in America's forests*; Washington, D.C. U. S. Department of Agriculture, Forest Service. 25 p.; the FS topic de jour.

One exception to the dearth of science in the PA can be found in Appendix 3: Proposed and Possible Actions and Potential Management Approaches. At first glance it appears to have a good representation of current science, including two 2022 papers on restoration of whitebark pine, now listed as a threatened and endangered plant species under the endangered species act. However, the rationale documenting these references is not consistent. I'll defer to comments submitted by WildEarth Guardians and others to address the expectations and examples of best available science and the role of the responsible official to document what and how the best available science was used to inform the planning process and the basis for determination.

### PNC 2.2 Required Plan Content

This section states the revised plan must fulfill all requirements of the 2012 planning rule.

#### **PNC 2.2.1 Resource Integration and Strategic Planning**

This contains several needs for change that are inconsistent with requirements of the 2012 planning rule.

The first is PNC (pg. 5) second bullet that states “a need to shift from output-based to outcome-based planning, such as using desired conditions and objectives and placing less emphasis on prescriptive standards.” Goals and objectives are strategic, and desired conditions aspirational. Standards and guideline components along with suitability provide boundaries to effects on ecological integrity and sustainability. These are most easy to monitor and in a timely enough manner to make adjustments useful for adaptive management. It is a mistake to elevate the ‘strategic’ components at the expense of standards and guidelines that provide accountability. An absence of measurable standards and prescriptive guidelines could drive management to an arbitrary condition-based management paradigm that is not part of the 2012-planning rule.

Not only does this conflict with the 2012 planning rule, it conflicts with section PNC 2.3 Required Plan Components in this very document, “Standards are *mandatory constraints* on project and activity decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet legal requirements.” (pg. 9) [emphasis added].

The 2012-planning rule clearly requires plan components, including standards and guidelines. An assessment of the *Forest Service's 2012 Planning Rule and its Implementation*<sup>1</sup> by Federal Advisory Committee Members (FACA) states, “plan components are at the heart of a forest plan, and the 2012 Rule requires that “every project and activity must be consistent with the applicable plan components” (36 CFR §219.15[b]). Components are to be integrated, written clearly, concisely, and without ambiguity, and *include desired conditions, objectives, standards, guidelines, goals, and suitability-of-land determinations*. Taken together,

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<sup>1</sup> The Forest Service's 2012 Planning Rule and its Implementation: Federal Advisory Committee Member Perspectives, J. For. 117(1):65–71 doi:10.1093/jofore/fvy055 Copyright © 2018 Society of American Foresters.

plan components establish the vision of a plan, set forth the strategy to achieve it, and *provide the constraints of subsequent management.*” [emphasis added] The need for change to place less emphasis on more prescriptive components does not provide constraints on subsequent management and deviates from the 2012-planning rule.

The 2012-planning rule establishes requirements that extend beyond a predetermined scheme to diminish the relevance of the more prescriptive required plan components. According to § 219.7 (c) (2) “In developing a proposed new plan or proposed plan revision, the responsible official *shall*: (i) *Review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content.* [emphasis added]. (ii) Consider the goals and objectives of the Forest Service strategic plan (§ 219.2(a)). (iii) Identify the presence and consider the importance of various physical, biological, social, cultural, and historic resources on the plan area (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11. (iv) Consider conditions, trends, and stressors (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11.”

The USDA strategic plan<sup>2</sup> (U.S. Department of Agriculture Strategic Plan, Fiscal Years 2022–2026) referenced, not only has relatively little application to the forest service but is prone to change every few years. More than a couple of bullet points under PNC 2.2.1 on page 5 is needed to make such a radical departure from the required components in the planning rule.

The third bullet, “need to update tactical, prescriptive language with strategic language, identifying land suitability, desired conditions, and objectives, and project design guidelines and standards” attempts to set boundaries but a number of the resource sections in the PA stop at objectives and fail to provide standards and guidelines, making it difficult to monitor with any measurable accountability. A review of LNF PA Appendix 11, Table A11.1—Reader’s guide to plan components by topic shows many lack standards though some have guidelines such as; forest wide species diversity (FW-SDIV), general species at risk, plant species at risk, and fish and aquatic species at risk; and aviation. Motorized use has no standards except in MA 1, Wilderness. Forestwide forest vegetation (FW-VEGF), largely related to MA 4 general forest has detailed desired conditions but only one goal, one objective, and three guidelines. There are no standards or limits on suitability.

PNC (pg. 5) fourth bullet, states a “need to reconsider the management area scheme in the 1986 plan”. The PA does more than reconsider, it applied these concepts in the proposed action to go as far as to provide only five management areas. This is not prescriptive enough and compounds the lack of accountability in the scheme to deemphasize more prescriptive plan components. This is discussed more fully under the section pertaining to the Proposed Action.

**The LNF specifically documented that “management areas, geographic areas, and suitability in the 2006 plan WILL provide a launching point for land allocation development.” Again, develop and analyze an alternative around the 2006 proposed plan for the Lolo.**

### PNC 3: Reflect New Law, Policy, Regulation, and Direction

Near the top of this section is the framework that supports the Lolo National Forest’s contributions to implementing the Wildfire Crisis Strategy. We appreciate identifying Executive Order 14072 for Old Growth signed in April 2022, followed by an inventory of mature and old growth forests in April of 2023, and pending forest service wide rulemaking as of December 2023. We also appreciate consistency with the 2001 Roadless Rule, and status of federally listed species. Missing is President Biden’s Executive Order 14008, Tackling the Climate crisis at Home and Abroad<sup>3</sup>. We are particularly interested in Section 216, in which he sets a goal of “conserving at least 30 percent of our lands and waters by 2030. The goals of E.O 14008

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<sup>2</sup> <https://www.usda.gov/sites/default/files/documents/usda-fy-2022-2026-strategic-plan.pdf>

<sup>3</sup> Biden, Joseph R., Jr. January 27, 2021. [Executive Order 14008: Tackling the Climate Crisis at Home and Abroad.](#) *Federal Register* 86:19 (February 1, 2021), 7619–7633.

are consistent providing for ecological integrity including connectivity §219.8, for biodiversity §219.9, and with § 219.10 Multiple Use (b) (iv) Protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.

#### PNC 4: Address Gaps in Current Direction

In general, the LNF has identified a good list of information gaps in PNC 4.2.1: ecosystem integrity. These include: to provide management direction that addresses the importance of habitat connectivity, landscape patch and pattern, and wildlife-linkage zones between landscapes; to consider the concepts of fire refugia and climate refugia and how the ecological role of these areas can be supported by the plan; and to provide a sustainable conservation and management strategy for old growth and other late-successional forests which incorporate considerations such as wildlife habitat, carbon sequestration, and forest and landscape resilience to disturbances. Hopefully, these will be embedded in LNF plan components and secured by accountability of prescriptive components, actualized on the landscape.

We are concerned however, with (4.2.1 bullet 15) “To establish management direction for aquatic and riparian ecosystems that meets the intent of INFISH and PACFISH and contributes to improvement of aquatic habitat and eventual delisting of fish species under the Endangered Species Act”. This is not carried forth in the proposed action thus does not provide adequate provisions to safeguard aquatic habitat leading to delisting of endangered species. Riparian management zone standards are limited to: “riparian width based on stream category; Vegetation management treatments, including the removal of dead or dying trees, shall only occur in the inner RMZ to restore or enhance aquatic and riparian-associated resources; and project activities within outer RMZs shall be specifically designed to ensure the ecosystem functions of the inner and outer RMZ are protected (managed within reference conditions)”. Reference conditions are not clear in the standards, guidelines or included in the monitoring plan.

The PA fails to adequately bridge the gap created by dropping INFISH in other resource areas such as in the conservation watershed network that “contains streams currently used by bull trout for spawning or rearing habitat, streams with the most abundant, genetically intact westslope cutthroat trout populations, and streams that provide habitat for aquatic species of conservation concern (including those that serve as a connectivity corridor to the major river systems, those that are currently unoccupied by these species but which are currently providing cold water to them, and those where cold water source is expected to remain cold into the future even with predicted effects of climate change)” Here *Standards (FW-CWN-STD)* are limited to: “01 Management activities in the CWN shall be designed and implemented in a manner that supports the recovery of federally listed species and 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.” Consider beaver as an ecosystem engineer for riparian recovery.

The Flathead National Forest had a similar need for change. I am herein paraphrasing the Sierra Club comment I helped author to the FNF proposed action and including by reference comments of Friends of the Wild Swan related to bull trout, aquatic ecosystems, and native fish habitat. We did not support the FNF PA’s need for change to replace the Inland Native Fish Strategy (INFISH) with new management standards and guidelines then, and for most of the same reasons do not support the Lolo NF’s need for change because:

1. The proposed plan components are not equivalent to the protections afforded aquatic habitat and species under the current plan as amended by INFISH. For example, the Proposed Action:
  - Eliminates Riparian Management Objectives (RMOs) for key indicators of native fish habitat such as water temperature, large woody debris, bank stability, width/depth ratio and pool frequency that were in INFISH and does not provide a rationale for why RMO objectives, standards and guidelines were removed.

