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Comments: Montana Wilderness Association (MWA) appreciates this opportunity to further comment on the Lolo National Forest[rsquo]s Superior District Redd Bull Project. Since 1958, Montana Wilderness Association has worked with communities to protect Montana[rsquo]s wilderness heritage, quiet beauty, and outdoor traditions, now and for future generations. MWA[rsquo]s membership base includes over 4,000 Montana households, including a number of households in Mineral County.

The Redd Bull Project area includes three inventoried roadless areas (IRAs) that offer important wildlife security zones, unique recreational opportunities, and represent an increasingly rare, unfragmented landscape type. These IRAs fall within a region identified as The Great Burn and String of Pearls that make up a chain of wild and roadless unprotected land stretching nearly 100 miles along the Idaho-Montana border that contain a mosaic of old-growth forests, lush meadows, alpine tundra, dramatic cliff faces, and crystal-clear lakes and streams. The Great Burn and String of Pearls is a keystone wildland connecting the Crown of the Continent and Selkirk-Cabinet-Yaak ecosystems with the Greater Yellowstone Ecosystem and central Idaho[rsquo]s wildlands. MWA[rsquo]s comments are in recognition of maintaining these social and ecological values, with particular interest in corridor connectivity for important wildlife species and fisheries habitat restoration and protection.

The originally visioned Redd Bull Project was a fisheries and aquatic restoration initiative. The project[rsquo]s vision has expanded since, and the Environmental Assessment (EA) released in July 2020 acknowledges that the project not only restores native fish habitat, but is intended to also improve the health and resiliency of forest vegetation, reduce forest fuels, enhance big game habitat, provide diverse recreation opportunities, and support the economic structure of local communities.

MWA has taken note of this project because it proposes management activities in three inventoried roadless areas (IRAs) [ndash] Marble Point (12,607 acres), Sheep Mountain-Stateline (67,479 acres with 3,732 acres within project area), and Ward Eagle (8,570 acres with 4,843 acres within project area).

The comments MWA submitted during the EA phase were largely addressed in the released Draft Decision Notice, with the exception of our comment regarding a project timeline. MWA appreciates the attention given to our comments during the Scoping and EA phases. There are two project elements, the South Little Joe Road and Marble Creek IRA timber treatments that we have provided objections about to follow. These objections are intended to retain the project[rsquo]s focus on fisheries and aquatic restoration, manage IRAs in accordance with the 2001 Roadless Area Conservation Rule, account for grizzly bear habitat needs, and promote recreation opportunities that are in keeping with roadless area values and respectful of wildlife security zones.

Proposals Within Inventoried Roadless Areas
Our Scoping and EA comments objected to Marble Creek IRA timber treatments that overlap with areas identified as a potential linkage zone for grizzly bear (EA Pg. 82). We asserted that timber harvest activities and associated

roads would likely negatively impact grizzly bear use of this habitat now and in the future. The comment responses indicated that these IRA treatments would not be an issue because the modeled linkage zone looked at only valley bottoms, i.e. riparian zones, and the proposed treatments would maintain a mosaic of forested cover, open road density, and secure habitat percentage.

The best available research, however, demonstrates that forest roads have negative impacts on wildlife and forest resources. This includes grizzly bears, which strongly avoid open roads and motorized trails. Minimizing road density and presence will positively influence grizzly bear security and habitat use. This research is influencing the closure of roads elsewhere in the Lolo National Forest, such as through the BMU22 Project on the Plains- Thompson Falls District. Mace et al. 1996 and Mattson et al. 1996 provide guidelines for road density for grizzly bears at >0.6km/km2. Although these roads may not be directly located in the riparian zones and valley bottoms they are likely to have a negative impact on grizzly bear use of this area and the overall road density should be minimized.

MWA supports the prescribed burning in the draft Decision Notice and continues to advocate that implementation of these burn treatments for the Marble Point and Ward Eagle do not require the creation of any new roads or reopening of decommissioned or closed roads.

Restore Native Fish Habitat

The creeks within the Redd Bull Project area previously supported healthy bull trout populations, but few remaining viable populations remain today, primarily in Cedar Creek and Little Joe Creek. This project has repeatedly acknowledged that the aquatic habitat in the project area is under stress and at risk from roads.

The draft Decision Notice will move the South Fork Little Joe Road further away from the riparian corridor in order to minimize negative road impacts on this fishery, but the project

neglected the Alternative that would have maximized opportunities for bull trout spawning restoration, Alternative 3, which would have decommissioned 2.5 miles of NFSR 221. As asserted in our previous comments, the road hardening that would happen along South Fork Little Joe Road in lieu of road decommissioning will likely have unintended consequences to fisheries habitat that will negate intended offset and mitigation impacts.

Montana Fish, Wildlife, and Parks and other wildlife management professionals opposed a Federal Forest Highways proposal to pave the North Fork Little Joe Road along sensitive fisheries habitat, and that project was discontinued, and those concerns would be applicable to road hardening along the South Fork Little Joe Road as well. Negative impacts of road hardening might include an increase in average traffic speeds and the frequency of wildlife collisions.

While the road decommissioning would negatively impact recreation access by eliminating some dispersed camping sites along the creek, increasing drive times to this area, and potentially shortening the effective season of the road due to the elevation increase, it is important to note that Little Joe Creek is only one of two remaining active migratory bull trout spawning creeks remaining in this area, where there previously were at least 20 active migratory bull trout spawning creeks. The dwindling opportunities for migratory bull trout, a threatened and endangered species, and the protection this decommissioning would afford to this active creek justifies the impacts to human recreation that would be incurred.

Provide Diverse Recreation Opportunities

MWA supports the draft Decision Notice[rsquo]s recreation proposals for Cliff, Diamond, Hazel, and Hub Lakes. We also appreciate the decision to delay decisions related to the Stateline trail until an appropriate time when the trail[rsquo]s entire length can be evaluated by all three managing forests. We request being kept apprised of how and when that process will take place so that we can participate.

Per our earlier comments, MWA does not support the creation of new, motorized trails within IRAs, such as Trail #203 in the Marble Point IRA. As mentioned in the proposals within inventoried areas section above, motorized use has negative impacts on grizzly bear habitat use, and although grizzly bears are not yet resident in this area, they are occasionally present, as acknowledged by the EA (pg. 79). Grizzly bears will likely become resident in the project area within the next two to three decades. IRAs provide important, secure habitat for grizzly bears and this project should proceed with the foresight that road densities have significant impacts on grizzly security. Trail #203 is between Cold Creek and Reeves Creek, an area which has been identified as one of two linkage zones in this regional area for grizzly bear between the Northern Continental Divide and/or Cabinet-Yaak recovery zones to the Bitterroot recovery zone (EA pg. 82).

MWA does, however, support the opening of road #7848 seasonally for motorized use. Road #7848 is outside all IRAs in the project area and does not follow a river or creek drainage, which will result in minimal to negligible impacts on fisheries habitat. It presents an opportunity for increased motorized access without increasing the overall motorized footprint in the project area.

Timeline

Our previous comments encouraged the development and sharing of a timeline that clearly outlines the sequence of actions, as well as associated monitoring, that will take place across the full scope of the project. This was not included in the draft Decision Notice and MWA continues to recommend sharing of such a plan with the public.

In conclusion, MWA appreciates the thorough efforts by the Superior District to acknowledge our scoping and EA comments, as well as the objection comments submitted above. We encourage the Lolo National Forest to continue to foster an open, transparent, and nonexclusive NEPA process that will extend through project implementation. Montana Wilderness Association, and our membership, look forward to continued opportunities to engage in the Redd Bull Project.