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To: Lolo Forest Plan Revision Team

Thank you for the opportunity to comment on the Proposed Action for the Lolo National Forest Revised Forest Plan. I commend the Forest in making major improvements over the prior Forest Plan, especially in developing and using Geographic Areas (GAs) as a basis for place-based management and the extent of the Forest recommended for Wilderness and Backcountry uses. I also appreciate the [ldquo]Reader[rsquo]s Guide[rdquo] that helps locate specific items throughout the document.

I recognize that public comments are intended to help you develop Alternatives for Plan Revision and offer the following comments with the expectation that they will be of help as you move forward with plan revision. Although I fully support managing vegetation and using prescribed fire to achieve multiple-use and ecological restoration goals, I am particularly interested in how you propose to develop and incorporate direction for the (1) Range of Natural Variation (RNV) and (2) Habitat Connectivity in your Final Revision.

From a broad-scale coarse filter perspective, I recommend that you: (1) add [ldquo]Connectivity[rdquo] as a specific issue; (2) develop and display a Forest-wide [ldquo]Connectivity Map[rdquo] that can be revised periodically and used as a coarse filter for guiding management; (3) use [ldquo]Habitat Connectivity[rdquo] as a major criterion for setting management direction for Roadless Areas (RAs) and; (4) create additional Management Areas (MAs) to better reflect management intensity.

From a fine filter perspective, I would like to see more refined direction (Desired Conditions, Standards and Guidelines) by GA for: (1) rare and/or declining habitats; (2) Species of Conservation Concern (SCC); (3) habitat connectivity; and (4) motorized use (including motorized recreation).

Expansion on the above points include:

1. Connectivity should be a specific Forest Issue. Because the Lolo is strategically located between the Grizzly Bear Recovery Areas, special consideration should be given to connectivity. Making connectivity an additional issue would not only help in the development of Alternatives, but would also aid in refining Desired Conditions, Standards and Guidelines.
2. You should develop and display a Forest-wide connectivity map that is based on the best and most recent science. The Revised Plan should be constructed and worded in a manner that permits continual updating and use of the most recent connectivity map to aid in [ldquo]adaptive management[rdquo] without having to amend to the plan.
3. For any given alternative, each Roadless Areas should be screened for its potential contribution to wildlife habitat security and/or habitat connectivity before it is recommended for more intensive management. As a minimum, I recommend that you do not reduce the amount of recommended Wilderness in any alternative below that which you have recommended in your Proposed Action. All remaining Roadless Areas should be evaluated for their potential contribution to Core Habitats, Corridors and Habitat Linkages at the broad scale and as rare or special habitats for priority species (TES, SCC and focal species) at finer and more local scales. Recommending

Roadless Areas for recommended Wilderness, Backcountry, Research Natural Areas and Special Areas (such as the Ninemile Demographic Connectivity Area (DCA)) should be given consideration prior to allocating the Roadless Areas to General Forest management direction.

4. You should increase the number of Management Areas to better identify the management priorities and intensities for a given Geographic Area. Backcountry Management needs to be broken down into more categories that better describe what is expected to occur in specific areas, especially the type, extent and timing of motorized recreational use. (If such direction is too detailed, you should at least establish and disclose specific criteria that will guide the development of subsequent Travel Plans.)

Creating MAs for Semi-Primitive Motorized and Semi-Primitive Non-Motorized categories which are already ROS classifications that are well defined and understood by the public would help in clarification. By having these as two separate MAs, the potential conflicts between motorized and non-motorized forest users could be better revealed and potentially resolved. A Backcountry Restoration MA could be created to identify where low intensity restoration activities would be permitted while retaining many backcountry attributes.

General Forest is too broad and inclusive of a category to distinguish among the wide array of management actions that could occur within a GA. This MA should be refined and be more specific. For example, General Forest could be broken down into: Commercial Forest where timber production is the primary goal; Ecological Restoration where less intensive vegetation management, prescribed fire and watershed restoration are management priorities; Scenery where visual quality is most important; and Wildlife Habitat Enhancement where treating vegetation such as on big game winter range is the highest priority. These break-downs would provide additional more detailed descriptions of potential management actions while keeping the total number of MAs within reasonable limits.

1. The number and location of Geographic Areas is a great improvement and these areas should be carried through all alternatives. These Geographic Areas not only provide for better place-based management direction, they also accommodate the finer resolution of management direction (plan components) that is necessary to provide for the special habitat attributes to maintain or improve conditions for rare and/or declining habitats, Species of Conservation Concern, focal species and habitat connectivity.

Each Alternative should have unique guidance that identifies the Desired Conditions (and other plan components) for: rare and/or declining habitats; Species of Conservation Concern (SCC); focal species; and habitat connectivity within the various Geographic Areas. Unique GA specific Standards and Guidelines should be written to complement Forest-wide direction in achieving the desired conditions for each GA. All plan components should work together within the range of natural variation (RNV) to achieve the desired distribution of patch sizes, tree sizes, and stand densities to meet desired species habitat needs and habitat connectivity goals over time.

Thank you for the opportunity to comment on your Proposed Action. You have made some significant improvements over the currently outdated plan. I realize that some of my suggestions are very specific and some of them require changes in how your Plan is structured (adding the number of MAs, for example). I also realize that there are numerous ways in achieving the same objective. My comments are intended to be constructive and I hope that they are useful and that you can use them regardless of how you structure your final document. I look forward to remaining involved as you progress with Plan Revision.

Skip Kowalski, Retired Wildlife Biologist, USFS