- Does not retain a riparian Management Area allocation or designate a riparian protection zone around streams, rivers, lakes, ponds and wetlands. A guideline (FW-GDL-RCHA -01) referring to default Riparian Habitat Conservation Area (RHCA) widths in the ‘glossary’ is not equivalent to INFISH standards.
  - Lacks or has fewer and weaker standards and guidelines for timber, roads, grazing, recreation, minerals, fire/fuels, lands, and general riparian management and for watershed/ habitat and fisheries/wildlife restoration.
2. The PA disregards the large body of science regarding the impacts of roads on aquatic ecosystems and contains one guideline: “Project specific BMPs should be incorporated into road maintenance activities as principle mechanisms for protecting water resources.” This is not equivalent to INFISH as the FNF claims on page 10 of the Proposed Action. The PA does not contain road density standards and other measures to protect native fish and water quality from known road effects:
- Roads contribute more sediment to streams than any other land management activity.
  - Poorly planned, designed, located, constructed or maintained roads can degrade fish habitat.
  - Roads directly affect natural sediment and hydrologic regimes by altering streamflow, sediment loading, sediment transport and deposition, channel morphology, channel stability, substrate composition, stream temperatures, water quality, and riparian conditions within a watershed. These habitat alterations can adversely affect all life stages of fish, including migration, spawning, incubation, and emergence and rearing.
  - Concentration of surface and sub-surface water, inadequate maintenance, undersized culverts, and sidecast materials can lead to road-related mass movements.
  - Road/stream crossings can be a major source of sediment to streams resulting from channel fill around culverts and subsequent road crossing failures.
  - The 1998 USFWS Biological Opinion for bull trout<sup>4</sup> stated: “there is no positive contribution from roads to physical or biological characteristics of watersheds. Under present conditions, roads represent one of the most pervasive impacts of management activity to native aquatic communities and listed fish species.”
  - Roads in close proximity to streams (< 30 meters or 98 feet) are considered a primary factor resulting in reduced habitat conditions for bull trout<sup>5</sup>. This study indicated that roads near streams could have the same effect on a stream reach as large changes in climate, geomorphology, and management.
  - The Forests in western Montana support 81 percent (or 1,462 miles) of the designated spawning and rearing habitat for bull trout. Given this high percentage, and the potential negative effects of roads on streams, the management of the road system is a principal concern for bull trout.<sup>6</sup>
  - Roads closed with a recontour intersection or rock/earth barrier (closure level III) design criteria requires all stream crossing structures be removed at the time of closure or the mitigation actions for level II roads apply.
3. There is no indication from the PA that the revised Forest Plan will facilitate bull trout recovery. As noted above the PA removes Riparian Management Objectives, allows unmaintained roads to remain with culverts, doesn’t comply with USFWS Biological Opinions, eliminates INFISH standards and guidelines, removes the riparian management allocation and overall allows the Flathead more discretion and less accountability. The Forest Service’s actions must lead to recovery of threatened and endangered species – not just survival.

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<sup>4</sup> 1998 USFWS Biological Opinion for bull trout

<sup>5</sup> (Meredith et al (2014)

<sup>6</sup> (Biological Opinion of the Effects to Bull Trout and Bull Trout Critical Habitat from Road Management Activities on National Forest System and Bureau of Land Management Lands in Western Montana, 2015)

- Bull trout are protected under the Endangered Species Act and critical habitat has been designated on the Flathead. The Flathead can tailor standards and guidelines to habitat features using the best available science from local studies. But it cannot eliminate the INFISH RMOs, standards and guidelines and not replace them with something at least comparable if not stronger.
- Does not honor additional commitments required by the US Fish and Wildlife Service in its June 19, 1998 consultation<sup>7</sup>.

It's been five years since the Flathead implemented its forest plan revision in 2018. Hopefully they have monitoring results that could adequately demonstrate the efficacy of dropping INFISH. Please apply Flathead monitoring results based on bull trout and native fish populations, and stream habitat parameters used as surrogates to INFISH, as an opportunity for an adaptive management course correction if needed before dropping INFISH and replacing by the close to nothing in the Lolo proposed action.

## **General Comments on the Lolo National Forest Plan Revision Proposed Action**

### Document content, structure and ease of navigation

On page 1, the Lolo PA states among the purpose of the land management plan is, “(3) to address the preliminary identified need for change to the existing land management plan.” It then addresses the PNC as an “additional document”. Despite a 20+ page preliminary need for change, the Lolo proposed action offers no synthesis of need for change themes in its proposed action. This is a departure from both the Flathead (an adopter forest) and Custer-Gallatin national forests proposed actions. The C-G offered a simple two paragraph description with a short list of categories. The Flathead PA went the extra mile. Despite the fact that the FNF preliminary need for change was a succinct 9 pages, in its proposed action it provided the public with a six-page synthesis of the major elements that drive the need for change: the 2012-planning rule, grizzly bear habitat management, bull trout and native fish habitat, Canada lynx habitat management, Old Growth Forests, and winter motorized recreation. It included a summary of Inventoried Roadless Areas and the Roadless Area Conservation Rule.

“Inventoried roadless areas (IRAs) are designated under the Roadless Area Conservation Rule (36 CFR 294 Subpart B). The Roadless Area Conservation Rule (RACR) prohibits road construction or reconstruction and cutting, selling or removing timber in IRA’s unless a listed exemption applies. For example, one exemption allows the cutting, sale or removal of generally small diameter timber when it is needed to improve threatened, endangered, proposed or sensitive species habitat or to maintain or restore the characteristics of ecosystem composition and structure that would be expected to occur under natural disturbance regimes. The forest plan cannot modify RACR direction. The RACR can only be changed by congressional action or a new USDA rulemaking.

Currently on the Forest, there are 478,754 acres of IRAs, which is about 20 percent of the Flathead NF (refer to figure C-3). The need for changing the management direction in the IRA’s from the 1986 forest plan is to remove IRA’s from the suitable timber base, and determine the recreation opportunity spectrum classification, the type of travel management desired, and the desired management area delineation. The majority of the IRA’s on the Flathead NF are being proposed for backcountry (58 percent) and recommended wilderness (34 percent) management areas.”

By contrast, the Lolo NF provides a separate 21-page document of the preliminary need for change. The 65 maps in the PA are in Appendix 1, with six maps per GA. There is no vicinity map or GA management area maps in the PA document. As a result, the proposed action is cumbersome to navigate without privilege of GIS overlay maps by both the public and forest employees needing to implement the plan.

### Distinctive Roles and Contributions

PA Section 1.5 Additional Plan Content: Distinctive roles and contributions

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<sup>7</sup> 1998 USFWS Biological Opinion for bull trout



Distinctive roles and contributions are a required section of a forest plan. “The 2012 planning rule (36 CFR 219.7(1(ii)) and associated handbook (FSH 1909.12.22.32) require that revised plans describe the plan area’s distinctive roles and contributions within the broader landscape. This content describes roles for which the plan area is best suited, considering the Agency’s mission, *the unit’s unique capabilities, and the resources and management of other lands in the vicinity.*” [emphasis added]. This is cited in § 219.2 (b)(1), not 219.7.

FSH 1909.12.22.32 emphasizes the importance of properly identifying distinctive roles and contributions, “Once described, the plan area’s roles and contributions within the broader landscape can serve as a focused foundation or context that should be a unifying concept helping to define the vision for the plan area within the broader landscape. This description is important because it is a source of motivation or reasons behind desired conditions (emphasizes added)....

“The description of the plan area’s distinctive roles and contribution within the broader landscape must not be a list of all the roles of the plan area. Rather, it should reflect those things that are truly unique and distinctive (emphasis added).” In the proposed action, the Lolo rewrote and expanded on this section compared to the assessment. However, it reads more as a history and background than distinctive roles and contributions, but fails to reflect what is truly unique and distinctive of the Lolo: its capacity for connectivity due to its location and position on the broader landscape.

Notwithstanding deference to tribal knowledge placed at the top of this section, we were surprised forestwide ecological and old growth roles and contributions placed at the bottom of this section. This was pointed out and corrected between the draft and revised Assessment (September 2023). It is inconsistent with the structure of 2012-planning rule. The proposed actions for the Flathead and Custer-Gallatin national forests managed to get this right in laying out ecological resources first, social and economic resources second, and cultural and historic resources third. Please correct this arrangement to be consistent in the final plan.

In earlier comments, I requested the LNF identify connectivity as the LNF’s most distinctive role and contribution. Since the proposed plan does not include an adequate description, please use that of the Lolo-Bitterroot Partnership Citizen Plan<sup>8</sup>, and modify for geographic applicability.

