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Re: Lolo National Forest Land Management Plan Proposed Action

April 1, 2024

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?project=62960>.

Dear Ms. Milburn,

Thank you for the opportunity to comment on the Lolo National Forest Land Management Plan Proposed Action. To date, the Lolo National Forest (“the Forest”) has done a wonderful job involving the public in the planning process, and we look forward to working with you as the plan develops.

The Great Burn Conservation Alliance (GBCA) is a 53-year-old organization that works to foster the connection between people and place to further conservation and stewardship in the Great Burn ecosystem. Our mission area covers nearly 1.9 million acres, where we partner with the Lolo, Nez Perce-Clearwater, and Idaho Panhandle National Forests to maintain the wild character of the land. We are a longtime Lolo National Forest stewardship partner with hundreds of members who reside in Mineral and Missoula Counties. GBCA is deeply committed to and invested in this region.

Overall, we find that the Proposed Action reflects diligent planning and drafting. The Proposed Action describes a variety of measures that will ultimately benefit users, local communities, and the Forest itself. We find the document to be well-organized and readable. For example, the appendixes are relevant, and Appendix 11 is especially helpful for increasing public understanding.

We applaud the decision to maintain the size and protections for the Great Burn Recommended Wilderness Area. The Great Burn is a special landscape, and managing it for its wilderness values serves the broader public, local communities, and their interests of the Forest. While we have included below a number of suggested changes, the Proposed Action lays a strong foundation for the upcoming stages in the forest planning process.

I. Preliminary Issues

We believe that habitat connectivity deserves greater attention and should be treated as a “Preliminary Issue” as the term is used in the Proposed Action Scoping Letter¹. Further, we recommend that habitat connectivity should be a foundational element of all alternatives moving forward. The Scoping Letter acknowledges that connectivity is a “critical element of ecosystems and a distinctive role of the Lolo National Forest.”² This importance is also recognized in the Proposed Action. “Due to its landform and juxtaposition in the landscape, the Lolo plays a crucial role in providing habitat connectivity across western Montana between ecosystems and habitats for many species.”³ Habitat connectivity is important at every scale within this landscape. At the highest level, the Forest forms part of the Crown of the Continent Ecosystem. The Forest also links Interagency Grizzly Bear Recovery zones including the Northern Continental Divide, the Greater Yellowstone, the Cabinet-Yaak, and the Bitterroot. Within the Forest, landscapes such as the Great Burn provide refugia for wildlife and facilitate population movement and genetic exchange for important species such as mountain goat, grizzly bear, wolverine, and many more. Habitat connectivity should therefore be listed as a primary consideration in all planning decisions.

Despite the significance of connectivity to the Forest, and the important role the Forest plays in the broader landscape, connectivity is not listed as a Preliminary Issue. Connectivity is not adequately addressed by any of the other Preliminary Issues, although those issues may have direct ramifications on connectivity. We hope that the planning team will include connectivity as a Preliminary Issue and afford it the in-depth consideration it deserves.

II. Individual Issues

A. Recommended Wilderness Areas

The Proposed Action maintains the current boundaries for the Great Burn Recommended Wilderness Area (“the Great Burn”). The Lolo portions of the Great Burn form part of the Hoodoo Roadless Area, a 252,000-acre landscape that spans the Lolo and the adjacent Nez Perce-Clearwater National Forests (“the Nez Clear”). Both forests currently manage this area as recommended wilderness, and have done so for almost forty years. This landscape provides unparalleled opportunity for quiet recreation and habitat for species such as wolverine, mountain goats, and grizzly bear. The high-elevation areas in the Great Burn are ideal maternal denning habitat for wolverine. The superlative qualities of the Great Burn have led to its inclusion in sixteen wilderness bills. We fully support the planning team’s decision to recognize and maintain the boundaries of the Great Burn.

We recommend amending the Proposed Action to include recommended wilderness status for the Ward Eagle Roadless Area and Meadow Creek and Upper North Fork Roadless Area. The Ward Eagle Roadless Area is 8,570 acres and located west of St. Regis and encompasses popular backcountry destinations such as Hub and Hazel lakes. The area is geographically important to large landscape connectivity for grizzly bear and wolverine. It offers ideal habitat for elk, moose,

¹ Lolo National Forest, *Proposed Action Scoping Letter*, January 31, 2024, at 2.

