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To: Carolyn Upton, Forest Supervisor Lolo National Forest

Subject: Lolo National Forest Land Management Plan Revision [ndash] Proposed Action January 2024 [ndash]  
Public Comment

As a resident of Missoula County and a retired U.S. Forest Service career scientist, I'm a frequent 4-season recreational visitor throughout the Lolo National Forest (LNF). In addition, I depend upon road access and timber and fuels management for a sustainable supply of firewood as my primary source of heat for my home.

More importantly, I recognize the critical importance of a well-developed and detailed Forest Plan in guiding the LNF in the responsible management of National Forest System (NFS) lands to achieve ecosystem function and health. I propose the following desired ecosystem management desired conditions become incorporated into the LNF Proposed Action and apply to all resource areas within the LNF.

1. Maintain and restore watersheds and their functions in order to provide a sustainable supply of clean water to streams, rivers, lakes and aquifers.
2. Maintain and restore the long-term ecological health and functions of forests, meadows and wetland habitats which include providing for a diversity of plant and animal species;
3. Maintain and restore well-connected wildlife and aquatic habitats throughout the LNF and onto adjacent land ownerships to provide for the genetic viability of all wildlife species including terrestrial and aquatic organisms.
4. Maintain and restore the LNF's forest's soil ecosystem through the protection of sufficient classes and quantities of downed woody debris across the forest floor, and protecting and restoring soil physical conditions to support watershed ecological functions and for mitigating the effects of global climate change.

In order to achieve these desired conditions, I expect that specific resource objectives aimed at achieving these conditions would be developed and disclosed in this Proposed Action for each of the Resources of Timber, Transportation (roads), Recreation/Trails (both developed and dispersed and winter/summer), Fire and Fuels, Silviculture, Range and Special Uses. Specific standards and guidelines for each of these resources would also be developed within this Proposed Action aimed at achieving specific resource objectives. These Desired Conditions and their corresponding Objectives and Standards and Guidelines together would eventually be incorporated into an Alternative for the LNF Forest Plan. I did not find either the desired conditions, adequate objectives, or detailed standards and guidelines in this Proposed Action sufficient to support the desired conditions I've listed above.

All proposed management actions, as well as those actions proposed by the public on NFS lands, should be required to move current forest ecosystem conditions towards achieving those desired conditions I've listed above. If the FS management action for a particular resource area, or proposed action by the public, does not move conditions towards meeting broad ecosystem objectives through the incorporation of standards and guidelines in the action, then the manager must not proceed with the action until such time the proposed action can be modified so that it does move conditions towards meeting the ecosystem objectives.

I object to language within the current Proposed Action's standards and guidelines that suggests that budgetary short-falls may be an acceptable reason for not implementing standards and guidelines for a particular

Resource. For example, it would be unacceptable if a TSA decided that an insufficient timber budget within a particular year was reason for not accomplishing an Aquatic Resource objective within a Timber project boundary. This likely would result in the aquatic objective and corresponding standard and guidelines being eliminated from the project and the impairment of the aquatic resource to continue or be further impacted.

I support a US Fish and Wildlife decision establishing grizzly bear recovery in the Bitterroot Ecosystem. As such I expect the LNF Plan to incorporate grizzly bear management areas, objectives and actions consistent with providing secure habitats, minimizing roads and recreation disturbances, eliminating risks of injury and mortality from trapping or baiting, and identifying and managing connectivity linkage corridors across the LNF and between populations in the NCDE.

Additional Proposed Action (PA) comments are identified below numerically, followed by chapter/section, page, issue and recommended action.

1) 1.6 Project and Activity Consistency with the Plan, pg 10

Issue: Insufficient resource integration on project consistency with Plan.

Use of the phrase [ldquo]Applicable Plan Component[rdquo] is not defined within the PA[rsquo]s Glossary. That phrase and the wording in this section, requiring ONLY that the project or activity [ldquo][hellip]must be consistent with the applicable plan components[rdquo], appears to ignore the requirements under the 2012 Planning Rule requirements for developing plan components that are integrated across resources (see Section 2.2.1, pg 5 of Preliminary Need to Change).