#### “Crossroads of the Northern Rockies Ecosystem

The Lolo and Bitterroot National Forests are located in the heart of the Northern Rocky Mountains, the largest assemblage of native wildlife and wildlands in the lower 48 states. Four million acres of wild America are home to a unique array of rare and endangered wildlife including the grizzly bear, wolf, lynx and wolverine. Migratory bull trout and cutthroat trout still roam the waters. Elk herds and moose seek refuge on these lands while bighorn sheep and mountain goats scale the craggy peaks and native birds fly the skies. Predator-prey relationships continue as they have for millennia. Yet more than 1.2 million acres of Wilderness-quality lands remain unprotected and vulnerable to damage from road building, logging, mining and excessive mechanized and motorized recreation. These special wildlands include the Rock Creek drainage, Great Burn, Ninemile, the southern Swan Range, Monture Creek, Blodgett Canyon, Sapphire and Blue Joint Wilderness Study Areas. A major defining feature is the Bitterroot Mountain Range, whose crest defines the western boundaries of the Lolo and Bitterroot National Forests.

The Lolo-Bitterroot region is ‘**Connectivity Central**’ for wildlife. The Lolo National Forest has lands in three different Grizzly Bear Recovery Areas and is critically located between the Northern Continental Divide, Greater Bitterroot and Cabinet-Yaak Ecosystems. The western half of the Bitterroot National Forest is part of the vast central Idaho wildlands complex which is the largest assemblage of wildlands in the lower 48. It connects this ecosystem to the rest of the Northern Rockies through the Sapphire and Pintler Mountain Ranges including a key linkage for grizzly bears to and from the Greater Yellowstone Ecosystem.

The Lolo and Bitterroot National Forests, along with the Flathead National Forest were previously considered as the Western Montana Planning Zone (US Forest Service 2004). A Forest Plan Revision for the Lolo National Forest (2006) was never completed and since that time the Flathead National Forest has

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<sup>8</sup> Lolo Bitterroot Partnership: A Citizen Plan for Fish, Wildlife and Forests. June 2022.  
<https://montanaforestplan.org/images/citizen-forest-plan/Lolo-Bitterroot-Partnership-Plan.pdf>

revised its Forest Plan. The Lolo and Bitterroot National Forests are a unique ecological entity and deserve to be considered together as part of a larger Northern Rockies landscape. This is the proper scale of analysis for identifying broader environmental trends including regional connectivity for wildlife and climate change.”

### Connectivity

Despite its prominent distinctive role and contribution, connectivity is poorly covered in the proposed action. We understand this topic is being more fully developed or modeled through sources outside of the planning team. Two thoughts on this: for one the proposed action is premature until this important element is more fully covered. And second existing models could be incorporated. As an example, the Flathead-Lolo-Bitterroot Citizen Task Force and Friends of the Bitterroot submitted, *The Lolo Bitterroot Partnership: A Citizen Plan for Fish, Wildlife and Forests* (June, 2022)<sup>9</sup>. It has been endorsed by numerous organizations, scientists and businesses and received over 10,000 signatures from the public. **Geographically applicable parts of the Citizen Plan must be considered and analyzed in full as an alternative in the DEIS with connectivity as one of the evaluating criteria.** An emphasis on connectivity is an imperative, not an option.

“The long-term survival of grizzly bears (*Ursus arctos*) in the northern Rockies is dependent on connecting isolated populations with areas of protected habitats between the designated Grizzly Bear Recovery Areas (Allendorf et al. 2019) and linking the populations into a metapopulation would significantly reduce extinction risk (Boyce et al. 2001; Servheen et al. 2001; Craighead and Vyse 1996). Originally referred to as biological corridors, in 1990 the U.S. 9<sup>th</sup> Circuit Court of Appeals in *Marble Mountain Audubon v. Rice*. (U.S. 9<sup>th</sup> Circuit Court of Appeals. D.C. No. CV-89-1701-EJG) recognized the legal requirement to protect these areas, describing them as “...avenues along which wide-ranging animals can travel, plants can propagate, genetic interchange can occur, populations can move in response to environmental changes and natural disasters, and threatened species can be replenished from other areas.” (Id at 4).

Connectivity is a component of the National Forest Planning Rule of 2012 and a Demographic Connectivity Area was designated in the Ninemile area of the Lolo National Forest as part of the NCDE Grizzly Bear Conservation Strategy in 2018. As grizzly bears reoccupy native habitat in the Northern Rockies there is a need to designate additional Demographic Connectivity and Restoration Areas as part of National Forest management plan revisions or amendments.

The LBP Citizen Plan refers to the Lolo-Bitterroot region as ‘**Connectivity Central**’. It is critically located between the three Grizzly Bear Recovery areas. The PA describes the Conservation Watershed Network (CWN) on the LNF as containing streams currently used by bull trout for spawning or rearing habitat, streams with the most abundant, genetically intact westslope cutthroat trout populations, and that provide habitat for aquatic species of conservation concern (including those that serve as a connectivity corridor to the major river systems, those that are currently unoccupied by these species but which are currently providing cold water to them, and those where cold water source is expected to remain cold into the future even with predicted effects of climate change). Given its resource of cold-water habitat in western Montana, the CWN in the LNF is particularly important for the recovery of bull trout.

Consider including a management area specific for connectivity as mapped corridors and/or linkage habitat. With the LBP Citizen Plan as a core, other existing areas included in research reports, maps, and models could be incorporated. Consider a Conservation Connectivity Network, similar to the Conservation Watershed Network. A paper titled Forty-Four Conservation Recipes for 30x30<sup>10</sup> listed steps the forest service could take to reach the Biden’s E.O.14008. These include protect the following: Inventoried Roadless

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<sup>9</sup> Lolo Bitterroot Partnership: A Citizen Plan for Fish, Wildlife and Forests. June 2022.

<https://montanaforestplan.org/images/citizen-forest-plan/Lolo-Bitterroot-Partnership-Plan.pdf>

<sup>10</sup> Kerr, Andy. Forty-Four Conservation Recipes for 30x30: A Cookbook of 22 Administrative and 22 Legislative Opportunities for Government Action to Protect 30 Percent of US Lands by 2030. February 2022. Andy Kerr (andykerr@andykerr.net, 503.701.6298 v/t), The Larch Company (www.andykerr.net), Ashland, OR, and Washington, DC.

Areas Against Mining and Close Loopholes; Forest Service Large Roadless Areas; Forest Service Small Roadless Areas; Elevate the Conservation Status of Forest Service Special Areas; Increase Acreage in Forest Service Special Areas; and Protect ESA Critical Habitat as Forest Service Special Areas. All these areas could be included in a connectivity plan, if not actually in a management area dedicated to connectivity. An emphasis on connectivity is NOT an option; it's an imperative. In 2023 the Whitehouse issued Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors.<sup>11</sup> Recognize the importance and significantly improve the section and carry in all components.

### Inventoried Roadless Areas and Recommended Wilderness

Protections inherent in designated Wilderness and recommended wilderness are cornerstones to connectivity. Inventoried Roadless Areas and other designated areas that offer protections are stepping stones to connectivity.

#### **Inventoried Roadless Areas**

The intro to the proposed action for IRA's (p. 84-85) states, "The 2001 Roadless Area Conservation Rule (Roadless Rule)<sup>12</sup> established prohibitions and permissions on road construction, road reconstruction, and timber harvesting. . . . . The intent of the Roadless Rule is to provide lasting protection for inventoried roadless areas in the NFS in the context of multiple-use management. The Roadless Rule prohibits activities that have the greatest likelihood of altering and fragmenting landscapes, including the elimination of permanent road construction and reconstruction. Plan components in this section are designed to support and augment the Roadless Rule.

"All the inventoried roadless areas in the LNF are included in MA 3, Backcountry, in the proposed action. The plan direction for this MA applies to these areas as described in chapter 4. Maps of inventoried roadless areas are found in appendix 1. Inventoried roadless areas constitute approximately a third of the lands administered by the LNF (Table 17)".

The plan components provided for IRA's are inadequate. For example, one of only two desired conditions is, "Roadless areas provide recreational opportunities for *motorized* and non-motorized users consistent with desired recreation opportunity spectrum classes of primitive, semi-primitive non-motorized, and semi-primitive motorized settings." IRAs are embedded in MA3, to maintain the integrity of IRA's and transparency with the 2001 Roadless Rule, please differentiate MA3 as motorized and non-motorized.

The **Purpose and Need for the Roadless Area Conservation Rule** (Id at 3244) states, "The Department of Agriculture is responsible for managing National Forest System resources to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. . . . In the future, expanding urban areas and increased fragmentation of private lands make it likely that the largest and most extensive tracts of undeveloped land will be those in public ownership.

"This final rule prohibits road construction, reconstruction, and timber harvest in inventoried roadless areas because they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics. Although other activities may also compromise roadless area values, they resist analysis at the national level and are best reviewed through local land management planning. Additionally, the size of the existing forest road system and attendant budget constraints prevent the agency from managing its road system to the safety and environmental standards to which it was built. Finally, national concern over roadless area management continues to generate controversy, including costly and time-consuming appeals and litigation (FEIS Vol. 1, 1– 16 to 1–17). This final rule addresses these needs in the context of a national rulemaking."