² *Id.* at 5.

³ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 8.

pika, and other keystone species native to the Northern Bitterroot range. The roadless area also boasts mature cedar and hemlock stands.

The Meadow Creek-Upper North Fork Roadless Area includes almost 60,000 acres directly north of Hoodoo Pass. 7,200 acres of this IRA are located within the Forest. The area has 1,159 acres of modeled whitebark pine habitat and provides habitat for mountain goat, moose, and wolverine.

B. Key Linkage Areas

We recommend that the planning team adopt “Key Linkage Area” as a new Management Area (MA) designation to recognize and enhance the critical role that select landscapes play in habitat connectivity. Further, we recommend that the Forest adopt a new specific management direction to give meaning to this designation. Key Linkage Areas would serve as corridors between high-quality habitat found in Wilderness, recommended wilderness, inventoried roadless areas (IRA), backcountry, grizzly bear demographic connectivity areas, and other areas that provide secure wildlife habitat. In practice, Key Linkage Areas would act as pathways or stepping stones between large, secure habitat areas. Similar designations have been implemented in other forest planning processes, including the Coronado National Forest. Similarly, the Custer Gallatin National Forest created two Key Linkage Areas, totalling about 60,000 acres to facilitate wildlife movement between secure wildlife habitat areas.⁴

Identifying and implementing Key Linkage Areas requires a detailed geographic analysis of the habitat and connectivity in the Forest and in adjacent wildlands. The Proposed Action indicates that the Forest is conducting a modeling analysis to refine the connectivity components of the Proposed Action.⁵ The results of this exercise may provide the information necessary to identify important linkages between habitat areas. However, if this process cannot be completed in a timely fashion, we recommend that the planning team draw the necessary information from maps and data produced by Servheen et al.⁶ and *Sells.⁷ Each of these sources provide sufficient information for identifying Key Linkage Areas. A lack of information should not impede the development of this important MA.

We suggest the planning team implement the following Desired Conditions for the Key Linkage Area MA:

- Road densities and infrastructure improvements should remain at or below current (2024) levels.
- Habitat conditions in Key Linkage Areas should provide security and refuge from stressors and threats and meet species’ needs for feeding, breeding, sheltering, and moving.

⁴ The Center for Large Landscape Conservation, *Planning for Connectivity: A Guide to Connecting and Conserving Wildlife Within and Beyond America’s National Forests*, 2015, at 13-15.

⁵ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 27.

⁶ Chris Servheen et al., *Identification and Management of Linkage Zones for Wildlife between the Large Blocks of Public Land in the Northern Rocky Mountains*, U.S. Fish and Wildlife Service, July 2003.

⁷ Sarah N. Sells, et al. *Predicted Connectivity Pathways Between Grizzly Bear Ecosystems in Western Montana*, *Biological Conservation* 284, 110199, Aug. 2023.

- Human disturbance should not limit or impede habitat connectivity.
- Habitat should provide connectivity for wide-ranging carnivores and ungulates.
- To the greatest extent possible, wildlife and fish should not be subjected to harassment and human disturbance at a scale that could impact vital functions (e.g., seasonal and daily movements, breeding, feeding, and rearing young).

We suggest the planning team implement the following items as Standards or Guidelines for the Key Linkage Area MA:

- Vegetation management activities must include design features to maintain, enhance or restore habitat connectivity.
- The Forest will design and schedule any vegetation treatments in a manner that does not impede movements and use for targeted species. The Forest should achieve this through means such as staging the timing of timber management activities, using temporary road closures, and limiting the size of the area being treated.
- Mechanized access will not increase. Year-round mechanized travel will be restricted to designated routes.
- Additions to the current designated system of roads for public access is prohibited.
- Temporary roads that support ecosystem restoration activities, fuels management, or other short-term projects must be closed and rehabilitated immediately upon project completion to protect watershed condition, minimize wildlife disturbance, and prevent illegal motorized use.
- New or reconstructed fencing must allow for wildlife passage, except where specifically intended to exclude wildlife (e.g. funnel fencing to direct animals to crossing areas) or to protect human health and safety.