The example provided of a recreation desired condition and its relevancy to a fuels treatment project indicates that a determination would be made regarding a planned activity (fuels) and whether the activity is interconnected in potential effects with another resource (recreation) and that determination may establish the narrow scope of a forest plan consistency determination. Using another example, such an approach may lead to a planned road project in a riparian area being deemed not relevant to an aquatic resource[rsquo]s desired conditions leading to the road activity, by itself, being deemed [ldquo]consistent[rdquo] with the plan as the only [ldquo]applicable plan component[rdquo]. Applying such a simplified Forest Plan consistency determination to the road as the only [ldquo]applicable plan components[rdquo] would fly in the face of current scientific knowledge on roads and watershed/aquatic effects. Recommendation: this section be rewritten to reflect an integrated resource approach toward evaluating and determining consistency with the Plan, while more accurately carrying out the requirements under the 2012 Planning Rule.

2) Chap 2.1.1, Nonforested Veg (VEGN) Desired Conditions, pg 23

Issue: Omission of Riparian/Wetland vegetation from Table 8.

While [ldquo]Riparian/Wetland[rdquo] is listed in the body of the 1st para. as one of six nonforested Reg 1 potential veg types on the LNF, it is absent from the Table 8. While representing only between 1-3% of LNF landscape area, riparian areas are typically not nonforested, although they should not be considered as forested for timber production. These small landscape areas are critically important in supporting ecosystem processes which include the storage and movement of water, development of soils, diversity of vegetation species, cycling of nutrients as well as habitat for riparian dependent wildlife species. Recommendation: The LNF needs to provide a desired condition for [ldquo]Riparian/Wetland[rdquo] nonforested veg.

3) Chap 2.1.1 Connectivity (CON), (FW-CON-OBJ), pg 27

Issue: Insufficient Pace of Restoration of Connectivity under Obj 2. The backlog in the number of road stream

crossing which are currently impacting the movement of water and aquatic organisms, as well as the degradation these undersized crossings cause to downstream channel habitats, is sufficiently large across the LNF to warrant a higher level of restoration. The effects roads have on aquatic and riparian dependent species and ecological connectivity is well established in the research.

Recommendation: 1) Obj 2 should be increased in number of crossings removed or upgraded to a minimum of 30, or 6 per year during a 5 year period. 2) In addition, connectivity by definition involves the natural flow of physical processes such as water, not just species. Add Obj 3 which states, [ldquo]Forest roads and their fill material have interrupted natural flowpaths of runoff associated with snowmelt or overland flow, preventing it from reaching small forested wetlands, wet meadows or recharging shallow groundwater. Water is instead captured in ditchlines and routed to the nearest crossdrain culverts. Road fill will be modified to reconnect natural flowpaths and restore connectivity of forest hydrology. A minimum of 4 sites per year will have roads upgraded to provide restoration of natural flowpaths.

Issue: Additional Objective needed to address restoration of stream in-channel habitat structure and riparian vegetation following removal of barriers, both human-caused and road-stream crossing. Recommendation: Add Obj 04 [ndash] In conjunction with barrier removal, restoration shall include adding appropriately sized in-channel aquatic habitat substrate and large woody material structure for pool development and security cover, as well as plantings of riparian species for streambank shade, soil stability and macro-invertebrate species.

#### Watershed Restoration

I recommend that the Proposed Action address watershed restoration with a more comprehensively developed process which includes its own desired conditions, objectives and standards and guidelines. And that Watershed Restoration as an issue becomes integrated into all LNF projects and across Resource disciplines. Watershed restoration, specifically addressing watershed hydrologic and aquatic functions should become a driving issue in all LNF projects whether a project is considered primarily Timber, Fuels, Roads, Recreation, Range, Minerals or Special Uses. Besides the fact that our Forests were originally established in 1897 to [ldquo][hellip]secure favorable flows of water[rdquo], the current climate changes affecting forest hydrology in the Rocky Mountains will make our Forest watersheds much more important going forward as [ldquo]natural infrastructure[rdquo] critical in storing snowmelt and rainfall, and regulating runoff to support our rivers and streams. There is a lot that forest managers can do to improve watershed conditions at various scales and I would like to see Watershed Restoration developed within a viable Alternative for the Forest Plan.

I look forward to continued progress and applaud Supervisor Upton and staff for the transparency and efforts to date.

Respectfully,

1. [ldquo]maintain[rdquo] only applies under circumstances where condition are fully functioning and not currently impaired. [ldquo]restore[rdquo] applies to conditions which are currently impaired or outside the range of natural variation.