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<sup>11</sup> <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>

<sup>12</sup> Federal Register 2001 roadless rule: <https://www.govinfo.gov/content/pkg/FR-2001-01-12/pdf/01-726.pdf>

**Subpart B—Protection of Inventoried Roadless Areas § 294.10 Purpose.** The purpose of this subpart is to provide, within the context of multiple use management, lasting protection for inventoried roadless areas within the National Forest System.

In the interest of transparency, include more specific direction provided in the 2001 as plan components under Forestwide Inventoried Roadless Areas (FW-IRA). Also, post the 2001 Roadless Rule background document on the Lolo Forest Plan Revision website.

**“§ 294.13 Prohibition on timber cutting, sale, or removal in inventoried roadless areas.** (a) Timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section.

(b) Notwithstanding the prohibition in paragraph (a) of this section, timber may be cut, sold, or removed in inventoried roadless areas if the Responsible Official determines that one of the following circumstances exists. ***The cutting, sale, or removal of timber in these areas is expected to be infrequent.*** (1) The cutting, sale, or removal of ***generally small diameter*** timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in § 294.11. (i) To improve threatened, endangered, proposed, or sensitive species habitat; or (ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period; (2) The cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited by this subpart; (3) The cutting, sale, or removal of timber is needed and appropriate for personal or administrative use, as provided for in 36 CFR part 223; or (4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. ***Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area and prior to January 12, 2001.*** Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area.” [emphasis added].

In regards to time restrictions for when roads and timber could have been substantially altered by management activity, please see the section below titled, **Past and pending forest projects are eroding potential for wilderness character**, which I submitted during the wilderness evaluation phase. While a responsible official can approve projects, the roadless rule addresses the cumulative effects, “If management decisions for these areas were made on a case-by-case basis at a forest or regional level, inventoried roadless areas and their ecological characteristics and social values could be incrementally reduced through road construction and certain forms of timber harvest. Added together, the nation-wide results of these reductions could be a substantial loss of quality and quantity of roadless area values and characteristics over time.” (Id at 3246). Include this incremental loss of roadless areas on connectivity, wildlife habitat and the roadless area values and characteristics in the roadless rule. (Id. 3245).

### **Recommended Wilderness**

The 1986 plan recommended 223,600 acres in four area with high wilderness values including: Great Burn (89,530 ac), Bob Marshall Addition (69,250 acres), Selway Bitterroot addition (3990 but dropped 10,670 ac), and Sliderock-Quigg (60,830 ac). The 2006 proposed plan recommended over 283,000 acres in five geographic areas. The proposed action recommends 223,914 acres, 60,000 fewer acres than were recommended wilderness in the 2006 proposed plan. These include:

- 11,100 acres in 2006 proposed plan as compared to 7,204 ac in the proposed action for the Selway Bitterroot Addition in the Lolo Creek GA.
- 77,124 acres in 2006 compared to 86,893 acres in the proposed action in the Middle Clark Fork GA. The 1986 plan recommended 89,530 acres in the Great Burn Hoodoo.
- 15,407 acres in 2006 as compared to 0 acres in the proposed plan in the Ninemile Petty Cr GA.
- 98,606 acres in 2006 as compared to 58,826 acres in the proposed action.
- 81,057 acres in 2006 as compared to 70,995 in the Clearwater Upper Blackfoot GA.

The unit of measure for WSR in the PA is miles rather than acres so it is unclear if it is included in the surrounding recommended or wilderness acres. In the 2006 plan the unit of measure is acres that are in addition to recommended wilderness. Both the 1986 and 2006 offer more protections than the PA.

The LNF Revised Assessment Section 3.9: Designated Areas does a good job describing the history of prior efforts to protect inventoried roadless areas. The 1986 ROD discussed strong support for Cube-Iron Wilcox (37,700 ac) and while this was not recommended, the area was recognized for 21,000 ac for essential grizzly bear habitat but cited high recreation use by local community as a non-qualifying need. “Management emphasis on grizzly habitat, other wildlife needs, visual quality, and roadless recreation in a non-wilderness setting, will provide the best opportunities to manage the vegetation and continue to provide for the grizzly bear and other values.”. What has monitoring shown in providing for these values? Stony Mountain was also not recommended in 1986. But it was recommended in the 2006 Lolo proposed plan. Please carry this forward in the DEIS and final plan.

Note: In May 2023, I submitted comments on the wilderness inventory and suitability assessment for the Lolo National Forest Forest Plan Revision (FPR). Since I do not see my comments adequately reflected in the proposed action, I’m resubmitting my comments here in their entirety.

“The intent of the inventory is to identify lands that may be suitable for inclusion in the National Wilderness Preservation System. The inventory is the first of four phases. It is intended to be reasonably *broad and inclusive*. Evaluation and recommendation for wilderness occurs in later phases.

Direction in FSH 1909.12 Chapter 70 is based on the 2012 planning rule, in which wilderness values are more inclusive than under the 1982 rule. Section 71 guides criteria to identify and create an inventory of all lands that may be suitable for inclusion in the NWPS. At this early phase, direction is to create an inventory that is ‘broad and inclusive’. For instance, the presence of roads do not eliminate an area from the inventory, but are included or excluded based on FS road maintenance level, status in prior decision documents, whether decommissioned, or are not regularly maintained, etc. Other improvements including vegetative treatments do not disqualify an area from the inventory, if these are considered substantially unnoticeable.

I support the Lolo-Bitterroot Partnership: A Citizen Plan for Fish, Wildlife, and Forests authored by the Flathead-Lolo-Bitterroot Citizen Task Force and the Friends of the Bitterroot. This document has been presented to Carolyn Upton, Lolo National Forest supervisor. The appendix on pages 21-22 includes 38 areas by name for proposed wilderness on the Lolo. I am including this document by reference.

I also support the Northern Rockies Ecosystem Protection Act (S. 1276, 117th Congress) and urge all areas on the Lolo National Forest that are identified in this document to be included in the inventory. The purpose of this act is to prioritize wildlands recovery to help restore biological diversity and native species and to establish a system of biologically connected corridors between core ecosystems in the Northern Rockies Bioregion and ecologically significant wild land to the south, and to protect the ecological integrity and contiguity of major wildlands ecosystems and interconnecting corridors identified, among other purposes. I have provided previously provided relevant sections of this document and including by reference.

### **Inventory Process**

The inventory process considers existing, relevant information identified during the assessment phase (FSH 1909.12, Ch. 70), including information about designated areas (such as inventoried roadless areas), transportation infrastructure (such as road maintenance levels), and past or pending wilderness recommendation proposals. The Lolo National Forest Wilderness Process paper specified previously proposed wilderness areas from the 1986 Lolo National Forest Land Management Plan will be included in the evaluation to ensure consistent documentation of wilderness characteristics as required by the 2012 Planning Rule. Please carry these areas forward in full.

I trust the team relied on use of management area designations in the existing plan in developing the inventory but it is not clear in the process paper how MAs 11 and 12 were integrated into the inventory. Maintaining the ecological integrity of these areas is critical to a wilderness inventory and evaluation. These also represent the best opportunity to recognize species composition and wildlife habitat that may be under-represented in other parts of the forest.

MA 11 consists of large, roadless blocks of land distinguished by their natural environmental character. They are located throughout the Forest in a variety of terrain and vegetative habitat types. Portions of this Management Area on the Seeley Lake and Thompson Falls Ranger Districts are included in the Forest Service designated essential grizzly bear habitat. This Management Area represents approximately 13 percent of essential habitat on the Forest unroaded blocks. MA 12 consists of the portions of the Forest that have been classified as wilderness or are proposed for wilderness classification.

Lolo Forest Plan Amendment 7 addresses MA 11 and MA 12 specifically. On the Seeley Lake RD the Bob Marshall Wilderness Addition - MA 11 becomes MA 12. Proposed Wilderness boundary change to conform with Lolo National Forest Plan, Record of Decision, page 11 *under Response to Issues, Concerns, and Opportunities*. I want to make sure the boundary and area of MA 12 on the Seeley Lake RD in Monture accurately reflects this change.

### **30X30 direction**

In Executive Order 14008, Sec. 216. Conserving Our Nation's Lands and Waters, President Biden directed agency secretaries, Council on Environmental Quality, and the heads of relevant agencies, to recommend steps the United States should take to achieve the goal of conserving at least 30 percent of our lands and waters by 2030. Currently only 13 percent (13x21) of US lands have adequate conservation protection to meet this goal (US Geological Survey GAP 1 or GAP 2 status). To achieve 30 percent by 2030, another 17 percent, or ~490 million acres, must attain GAP 1 or GAP 2 status. Wilderness is the only designation that meets GAP 1 requirements. It is the gold standard. For broader issues of climate change and loss of biodiversity it is imperative all remaining wildlands are recommended. Recommend accountability all lands in the inventory and evaluation that could potentially meet GAP 1 or GAP 2 criteria.