C. Petty Creek and the Middle Clark Fork GA

The Petty Creek drainage and the entirety of the Middle Clark Fork GA provide critical connectivity between the Ninemile Demographic Connectivity Area (“DCA”) and quality habitat south of I-90, namely the Great Burn. Connecting the DCA to the Great Burn and other roadless areas will enhance the habitat potential in the Lolo and should be recognized in the Proposed Action.

Management in the Petty Creek drainage and Middle Clark Fork Geographic Area (“GA) should emphasize wildlife connectivity between the Ninemile DCA and the Great Burn, helping to connect the Northern Continental Divide and Bitterroot ecosystems. The most feasible and effective means to ensure that this area functions as a connective corridor is to manage this landscape as a Key Linkage Area, as described above. This Key Linkage Area would promote connectivity for wide-ranging carnivores and ungulates. In addition, any blocks of acquired land restoration emphasis areas in and around the Petty Creek drainage should have wildlife connectivity as a desired condition and restoration goal.

The Ninemile DCA is intended to support female grizzly occupancy and eventual dispersal to the Cabinet-Yaak and Bitterroot ecosystems. The Ninemile DCA currently comprises approximately 25% of the Middle Clark Fork GA. In addition, the Fish Creek Wildlife Management Area (WMA) covers 35,317 acres in the Fish Creek drainage, with additional acreage on the north side

of the Clark Fork River. The entire WMA is in the Middle Clark Fork GA and is “primarily dedicated to the protection and perpetuation of fish and wildlife resources.”⁸ Further, “[t]he WMA constitutes the largest portion of the Fish Creek project area, which corresponds with the large and connected landscapes needed to support wild, intact fish and wildlife populations. The WMA remains in its primitive condition to maximize wildlife use on the land.”⁹

Therefore, we strongly recommend that the Middle Clark Fork GA, and the Petty Creek drainage be managed as a Key Linkage Area to promote connectivity. Our recommendation for Desired Conditions, Standards, and Guidelines are described above. Designating these landscapes as a Key Linkage Area would in no way detract from additional habitat connectivity planning and management across the remainder of the Forest.

D. Grizzly Bear

The U.S. Fish and Wildlife Service (USFWS) categorizes significant portions of the Forest as potential habitat for grizzly bear, a species listed since 1975 as threatened under the Endangered Species Act.¹⁰ While the Proposed Action provides some important protections and considerations for grizzly bear, we have identified several topics in need of consideration and amendment.

First, the Proposed Action does not include a connectivity map or geographic assessment for grizzly bear. While the Forest Service has stated that such a map is in development, satisfactory alternatives already exist. If the Forest Service is not able to timely produce a map, we recommend that the Proposed Action be amended to use maps by either Servheen et al.¹¹ or Sarah Sells et al.¹² Both sources can provide the relevant data necessary for making informed decisions regarding grizzly bear habitat and connectivity.

Second, we recommend that the “Distinctive Roles by Geographic Area” for the Ninemile/Petty Creek GA be amended. The current language indicates that the primary goal of the Ninemile DCA is to facilitate the “eventual dispersal” of grizzly bear.¹³ This language should be adjusted to better represent the current benefits of the DCA and the fact that bears have already dispersed. Further, this information should be added in the “Distinctive Roles by Geographic Area” for the Middle Clark Fork GA.

Finally, the Proposed Action should include components that mandate collaboration with the USFWS regarding the reintroduction of grizzly bear into the Bitterroot Ecosystem. As part of the Grizzly Recovery Program, USFWS has designated six recovery zones throughout the Northwest, including the Bitterroot Ecosystem Recovery Zone.¹⁴ Although grizzly bear are not currently managed as permanent residents of this area, their frequent presence is widely

⁸ Montana Fish Wildlife and Parks, *Fish Creek Draft Recreation Strategy*, Sept. 2023, at 20.

⁹ *Id.* at 18.

¹⁰ 50 C.F.R. § 17.11.

¹¹ Chris Servheen et al., *Identification and Management of Linkage Zones for Wildlife between the Large Blocks of Public Land in the Northern Rocky Mountains*, U.S. Fish and Wildlife Service, July 2003.

