Data Submitted (UTC 11): 7/7/2023 11:41:18 PM First name: Sarah Last name: Bates Organization: Title: Comments:

Comments on Dra Assessment, Lolo Na onal Forest July 6, 2023

Dear Forest Planning Team:

Thank you for the opportunity to review and comment on the dra assessment for the Lolo Na onal Forest Plan revision. I am commen ng as a private ci zen, regular recrea onal visitor to the Lolo Na onal Forest, and lifelong conserva on professional. I contributed to the team that developed comments on behalf of the Great Burn Conserva on Alliance, and submit these as supplemental, complementary input for the process, re?ec ng my own perspec ve.

My remarks focus on the dynamic interplay of land and water in the valley bo oms and riparian corridors throughout the forest. In light of current and projected climate disrup ons, the forest's resilience will depend in large part on how these ecosystems are protected and enhanced under the guidance of the revised forest management plan.

I've referenced the speci?c sec ons to which my comments apply, but urge the planning team to be er integrate all sec ons of the assessment to recognize the rela onships between various components and in?uences on forest health.

Sec on 2.1.2: This sec on correctly notes that riparian corridors can provide refugia during ?res, and that the species characteris c of riparian corridor facilitate post-?re recovery. This sec on should reference the excellent discussion in Sec on 2.1.4. about the valuable role that beavers play in maintaining and expanding these riparian habitats. Moreover, it would be appropriate to cite and incorporate research indica ng that beaver-in?uenced streams provide natural ?re breaks, mi ga ng the trend toward more frequent and intense ?res. (E.g., Fairfax, E. and Whi le, A. (2020), Smokey the Beaver: beaver-dammed riparian corridors stay green during wild?re throughout the western USA. Ecol Appl. Accepted Author Manuscript. doi:10.1002/eap.2225.) The assessment should recognize this method of mi ga ng ?re, in addi on to the discussion of fuels reduc on, and generally should be er recognize the importance of green infrastructure and nature-based solu ons to climate disrup ons. Sec ons 2.1.5. and 2.3.3: As a result of climate disrup ons, headwater streams in the Lolo Na onal Forest likely will trend toward intermi ent late-season ?ows, with impacts on riparian vegeta on and the wildlife that depend on this habitat. This is another opportunity to highlight the role of beavers in helping to hold water back and enhance late-season ?ows. Beavers could serve as a focal species not only for watershed condi on, but also for landscape resilience in the face of climate disrup on. Sec on 2.1.11: This sec on appropriately describes impacts of roads and other human-built infrastructure on aqua c ecosystems and riparian health. It should addi onally note that road reloca on (accompanied by restora on, as has been done in Cedar Creek) can be a valuable means to reduce impacts, par cularly in the "many miles of roads within 100 feet of waterbodies where roads can impair the natural func on of riparian and aqua c ecosystems."

Sec on 2.3.2: The dra assessment describes a lack of informa on and understanding about how far the valley bo oms in the Lolo Na onal Forest are departed from historic condi ons. This sec on should be integrated with the discussion of ecological integrity (Sec on 2.2.1), in par cularly highligh ng the opportunity to manage the valley bo oms to restore more complex, resilient systems, keying in on beaver presence or absence (i.e., focal species) as an indicator of departure from (and poten al return to) historic range of varia on.

Thank you for the opportunity to provide input on this dra assessment.

Sarah Bates