### **Determinations of substantially noticeable do not support a reasonably broad and inclusive inventory**

Determinations of substantially noticeable in Appendix B of the process paper is an arbitrary value. Use of the forest activity tracking system and the time since treatment are not necessarily supported by on the ground conditions. Excluding areas based on these determinations fails to result in an inventory that is reasonably broad and inclusive. Variability on the landscape can influence recovery from disturbance: aspect, slope shape, steepness, elevation, soil type and depth, etc., influence vegetation. While a five-year-old pre-commercial treatment is going to be somewhat visible, it would be less so by the end of the four plus year span of this revision. More intensive treatments may but are not necessarily substantially noticeable following the 40-year timeframe shown in Table 14. A clearcut could resemble a high intensity wildfire, a natural process, especially since the 1986 forest plan had visual quality objectives for vegetative treatments, which if observed would have minimized edge effects and linear features.

As a result, determinations in Appendix B exclude too much area from the inventory of lands that may be suitable and it prematurely determines these will not be evaluated for wilderness characteristics. As a result of Appendix B determinations, the inventory fails to be broad and inclusive, especially given the absence of a more complete assessment early in the process. Areas excluded based on visual appearance should be assessed for consistency in meeting visual quality objectives of the 1986 Lolo Forest Plan. The inventory should note where treatments failed to meet existing objectives and include these as provisional areas with intent to ReWild or restore by mitigating the damage. In any case a

complete assessment should have been done prior to this exercise and must be done prior to excluding any otherwise suitable lands from the inventory.

### **Past and pending forest projects are eroding potential for wilderness character**

There have been a number of recent or pending fuel treatment projects across the forest in response to the so-called wildfire ‘crisis’. We don’t have a complete list but as of 1/7/2020, amendment 46 amended the forest plan for “Swamp Eddy EA/DN: This amendment changes the Management Area designation for two parcels of land totaling approximately 527 acres that were incorrectly mapped during the development of the 1986 Lolo Forest Plan. These parcels are located near Combest Peak on the Plains/Thompson Falls Ranger District. Approximately 481 acres in the Miller Creek drainage is changed from Management Area 27 (land where timber management is not economically or environmentally feasible due to physical features of the parcels) to Management Area 25 (land with a medium degree of visual sensitivity and is available for varying degrees of timber management), which is the current allocation of adjacent lands. Approximately 46 acres in the East Fork Swamp Creek drainage is changed from Management Area 27 (land where timber management is not economically or environmentally feasible due to physical features of the parcels) to Management Area 16 (timber management), which the current allocation of adjacent lands.

Decisions for several projects on the Lolo including Sawmill-Petty on the Ninemile Ranger District have similarly amended the existing forest plan in ways that have or could affect the substantially noticeable determination and/or the wilderness character of the lands. Sawmill-Petty alone would amend 7,076 acres to change Management Area (MA) 27 (land where timber management was not economically or environmentally feasible due to physical features, so these have remained largely untouched) to MA 16 (lands of varying physical environments as determined by soil, slope, aspect, elevation, physiographic site, and climatic factors suitable for timber management), MA 17 (slopes generally over 60 percent and best managed from an economic criteria with a low road density), MA18 (managed to attain a balance of cover and forage for big game through regulated timber harvest), MA 23 (timbered lands on south-facing slopes, with medium visual sensitivity, with developed road systems), and MA 25 (lands with a medium degree of sensitivity, which are available for timber management), or other designations.

In the DEIS, assess all project or forest-wide amendments that have decreased potential wilderness character and determined that these do not qualify for recommended wilderness based on prior management. Add to these amendments the trend toward shared stewardship management with potential conflicting values and missions of the forest service such as with Montana state and other entities. This includes paying federal dollars to the MT DNRC to perform project NEPA. Programs such as Good Neighbor Authority with state, county, and other entities under 2014 and 2018 Farm Bills could unnecessarily exclude otherwise suitable areas from the inventory. In the assessment, please address the impact of authorities under shared stewardship on ecological integrity important to wilderness character.

### **Connectivity and Climate Change**

Designated areas including Research Natural Areas, Inventoried Roadless Areas, Botanical Areas, Wilderness Areas are core to connectivity. All such designations should be carried forward in the Inventory. Climate change will likely affect physical and biological processes and attributes within wilderness and compromise the degree to which affected areas function as a refuge and amplify the need for some species to migrate. I urge the Lolo NF to address this threat to ecosystem function by including in the wilderness inventory, any potentially suitable lands that serve to secure functioning habitat for migrating species. Results of a FS evaluation of RACR, “highlight the value of inventoried roadless areas toward maintaining a representative network of relative undisturbed areas that function as conservation reserves supporting a diversity of plant and animal species.” Roadless protection

would protect biologically valuable low-elevation roadless areas and complement existing protected areas<sup>1</sup>.

The 5000-acre minimum size criteria is too limiting. The spatial arrangement of remnant unroaded lands and/or restoration of more developed lands is as critical as size in creating corridors f.

### **Threatened and Endangered Species**

The Lolo National Forest is home to several threatened or endangered wildlife and plant species listed under the Endangered Species Act. The inventory should include any areas that protect or facilitate recovery of listed species, including Whitebark Pine. In particular, as a vital conduit for grizzly bear through natural recolonization. The Lolo NF is a connectivity hub that surrounds development and population growth in the Missoula Valley. The public lands of the Lolo NF are critical for connectivity that serves the broader landscape. The Ninemile Demographic Connectivity Area is a key component of the Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy (CS) and all available lands should serve as stepping stones. Sapphire range is also needed for connectivity and any suitable lands should be included in the inventory.

### Geographic Area Comments specific to Recommended Wilderness, IRAs, and Connectivity

All geographic areas on the Lolo National Forest have inventoried roadless areas and other areas that have been managed in a manner to retain values and characteristics that do or could benefit connectivity and species diversity. An overview of We request these areas by compared with the 2006 Lolo proposed plan in the DEIS analysis. Each GA includes numerous tables for: management areas; designated areas; emphasis areas; ROS spectrums; scenic integrity objectives; and lands suitable for timber production. There are also plan components for *select* resource areas and for *select* emphasis areas. A series of seven maps accompanies each GA, including: management areas; conservation watershed network and watershed condition network and municipal watershed map; designated areas; emphasis areas; ROS spectrum, scenic integrity objectives; and lands suitable for timber production and/or harvest. The system of fragmented and overlaying information and maps makes it difficult to see what goes where and how to prioritize competing direction, and in order to comment. Do a

### **Clearwater Upper Blackfoot GA**

According to Table 25—Management areas in the Clearwater Upper Blackfoot GA, 75,574 acres are designated Wilderness and 70,995 acres as recommended wilderness. The 1986 plan ROD proposed/recommended 69,250 acres in the Bob Marshall Addition (BMA) alone and managed the area for wilderness values, and as essential habitat for grizzly bear and gray wolf, the highest protections. Monture Creek at the heart of the proposed wilderness was identified for connectivity value and later found eligible and analyzed for WSR suitability. Monture is not mentioned in the distinctive roles and contributions.

Lolo Amendment 29 (2003) changed 1,921 acres in the Elsin area from MA 11 to MA 10, for snowmobile use in roadless areas. Other areas were considered but eliminated to protect grizzly bear and other wildlife. The Blackfoot Clearwater Stewardship Act, in congress for almost a decade would carve out 6,000 acres of Monture for Otatsy snowmobile area and Spread Mountain mountain biking, weakening protections for wildlife and fisheries. About 80,000 acres of CUB would be designated wilderness if the BCSA passes. By comparison 81,047 acres were recommended wilderness in the 2006 proposed plan, giving all the highest protections without the tradeoffs and other requirements of the BCSA. John Weaver analyzed the Blackfoot-Clearwater River Basin in his report on the Conservation Value of Roadless Areas in the Crown of the Continent Ecosystem, Montana<sup>13</sup>.

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<sup>13</sup> Weaver, John L. 2011. Conservation value of roadless areas for vulnerable fish and wildlife species in the Crown of the Continent Ecosystem, Montana. WCS Working Paper No. 40.  
<https://global.wcs.org/Resources/Publications/Publications-Search-II/ctl/view/mid/13340/pubid/DMX3102500000.aspx>



## **Lolo Cr. GA**

This GA is the landmark terrain for which the Lolo National Forest is named, Lolo Peak. Lolo Creek and Lolo Pass. The area has enormous cultural and historical significance and an impressive list of designated areas, including the 1,524 acre Carlton Ridge RNA. The 2006 recommended 11,100 acres for wilderness, mostly as addition to the Selway Bitterroot. The current PA pulled this recommendation back to 7,204 acres. A local organization, Friends of Lolo Peak successfully advocated against a private ski area and remains active.

## **Ninemile/Petty GA**

In its ecological roles and contributions description for the Ninemile/Petty GA, the PA describes it as, “in the center of the LNF lies nearly 400 square miles of the Ninemile Demographic Connectivity Area (DCA). As part of the Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem, the Ninemile DCA is intended to support female grizzly occupancy and eventual dispersal to the Cabinet Yaak and Bitterroot ecosystems. The Northern Continental Divide Conservation Strategy for grizzly bears includes habitat protections within the Ninemile DCA. See appendix 9 for plan components related to the DCA.”