¹² Sarah N. Sells, et al. *Predicted Connectivity Pathways Between Grizzly Bear Ecosystems in Western Montana*, *Biological Conservation* 284, 110199, Aug. 2023.

¹³ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 139.

¹⁴ U.S. Fish and Wildlife Service, *Grizzly Bear Recovery Program: 2022 Annual Report*, 2022, at 12.

acknowledged.¹⁵ Individual bears migrate into and out of the Bitterroot Ecosystem. Further, the USFWS is now engaged in a court-mandated process to reassess management actions for grizzly bear in the Bitterroot Ecosystem.¹⁶ As populations increase in the nearby Northern Continental Divide Ecosystem, grizzly bear are increasingly likely to wander and reestablish a more permanent presence in the Bitterroot Ecosystem and adjacent areas.¹⁷ We therefore recommend that the Proposed Action be updated to better reflect the presence of bears in this landscape and to mandate that the Forest Service work directly with the Fish and Wildlife Service to enhance the viability of a permanent population of resident bears in the Bitterroot Ecosystem.

E. Recreation

We appreciate the measures in the Proposed Action that minimize the impacts of mechanized and motorized recreation. Similarly, we appreciate the Planning Team's work to ensure opportunities for quiet recreation in wild landscapes. In particular, we support the decision prohibiting mechanized and motorized recreation in recommended wilderness. We also recognize the challenge of balancing the needs of different user groups. Several areas of the Proposed Action can be clarified and improved.

First, the Proposed Action does not sufficiently identify unauthorized off-road motorized recreation as an ecosystem stressor. Motorized trespass causes a wide range of management challenges and ecosystem issues, including vegetation impacts; soil disturbance and compaction leading to erosion; increased fragmentation to and impacts on wildlife and wildlife habitat; introduction of invasive weeds; and increased potential for human-caused wildfires from hot engines and tailpipes. Unauthorized use is well-documented across the Forest. Our organization has employed a backcountry ranger to patrol the Great Burn and surrounding roadless areas for nearly twenty years. A wide range of illegal trespass issues have been documented by our staff, including:

- Illegal snowmobiling in the Heart Lake basin and Stateline in Superior Ranger District;
- Illegal snowmobiling in the Schley trailhead area in Irish Basin and Kid Lake (Nez Clear) in Ninemile Ranger District;
- Illegal motorcycle use on closed trails near Pilot Knob in Missoula Ranger District;
- Illegal OHV use on the White Mountain Divide in Missoula and Ninemile Ranger Districts; and,
- Illegal mechanized use on the Stateline Trail in Superior and Ninemile Ranger Districts.

We therefore request that the Proposed Action be updated to broadly recognize the threat of unauthorized off-road recreation. We also specifically recommend that the Proposed Action include provisions for robust monitoring of illegal use and road closure violations. Data

¹⁵ *Id.* at 12-13.

¹⁶ *Alliance for Wild Rockies v. Cooley*, No. CV 21-136-M-DWM, 2023 WL 2522945, at 12 (D. Mont. Mar. 14, 2023).

¹⁷ U.S. Fish and Wildlife Service, *Grizzly Bear Recovery Program: 2022 Annual Report*, 2022, at 12.

concerning reported violations per year should be utilized as a relevant indicator for both aquatic and terrestrial ecosystem health.

Second, the Stateline Trail #738 presents unique recreational opportunities and management challenges. In general, we recommend that the trail be managed so that use in the sections in recommended wilderness areas is limited to non-mechanized travel. Currently, the description of the trail on page 135 of the Proposed Action gives the impression that motorized recreation is allowed on the entirety of the trail. This is inaccurate. We recommend amending any language giving that impression.

