



January 23, 2025

Lolo National Forest
Attn: Jeremy Casterson, Acting Forest Supervisor
24 Fort Missoula Road
Missoula MT 59804

Re: Comments on the [Lolo Prescribed Fire Project Scoping](#)

Dear Acting Forest Supervisor Casterson,

American Rivers appreciates the opportunity to submit the following comments on the 20-year prescribed fire plan for the Lolo National Forest, The Nature Conservancy lands, and adjacent portions of U.S. Bureau of Land Management lands.

About American Rivers

Since 1973, American Rivers has protected wild rivers, restored damaged rivers, and conserved clean water for people and nature. With headquarters in Washington, D.C. and 355,000 supporters, members, and volunteers across the country, we are the most trusted and influential river conservation organization in the United States, delivering solutions to reduce pollution in rivers, improve clean water access, and safeguard public drinking water supplies. We have offices in every region of the country, including in Montana, where many of our members live, work, and recreate on the Lolo National Forest.

Concerns about protections for wild and scenic eligible streams

American Rivers acknowledges the risks that increasingly frequent high-severity wildfires pose to western Montana communities, public lands, and rivers. We generally support the Lolo National Forest's long-term goal to reintroduce fire to restore ecological balance, manage fuels, and improve public safety. We support the Lolo National Forest's proposal to only use small tree thinning in conjunction with prescribed fire to improve ecosystem resilience under the provisions of this plan.

However, the scoping document makes no mention of wild and scenic eligible streams, and how the use of prescribed fires will or will not protect and enhance the outstandingly remarkable values (ORVs) of these streams. In addition to the numerous design features specific to aquatics/fisheries/hydrology that reference considerations within Inland Native Fish Strategy (INFISH) and Riparian Habitat Conservation Areas (RHCAs) boundaries, we strongly recommend adding a design feature within Appendix A specific to wild and scenic eligible stream boundaries to ensure that the Lolo National Forest upholds its legal obligations under the Wild and Scenic Rivers Act to protect and enhance outstandingly remarkable values.

The Lolo National Forest will complete its forest plan revision within the next 1-2 years, and it has already proposed 21 streams for wild and scenic eligible protection. Under the existing forest plan, nine of these streams are already managed as wild and scenic eligible. Given the substantial geographic (forest-wide) and temporal (20 years) scopes of the prescribed fire plan, requirements for river mitigation activities within wild and scenic eligible corridors must comply with obligations to protect and enhance outstandingly remarkable values.

We bring this omission to the attention of the Lolo National Forest not because we see river protection and wildfire mitigation as incompatible—quite the opposite, in fact. Wild and scenic eligibility and designation are expressly compatible with both restoration and wildfire mitigation activities. We also agree with regional and national Wild and Scenic River leaders within the Forest Service that myths to the contrary continue to perpetuate and negatively hamper both forest management decision-making and river protection efforts by the agency. Specifically, the Forest Service Handbook recommends:

“A range of vegetation management and timber harvest practices are allowed, if these practices are designed to protect users, or protect, restore, or enhance the river environment, including the long-term scenic character.”¹

Summary by classification from FSH 1909.12 Section 84.3(9):

Wild Rivers

Cutting trees and vegetation allowed for:
primitive recreation experiences, safety,
protection of ORVs, prescribed fire and wildfires
(to meet resource objectives or restore/maintain
T&E/sensitive species habitat)

Scenic/Recreational Rivers

Range of vegetation management and timber
harvest practices allowed for: safety,
protection/restoration/enhancement of the river
environment

As such, when applied on the Lolo National Forest, adding consideration of wild and scenic eligible streams to the project design features, where activities are proposed within eligible corridors, will document how vegetation management and prescribed burning both achieve fire mitigation goals *and* protect and enhance river values. We acknowledge that additional considerations to retain streamside shade cover to reduce water temperatures and increase or retain woody debris may alter prescribed burning plans in these river corridors. We also acknowledge that short-term tradeoffs—e.g. temporary recreational closures, burned area runoff, and changes in scenery—will be required to achieve long-term protection and enhancement of outstandingly remarkable scenic, recreational, and fisheries values including natural streamside forest mosaics, increased availability of woody debris, and reduced risk of catastrophic wildfires in river corridors.

In conclusion, American Rivers appreciates the opportunity to support fire mitigation plans on the Lolo National Forest, and we strongly suggest inclusion of wild and scenic eligible river protections within project design features to document how vegetation management and prescribed burning both achieve fire mitigation goals *and* protect and enhance river values.

Warm regards,



Lisa Ronald
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¹ FSH 1909.12 Section 84.3(9)