The GA has over 45,000 acres of IRAs that in effect ring much of boundaries in both the Ninemile and Petty Creek watersheds that feed into the Clark Fork River. Most distinctive are Reservation Divide and Stark Mountain IRA's in the Ninemile and Petty Mountain and Burdett-Garden Point IRAs in Petty Creek. The Stark Mountain Lookout is one of two active lookouts in the Lolo, and this historic feature has been continually staffed since at least 1964. Reservation Divide is home to Cha-paa-qn Peak, of tremendous Tribal significance. Yet the over 16,000-acre Reservation Divide IRA was not carried forward as Recommended Wilderness per the 2006 Lolo Proposed Plan.

**It is important to note that in Appendix 8: Wilderness Evaluation, the evaluation for Reservation Divide IRA is bundled with North Siegal as, “Inventory Polygon ID: 24, Reservation Divide-North Siegal Inventory Polygon Name: Reservation Divide/North Siegal Approximate Acres: 54,989”.**

Nowhere else in the LNF plan is this the case. Both in the revised assessment and in the proposed action, Chapter 2, page 84, Table 17—Inventoried roadless areas in the LNF (NFS acres), Reservation Divide is listed separately as approximately 16,689 acres bordering the Lower Clark Fork and Ninemile/Petty Creek geographic areas. Appendix 8 claims 240 miles of road in this fabricated IRA polygon.

Earlier I expressed an issue with bias, which in my opinion despite excellent work in some of the assessments and even some resource descriptions, has tainted the PA throughout. I don't know if there is a valid reason for **polygon 24**, or if it is an honest error in process or judgement, or if it is due to interference by leadership. Whatever the case, this must be disclosed and corrected. AND I strongly recommend that Reservation Divide carried forward as Recommended Wilderness.

In addition to Reservation Divide, please recommend Petty Mountain and Burdette as recommended wilderness. Joined, the Burdette-Garden Point IRAs are over 22,000 acres that span three geographic areas: Lolo Creek, Middle Fork Clark Fork, and Ninemile/Petty. There is no better definition for connectivity. The roadless rule and Chapter 70 permit roads to be decommissioned and other actions to restore ecological integrity. The description in MA2: Recommended Wilderness show it as suitable for some degree of restoration. This could be a good application. Review Stark for its boundary with S. Siegal-Cutoff.

Petty Mountain is over 16,000 acres in Table 17 but over 33,000 acres as inventory polygon ID 40 in Appendix 8. It spans two geographic areas and up until recently was designated as an MA, not suitable for timber production. The Sawmill-Petty project attempted to change that. As requested above, please review amendments for all the projects on the Lolo that amended the forest plan since 2006.

Per the PA, “Ninemile and Petty Creek watersheds are important producers of native fish including bull trout and westslope cutthroat trout. There are several important and notable ungulate populations in the Ninemile/Petty area. Petty Creek hosts a robust and health bighorn sheep herd, which the Forest Service has worked with partners to maintain and protect. One of the largest all-native mountain goat herds in the U.S. can be found in the Great Burn area on this GA”.

**We strongly encourage the Lolo to expand the Ninemile demographic connectivity area to include Petty Creek in this GA and to include sections of the Great Burn in the Middle Fork GA. This should be added as an objective in the Ninemile-Petty GA that requires coordination to amend the Conservation Strategy for Grizzly Bears in the Northern Continental Divide Ecosystem<sup>14</sup>.**

#### Backcountry

In the PA, approximately 532,154 acres of IRA’s not recommended wilderness represents roughly 25 percent of the LNF. These IRAs are all subject to provisions of the 2001 Roadless Rule and warrant their own management area designation. Instead, these are lumped into Backcountry MA 3. Unlike the 2006 plan, the PA does not differentiate backcountry as non-motorized or motorized. Differentiate backcountry into non-motorized and motorized to facilitate IRA management consistent with the 2001 Roadless Rule. This would help maintain and protect IRA’s integrity for connectivity value. See our comments under Management Area Strategy.

#### Refugia

Thank you for including fire refugia in the forest vegetation (*FW-VEGF-DC-08*) with a well thought out desired condition and in the glossary. We appreciate the comprehensive consideration of refugia in Appendix 3, 3.1.2 Old Growth (OG) A3-8,9). “Because fire activity is projected to increase under future climate scenarios, fire refugia will likely be important component of a wholistic management strategy designed to preserve and recruit old growth. Therefore, management actions should focus on identifying, maintaining, or promoting fire refugia. Currently, both managers and scientists are working to develop management approaches designed to support the formation and conservation of fire refugia. Although the best approach for managing fire refugia is highly context dependent, understanding the location and environmental determinants of fire refugia will be vital for increasing the resilience of old growth. In nearly all situations, minimizing the use of tactics that burn islands of remnant green vegetation behind a flaming front as part of fire suppression efforts on large wildfires would be desirable.” This landscape process would benefit by adding an objective to identify, assess, model and map fire refugia on the landscape within five years. And to add a forestwide guideline if not a standard to vegetation (*FW-VEGF-GDL*).

Thank you for the extra effort in recognizing fire refugia. However, it needs to be emphasized in other resource areas suggestions as disturbance including Forestwide Fire, Fuel, and Wildland-Urban Interface (FFW), importantly as an element of harvest activity with a standard to protect and promote refugia in Management Area 4, and to carry forth as a monitoring element. Refugia is a significant information gap. To fill this gap, research, develop and recruit specialists to implement a model. If refugia are functioning, similar to old growth these ‘ecosystems’ should be maintained and allowed to persist on the landscape without entry for harvest of any kind. Consider refugia as an emphasis area and develop applicable plan components to maintain and with a better understanding of the dynamics and site conditions, to improve and restore.

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<sup>14</sup>Conservation Strategy for Grizzly Bears in the Northern Continental Divide Ecosystem, 2018.

[https://www.google.com/search?q=Conservation+Strategy+grizzly+bear+in+NCDE&og=Conservation+Strategy+grizzly+bear+in+NCDE&gs\\_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRigATIHCALQIRigATIHCAMQIRigAdIBCTE3OTQ0ajBqN6gCALACAA&sourceid=chrome&ie=UTF-8#ip=1](https://www.google.com/search?q=Conservation+Strategy+grizzly+bear+in+NCDE&og=Conservation+Strategy+grizzly+bear+in+NCDE&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRigATIHCALQIRigATIHCAMQIRigAdIBCTE3OTQ0ajBqN6gCALACAA&sourceid=chrome&ie=UTF-8#ip=1)

## Old Growth

It is important that the PA opened this section recognizing the importance of the December of 2023 U.S. Department of Agriculture Notice of Intent to prepare an Environmental Impact Statement and announced a proposal to amend forest land management plans to conserve and steward old-growth forest conditions on national forests nationwide. This proposed national plan amendment is in response to Executive Order 14072 and complements other agency-wide efforts including the Wildfire Crisis Strategy. The purpose of these components is to conserve old growth and support the role these forests play in carbon storage, biodiversity, reducing wildfire risk, enabling subsistence and cultural uses, providing outdoor recreational opportunities, and promoting sustainable local economic development.

The PA should be proactive in preparing for the environmental impact statement. More than 200 forest ecologists and climate scientists, including Jim Hansen and Michael Mann, have written the Biden administration urging it to quickly move forward on the president's commitment to protect old-growth and mature forests on federal lands. The scientists urged an immediate moratorium on logging of federal forests more than 100 years old and requested substantive federal management standards.<sup>15</sup>

Absent in the PA plan components is mention of *mature* forests in recruitment of Old Growth to maintain this critical and dynamic ecosystem. President Biden's April 22, 2022 [Executive Order](#) (E.O.) 14072: "Strengthening the Nation's Forests, Communities, and Local Economies" is referenced in this section but not found in literature cited. The scoping letter also lists "Desired conditions for old growth, and estimated progress toward them". The April 2023 report titled 'Mature and Old-Growth Forests: Definitions, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management. Fulfillment of Executive Order 14072, Section 2(b)' is missing...

There is inadequate emphasis on information gaps in an old growth inventory. While we appreciate a desired condition that old-growth forest conditions are maintained and improved relative to the existing condition over time, the PA lacks an objective to inventory and refine knowledge of existing old growth and *mature* forests at the landscape scale, and to compare these with MA 21 inventory from 1986. Instead of emphasizing or even mentioning the role of mature forests in recruitment for old growth, the components repeatedly reference '*proactive* management' or '*proactive* stewardship'. This term is disturbingly highlighted only in relation to old growth but not defined or in the glossary. [emphasis added]

After attending many public meetings and ranger chats it is clear that industry at the table is eager to 'get into old growth'. So, I assume *proactive management* is intended to satisfy that desire. Define or better still, drop this term. Instead develop desired conditions, objectives, standards and guidelines that emphasize maintenance condition and function of old growth forests and a plan to recruit mature forests into a connected system of old growth forests on the landscape.