Mechanized recreation should not take priority over existing recommended wilderness. The Final Environmental Impact Statement for the adjacent Nez Perce-Clearwater National Forest Plan proposes removing from recommended wilderness area a 150-foot corridor along much of the Stateline Trail.¹⁸ We have strenuously objected to the Nez-Clear's approach, and now urge the Lolo to maintain the boundaries for the Great Burn Recommended Wilderness Area set out in the Proposed Action. If implemented, the Nez-Clear's corridor will have major, harmful effects on habitat connectivity, and will invite trespass and illegal use in adjacent recommended wilderness. Once mountain bikes are legally allowed access to the Stateline Trail through the Great Burn, there is no reason to expect that users will limit their travel to the 150-corridor. Instead, both forests should expect to find trespass and illegal use on spurs and connecting trails. Altering the recommended wilderness boundaries would provide minimal benefit at a significant ecological cost.

If implemented, the Nez-Clear's decision to invite mechanized users onto those portions of the Stateline Trail that cross the Great Burn will also have negative impacts on the safety and enjoyment of other user groups. This section of trail has many blind corners, significant exposure, and steep terrain with limited sightlines. Horsepackers and hikers would be put in danger simply by having to share this narrow trail with mechanized users. Currently, this landscape meets all the criteria for recommended wilderness. There is no reason the Forest Service should jeopardize the many positive characteristics of this wild landscape for recreation that is better suited to other areas of the Forest. Therefore, we recommend that the planning team maintain the recommended wilderness boundaries in the Proposed Action.

F. Wolverine

The USFWS recently listed wolverine as a threatened species under the Endangered Species Act. The Forest provides important habitat for this species. In particular, the Great Burn offers important, high-elevation habitat, which is critically important for maternal denning. Despite the wolverine's threatened status and the significance of the Forest to wolverine, the Proposed Action includes just one plan component related to wolverine, FW-WRISK-DC 07.¹⁹ Given that

¹⁸ Nez Perce-Clearwater National Forests, *Final Environmental Impact Statement for the Land Management Plan*, Nov. 2023.

¹⁹ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 45 (“Suitable wolverine material habitat is widely dispersed throughout the forest and includes locations with limited disturbance from winter recreation.”).

the listing decision only recently occurred, we expect that the planning team will take care to incorporate more Standards that offer protection and ensure suitable habitat for wolverine.

We encourage the planning team to utilize recommended wilderness as a tool to protect wolverine habitat. Heinemeyer et al. found that wolverines avoided areas of both motorized and non-motorized winter recreation with off-road recreation eliciting a stronger response than road-based recreation. Moreover, female wolverines exhibited stronger avoidance of off-road motorized recreation and experienced higher indirect habitat loss than male wolverines.²⁰ The wolverine listing indicates that “[i]ncreased human development, infrastructure, and associated anthropogenic disturbance are expected to have direct and indirect effects to wolverine populations in the contiguous United States, including reducing the number of wolverines that can be supported by available habitat, reducing the ability of wolverines to travel between patches of suitable habitat”²¹ While critical habitat designations have not yet been made for the species, the Great Burn is both primary wolverine habitat and a predicted high use corridor making it likely that the Great Burn will be designated as wolverine critical habitat within the year. In 2014, FWP documented one and possibly two wolverines on the Heart Lake Trail and in 2019 documented another in the North Fork of Fish Creek – both photo documented in the Great Burn recommended wilderness. Given its importance to the species, the wilderness character of the Great Burn and similar landscapes should be protected to promote wolverine recovery.

G. Mountain Goats

We support the decision to include mountain goats as a species of conservation concern. This decision is consistent with current knowledge of the species and recognizes the Forest’s role in reversing population decline.

Mountain goats are one of the lesser-studied large mammals in North America and have no close relatives in the New World. In Montana, the status of these iconic mammals is complex. In the western part of the state, native mountain goat herds persist and are relatively stable.

At the same time, their numbers have declined steeply, especially outside Glacier National Park. East of the Continental Divide, goat populations are largely introduced. For this reason, we believe that mountain goats in the Forest should qualify for consideration as a “local conservation concern due to . . . declining trends in population.”²²

A synthesis of management data produced in 2017 by Montana Fish Wildlife and Parks (FWP) estimated there were about 1,160 native mountain goats outside of national parks in Montana. Many of the populations are small and isolated demographically and genetically.