Guidelines (FW-OG-GDL) are good but again drop or define proactive management. In the DEIS discuss whether a 'managed forest' fits the definition of old growth. Discuss especially a range of physical and biotic properties that encompass old growth based on an expanded understanding of this ecosystem; such as but not limited to amphibians, mollusks, soil and forest floor fauna, and the fungal community and include these in monitoring.

## Beavers

Thank you for the excellent work recognizing beaver as a keystone species in the LNF revised assessment and in the PA. Please strengthen by adding an object to work with MT FWP and prevent or limit beaver trapping. The assessment chapter 2, page 41 documents the lack of beaver activity as one of the greatest changes to disturbance regimes in valley bottoms. Beavers are ecosystem engineers and key to restore riparian function. Their work can save American taxpayers millions of dollars.

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<sup>15</sup> <https://news.mongabay.com/2024/03/forest-and-climate-scientists-fear-biden-delay-on-mature-forest-protection/>

The assessment, page 43 states, “Beaver have a disproportionately large effect on their environment relative to their abundance (Pollock et al. 2015). One Montana study found 200% higher aquatic invertebrate emergence rates, 60% higher abundance of spiders, and 75% higher deer mice in stream segments with beaver (McCaffery and Eby 2016). Abundant literature exists on beaver impacts on biodiversity and ecological importance, especially in drought conditions. Beaver’s ability to produce wetlands is especially important in the west where riparian and wetland habitats make less than 2 percent of the landscape yet provide habitat for more than 80 percent of wildlife species (Hansen et al. 1995).

The section on Beaver Status and Associated Departure from Historic Conditions documents, “Fifty-four animal species (40 percent) listed as Montana species of concern are rated as not having associated habitat, habitat needs, minor overlap, unknown, or not detriment/beneficial to beaver. This leaves 75 animal species (almost 60 percent) listed as Montana species of concern that are directly impacted by beaver with both positive and negative impacts.

Recent assessment on the extent of existing riparian vegetation versus the potential riparian footprint, has been conducted. Contrasting the current extent of riparian acreage with the acres of potential riparian footprint provides an estimate of how much the presence of riparian vegetation may be departed from potential conditions, and intact riparian and valley bottom ecosystems. The extent of riparian vegetation is far below potential, which coincides with our awareness with lack of beavers as one of several disturbance agents that are needed in valley bottom ecosystems (see section 2.3).

Unlimited beaver trapping is impeding, even stealing from benefits beaver provide to numerous ecosystem services. Consistent with a legal analysis produced through the University of Montana, I urge the Lolo to exercise its “Federal Obligation to Manage and Conserve Fish and Wildlife on Federal Lands <sup>16</sup>”.

### Management Area Strategy

The limited management area designation hampers compliance with laws, regulations, executive orders, the 2012-planning rule. As an example, several geographic areas have only two management areas MA 3 and MA4. This includes the Ninemile-Petty GA, which has the distinction of having the only designated Demographic Connectivity Area for grizzly bear recovery in the existing forest plan (Amendment 44). Both MAs 3 and 4 are 100 percent suitable for timber harvest. The limited MA scheme also misses opportunities such as § 219.8 (1)(vi) Opportunities for landscape scale restoration. Consider adding a management area for restoration, in conjunction with connectivity.

We expect that Forest Supervisor will, as the responsible official demonstrate how she complied with her responsibility under § 219.7 (c) (2), in satisfying the 2012-planning rule specific to providing plan components, “In developing a proposed new plan or proposed plan revision, the responsible official *shall*: (i) *Review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content.* [emphasis added]. (ii) Consider the goals and objectives of the Forest Service strategic plan (§ 219.2(a)). (iii) Identify the presence and consider the importance of various physical, biological, social, cultural, and historic resources on the plan area (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11. (iv) Consider conditions, trends, and stressors (§ 219.6), with respect to the requirements for plan components of §§ 219.8 through 219.11.”

The LNF proposes only five management areas including two for wilderness and recommended wilderness, leaving three management areas including one for concentrated recreation use that represents only 2 percent of the LNF. The LNF management area scheme provides 56 percent of the Lolo in MA 4 General Forest, with a large portion of it suitable for timber production (regularly scheduled timber harvest). The fact that the percentage of suitable for timber production as compared to timber harvest is not provided, but instead refers

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<sup>16</sup> Zellmer, Sandra B.; Nie, Martin; Barnes, Christopher; Haber, Jonathan; Joly, Julie; and Pitt, Kenneth, "Fish and Wildlife Management on Federal Lands: Debunking State Supremacy" (2017). Faculty Law Review Articles. 182. [https://scholarworks.umt.edu/faculty\\_lawreviews/182](https://scholarworks.umt.edu/faculty_lawreviews/182)

the reader to a map in another file demonstrates how unwieldy this ‘scheme’ is. The PA proposes another 26 Percent of the Lolo in MA 3 Backcountry, which is suitable for timber harvest. That is 82 percent of the LNF.

The neighboring Flathead National Forest, an adopter forest for the 2012-planning rule struck a more workable balance. FNF in Table 21 of the proposed action allocated 7 management areas with descriptive and prescriptive subsets providing 16 compartments. The FNF’s Backcountry MA 5 breaks into four prescriptive designations. General forest MA 6 designates low, moderate, and high intensity general forest management, representing 31% of the forest with most of moderate intensity. The FNF MA’s follows the 2006 proposed plan that designated three general forest areas. The low intensity exemplifying multiple use not suitable for regularly scheduled timber harvest, but suitable for timber and salvage harvest for multiple purposes and to achieve desired vegetations conditions to benefit wildlife and a range of resources.

The MA strategy in the Lolo PA is so limited and non-prescriptive, as to be useless without half a dozen overlays for each of the nine GAs. Direction for the overlain resources could even conflict with each. The system of overlays is so complex that without privilege of GIS, it is inaccessible to many members of the public. It becomes more complicated for employees to implement the plan. And more expensive due to additional GIS costs, and more prone to error and issues with enforcement.

As shown in Table 69 the decision to streamline management suitability is so extreme as to designate eighty-two percent of the Lolo within two management areas, both suitable for timber harvest. Some of the overlays are so fragmented as to be buckshot on the landscape. If the purpose is not to have as many as the 28 management areas in the 1986 plan, you’ve succeeded. If the purpose is to simplify the management areas, you’ve failed.

**Table 69—Management areas (NFS acres) Code Management Area**

1 Designated wilderness	147,880 acres (7%)
2 Recommended wilderness	223,919 acres (10%)
3 Backcountry	585,526 acres (26%)
4 General Forest	1,270,340 acres (56%)
5 Concentrated Recreation Use	35,581 acres (2%)

### **MA 3: Backcountry**

Backcountry, represents 26 percent of the Lolo National Forest. As described in Chapter 4, 91 percent of MA3 overlaps with Inventoried Roadless Areas. All IRA’s not recommended wilderness is included in MA3. About nine percent, 54,578 acres includes other lands, though it is unclear what forest service lands constitute the remainder of MA3, perhaps RNA, botanical or other emphasis areas. Please indicate what other lands constitute MA3 and provide a cross walk between the 1986 plan and the propose action as was done in the 2006 proposed plan.

Since MA 3 is mostly IRA, see the reference above on the 2001 roadless rule. “§ 294.13 Prohibition on timber cutting, sale, or removal in inventoried roadless areas. (a) Timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section. (b) Notwithstanding the prohibition in paragraph (a) of this section, timber may be cut, sold, or removed in inventoried roadless areas if the Responsible Official determines that one of the following circumstances exists. *The cutting, sale, or removal of timber in these areas is expected to be infrequent.*

The introduction to MA3 states, “The backcountry MA consists of relatively large areas characterized by an environment influenced primarily by natural ecological processes such as natural succession, fire, insects, and disease. *These areas provide a variety of motorized and nonmotorized recreation opportunities that are generally primitive or semi-primitive in nature. They also contribute to the habitat needs of species that require seclusion or connectivity of large, relatively undisturbed areas.* [emphasis added]. Since the provenance of MA 3 is inventoried roadless areas, based on and managed to protect natural integrity are

included in MA3, it appears the bias is toward both *motorized* and non-motorized recreation opportunities *while also contributing to the habitat needs .....*” [emphasis added].

There is obvious disconnect between motorized uses and the provenance of this management area as IRAs. As described in the roadless rule these areas were designated due to possessing values and characteristics that provide, “clean drinking water and function as biological strongholds for populations of threatened and endangered species..... large, relatively undisturbed landscapes are important to biological diversity and long-term survival of many at risk species, opportunities for dispersed outdoor recreation... that diminish as open space and natural settings are developed elsewhere. . . ., are bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research<sup>17</sup>. (pg. 3245).

In part, the DCs sound good but semi-primitive recreation is not a desired condition in a roadless area. It diminishes the purpose for which these areas were designated. Fifty-six percent of the forest is suitable for motorized. Is that not enough for people who prefer that experience?

MA 3 DCs:

**01** Backcountry areas provide for less developed, semi-primitive recreation opportunities with motorized travel allowed consistent with desired recreation opportunity spectrum settings. Quiet, nonmotorized recreation uses predominate and these areas offer opportunities for self-reliance.