Small bands of mountain goats persist in the Great Burn. The largest herd frequents popular hiking destinations around Heart, Pearl and Dalton Lakes on the stateline. According to FWP, this herd’s number is fairly stable at approximately 40-50 animals. Many of these have, to some extent, become habituated to humans. One of the most sensitive locations is Pebble Creek in the

²⁰ Kimberly Heinemeyer et al., *Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation*, *Ecosphere* 10(2), 2019, (Appendix E).

²¹ 88 F.R. 83726, 83762.

²² Forest Service Handbook 1909.12, chapter 10, section 12.52.

Cache Creek drainage of Montana, which contains high quality goat habitat but is vulnerable to human overuse.

Reliable information on population status and trends of mountain goats is logistically difficult to collect. We operate a summer monitoring program that has, for several summers, provided valuable information on resident goat populations to state wildlife managers.

A survey of wildlife biologists in the synthesis of management data noted above indicated that ORV/snowmobile use is a significant threat to the viability of small bands of mountain goats. Snowmobile use on the ridge of the Stateline Trail in the Great Burn may threaten the goats. Winter motorized use is one of the chief threats to the ecology of the Great Burn overall, and we have aggressively fought illegal and inappropriate snowmobile activity in our mission area for many years.

To ensure that the presence of mountain goats on the landscape is accurately reflected, we request that the text describing “Ecological Roles and Contributions” of the Ninemile/Petty Creek GA be amended.²³ Specifically, the following text should be added “One of the largest all-native mountain goat herds in the U.S. can be found in the Great Burn on this GA.”²⁴ This text is found in the “Ecological Roles and Contributions” for the Middle Clark Fork GA. The goats in question occupy both GAs. Amending the Proposed Alternative to include that information for both GAs will better reflect the facts on the ground.

H. Pileated Woodpecker and Large Trees

We recommend that the Proposed Action be amended to include pileated woodpecker as a focal species as a means to protect and increase large and very large trees.

The draft assessment finds the number of very large trees (>20”) is well below the natural range of variability (NRV) and that of large trees (>15-20”) is on the lower end. Selective logging that targeted the largest trees for removal and suppression of fires has encouraged a proliferation of small-diameter trees. In some areas, sites that once held 50 to 150 large trees can now have over 1,000 smaller trees.

Large and very large trees are essential components of a healthy forest. As the draft assessment states, even if they are not necessarily “old,” large-diameter trees are uniquely valuable ecologically, as they contribute to recovery after disturbance and provide important wildlife habitat both as live trees and as dead snags. For forest visitors, they also provide abundant value outside of their ecological attributes, contributing to aesthetic, symbolic, cultural, and spiritual values.

Because large trees and snags are so important to a healthy forested ecosystem, and because they are less abundant than the NRV, the Forest should take actions to increase them. The pileated woodpecker should be a focal species to monitor the effectiveness of these actions. Only large-diameter trees have enough girth for a nest. The pileated woodpeckers’ abandoned nest cavities are used by a variety of birds and mammals for nesting and roosting. The Forest should

²³ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 136.

²⁴ *Id.* at 139.

also safeguard recommended wilderness areas, where natural processes have been allowed large trees and snags to maintain their abundance.

I. Beaver

The Lolo National Forest has been a leader in collaborative research to understand historical beaver habitat and suitability for beaver restoration to benefit aquatic and riparian habitat and to build landscape resilience to climate change. In general, we appreciate much of the Proposed Action's directives related to Beaver. We have included below specific statements regarding components, information, and language from the Proposed Action.

1. Watershed (WTR)

a. FW-WTR-GDL-02

We support this component: "To protect the ecosystem services provided by beaver ecosystem engineering, management activities should not remove or otherwise alter beaver dams, except to protect critical infrastructure and public safety, or where necessary to support the management of at-risk species."

We request this additional language be added to this component: "Where conflicts with beaver habitat and roads and other human development arise in a watershed, resolution will be addressed through management strategies such as pond levelers, fencing, and other non-lethal strategies. Lethal removal will only be considered after non-lethal strategy options have been exhausted."

2. Riparian Management Zones and Ecosystems (RMZ)

We appreciate the introductory language emphasizing the key role that beavers play in restoring ecological integrity in riparian areas and valley bottoms, including the note that RMZs are *not* "no management zones." We support ecologically based restoration in these critically important habitats.

a. FW-RMZ-OBJ-02

We support this component: "Implement beaver habitat restoration actions in at least two watersheds every 5 years."