DC 01 hits like a slap in the face. Rearrange the wording: Backcountry areas provide for quiet non-motorized recreation uses that offer opportunities for self-reliance. Opportunities for motorized travel could occur in a subset of the area where roads already exist. Roads and opportunities for motorized travel are infrequent and where appropriate are clearly delineated and mapped.

**02** Natural processes play their role and human use leaves little permanent or long-lasting evidence.

**03** Fire and other natural ecological processes play a major role in influencing vegetation conditions, with a relatively low level of human influence.

**04** Backcountry areas provide large, undisturbed, and unfragmented areas of land. These large land areas sustain high quality or undisturbed soil, water, and air and a diversity of plant and animal communities. They also provide for habitats for species that are dependent upon large, undisturbed, unfragmented areas of land.

**05** Landscapes in backcountry areas are naturally appearing with high scenic quality.

Standards (MA3-STD):

**01** New special uses shall be compatible with management of the backcountry area character.

**02** Exceptions to the backcountry area standards in chapter 2 and chapter 3 shall be allowed to provide for reasonable access and mining activities pursuant to the 1872 Mining Law. New access to and development of minerals shall minimize impacts to backcountry areas.

These standards are unclear. Say what you mean. As cited above on pages 4-5, “Components are to be integrated, written clearly, concisely, and without ambiguity, and *include desired conditions, objectives, standards, guidelines, goals, and suitability-of-land determinations*. Taken together, plan components establish the vision of a plan, set forth the strategy to achieve it, and *provide the constraints of subsequent management*.” [emphasis added]

The ambiguity and lack of clear on the ground mapping and direction for backcountry, areas where many people would recreate, would be clumsy for the public to understand what they could do and where. The scheme would be difficult for even knowledgeable employees and contractors and open to error. It’s an enforcement nightmare, would muddy monitoring waters, and the LNF should be prepared for escalating costs for personnel, paper and ink associated with GIS for map production.

It is essential to differentiate between motorized and non-motorized use without the user having to overlay ROS maps. Please create subsets to this MA: MA3 Backcountry non-motorized (default color); MA3A

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<sup>17</sup> Federal Register 2001 roadless rule: <https://www.govinfo.gov/content/pkg/FR-2001-01-12/pdf/01-726.pdf>

Backcountry motorized summer (on designated roads), MA3B motorized over-snow. Mapping should be easy: MA3 the default color, Mas 3A and 3B depicted by cross-hatching. The forest user does not necessarily have the capacity to access Recreation Opportunity Spectrum maps based on summer and winter use.

#### **MA 4 General Forest**

Management Area 4: General Forest, represents 56 percent of the Lolo National Forest and has **NO** goals, objectives, standards or guidelines. MA 4 offers so little strategic direction as to have only three desired conditions, two of which are permissive multiple uses related to the transportation system and recreation. One of these is, “03 Vegetation management activities (including timber harvest, thinning, and prescribed fire) have a role in affecting the composition, structure, and pattern of vegetation and maintaining or trending vegetation towards the desired conditions. Natural disturbances, such as unplanned fire, insects, and disease, are also present in the landscape.” A desired condition to have natural disturbances present on the landscape is excellent. But realistically on an area covering 1,270,340 acres, is outside managements control. There are no goals, objectives, standards, or guidelines with which to comply with the requirement to meaningfully monitor actions and conditions on this MA in order to inform and adjust course based on adaptive management.

Forestwide direction for other resource areas such as forest vegetation (FW-VEGF) and timber (FW-TIM) apply and provide some prescriptive constrains to MA4. Despite the PNC 2.2.1 Integrated Resource Management, bullet 5, a need to shift from output-based to outcome-based planning, direction for timber clearly prioritizes economic values over ecological. “The removal of timber is a multiple use provided by LNF and it is an *important contributor to the economy* of Montana. Timber harvest on NFS lands occurs for many reasons. *Whether it is conducted for regularly scheduled wood production or for other reasons, timber harvest supports local businesses and employment.*” [emphasis added]. MA4, is not consistent with integrated resource management. The DC’s are all out-put based, not outcome-based. Standards still refer to clear-cutting.

#### Desired conditions (FW-TIM-DC)

- 01** Lands identified as suitable for timber production support a regularly scheduled timber harvest program that provides for jobs and income while also sustaining ecological integrity.
- 02** Timber production and harvest contribute to ecological sustainability and ecological integrity while contributing to economic sustainability, providing jobs, and income to local economies.
- 03** Lands suitable for timber production are resistant to natural disturbances, thereby minimizing the economic loss of the timber resource compared to lands designated as unsuitable for timber production.
- 04** Timber harvest supports maintaining regional timber harvesting and processing infrastructure.
- 05** A variety of harvest and contract methods are offered in response to market demand and local needs.

#### Standards (FW-TIM-DC)

- 03** On lands both suitable and unsuitable for timber production, silvicultural treatments shall not be selected based solely on their ability to provide the greatest dollar return or output of timber; other considerations such as the purpose and need shall inform the selection of silvicultural treatments.
- 04** On lands both suitable and unsuitable for timber production, clearcutting shall be used as a harvest method only where it has been determined to be the method most appropriate to meet the purpose and need of the project. Other types of even-aged harvest shall be used only where determined to be appropriate. Determinations shall be based on an interdisciplinary review of site conditions and the desired conditions for vegetation, wildlife habitat, scenery, and other resources.

MA4 covers a large area that undoubtedly has many variables. The absence of standards and guidelines to implement management constrains and that apply specifically to MA 4; no direction for prioritization of resources and limitations including for the as of yet undeveloped connectivity plan; where constraints might apply on the landscape if anywhere; and adding significantly to GIS workload; all contribute to problems implementing the plan. As stated on page 4, “every project and activity must be consistent with the

applicable plan components” (36 CFR §219.15[b]). Components are to be integrated, written clearly, concisely, and without ambiguity, and *include desired conditions, objectives, standards, guidelines, goals, and suitability-of-land determinations*. Taken together, plan components establish the vision of a plan, set forth the strategy to achieve it, and *provide the constraints of subsequent management.*” [emphasis added]

The PNC to place less emphasis on more prescriptive components does not provide adequate constraints on subsequent management and deviates from the 2012-planning rule. Please provide more descriptive subsets for general forest. Again, both the 2006 proposed plan and the FNF proposed action are good examples.

### **Comments specific to the Ninemile-Petty GA – Cassandra Rideg**

We appreciate that the Lolo has done a great job of including and guiding public involvement, but our families are overwhelmingly disappointed in the lack of urgency the NFS, including the Lolo and other government agencies are displaying to meet federal goals of environmental forward thinking. The data is in; we know the steps we need to take, have to take, and have been directed to take, and yet the NFS is not complying with the Executive Order to deliver 30% wilderness into protection by 2030. We haven't even started. This Executive Order was a Presidential directive!

Other NGOs that we cooperate with and are completely aligned with have already made general comments on the entire Draft Plan very thoroughly. Our comments specifically with the Lolo National Forest (LNF) section where we live. The LNF surrounds the Ninemile Valley on three sides. The Ninemile Valley community is a small, primarily agricultural and residential community with tremendous respect and pride for the place we live and the public wilderness lands surrounding us.

Though most of the Ninemile valley was logged in the past, we do have Old Growth stands, and now, there is much Mature Growth Forest. Mature Growth forests were recommended for protection by the Executive Order. The NFS should protect Mature Growth sections. Mature Growth should be considered and included in the new Draft Plan for LNF. If it is, I was unable to find a reference to it. This oversight is not acceptable. These areas are critical to the survival of the forest, flora, fauna, and the ecosystem as a whole.

We have a tremendous opportunity in the Ninemile Watershed to protect connectivity corridors. In recent years, we have seen many examples of this. Outside Glacier National Park and the Northfork of the Flathead River drainage, we had the very first reproductive wolves in Montana. We have Beaver moving in. There is potential habitat for lynx and possibly Wolverine. We also have seen more frequent Grizzly Bear presence. Earlier this week, a confirmed sub-adult Grizzly was confirmed in the valley. Ninemile Watershed is a well-documented, prime wildlife corridor.

Because of all this significant wildlife activity, rural character, and recreation use by the public, I have a difficult time understanding why Reservation Divide has dropped off the current Draft Plan as Proposed Wilderness. It appeared on a map from 2/6/2006 and in the documents used in preparation for the 2012 Planning Rule. This area is virtually roadless, and surrounding areas, such as sections of Ch-paa-qn Peak Road, are in the process of decommissioning roads by the FS. From 2006 to today, these forests have become even more mature than they were then. It is absolutely infuriating that Proposed Wilderness areas have been dropped off the new Draft Plan due to the current environmental crisis. Please correct this significant oversight. The NFS should designate all IRAs areas within the Lolo NF as proposed wilderness.

Respectfully,

/Claudia Narcisco  
Missoula, MT

/Cassandra Rideg  
Resident, Ninemile-Petty Geographic Area