However, we request that the Forest could pursue a more ambitious objective by working in collaboration with outside partners such as the Clark Fork Coalition, Trout Unlimited, National Wildlife Federation, and local watershed groups, all of whom are securing resources and actively implementing process-based restoration initiatives on and adjacent to Forest lands.

3. Recreation (REC)

a. FW-REC-GDL-05

We support this component: "To reduce potential adverse effects to water quality and aquatic resources, construction of new facilities or infrastructure within floodplains should be avoided. Where new activities inherently must occur in riparian management zones (e.g., at road and trail stream crossings, boat ramps, or docks), they should be located and designed to minimize

adverse effects to floodplains and other riparian-dependent resource conditions (e.g., within geologically stable areas and avoiding major spawning areas).”

However, we request this additional language be added: “Where conflicts with beaver habitat and development associated with recreation arise, resolution will be addressed through management strategies such as pond levelers, fencing, and other non-lethal strategies. Lethal removal will only be considered after non-lethal strategy options have been exhausted.”

4. Infrastructure (INF)

We request an additional Guideline with this language: “Where conflicts with beaver habitat and roads and other human development arise, resolution will be addressed through management strategies such as pond levelers, fencing, and other non-lethal strategies. Lethal removal will only be considered after non-lethal strategy options have been exhausted.”

a. FW-INF-STD-04

We support this component: “Newly constructed or reconstructed roads shall not encroach into streams and riparian management zones if this action increases the net long-term negative effect to the aquatic ecosystem, including impacts to the floodplain function and geometry.”

However, we request this additional language be added: “Where conflicts with beaver habitat and roads and other human development arise, resolution will be addressed through management strategies such as pond levelers, fencing, and other non-lethal strategies. Lethal removal will only be considered after non-lethal strategy options have been exhausted.”

b. FW-INF-GDL-08

We support this component: “To reduce the risk of road-related sediment to the aquatic ecosystem, new, replacement, and reconstructed stream crossing sites, such as culverts, bridges, and other permanent stream crossings, should be designed to prevent diversion of stream flow out of the channel and down the road in the event the crossing is plugged or has a flow that exceeds 100-year event.”

However, we request the following additional language: “Where conflicts with beaver habitat and roads and other human development arise, resolution will be addressed through management strategies such as pond levelers, fencing, and other non-lethal strategies. Lethal removal will only be considered after non-lethal strategy options have been exhausted.”

5. Focal Species (5.2.1.)

This appears to be an incomplete section at this stage of planning.²⁵ Because of its value as an ecosystem driver (and consistent with other sections in the Proposed Action and analysis in the Assessment), we urge the Forest to select beaver as a focal species, as well as an indicator for watershed health, water resources, and aquatic ecosystems in the monitoring strategy. The Rio Grande National Forest in Colorado made such a selection in its forest plan revision and is implementing the plan with headwaters restoration activities to improve beaver habitat and expand beaver distribution for all the ecosystem services listed in the draft assessment.²⁶

²⁵ Lolo National Forest, *Proposed Action: Lolo National Forest Land Management Plan*, Jan. 2024, at 162.

²⁶ See, e.g., Rio Grande Headwaters Restoration Project, <https://riograndeheadwaters.org/wet-meadows-restoration>.

Beavers provide an excellent indicator of ecological integrity and watershed health, and therefore are an appropriate focal species in this context. Focal species are to be “selected on the basis of their functional role in ecosystems.”²⁷ As noted in the 2012 Planning Rule and discussed by the 2012 Planning Rule Committee of Scientists, further criteria for selecting focal species include “the species’ functional roles in the ecosystem and sensitivity to changing conditions, management activities, particular threats, or desired ecological conditions.”²⁸ As an ecosystem engineer, the beaver clearly fits this definition.

For example, in naming beaver as a focal species in its Forest Plan, the Rio Grande National Forest stated that beaver presence is “complementary” to other goals and desired conditions including gathering “information on trends in sedimentation, streamflow, riparian cover, and stream temperature [which] are all particularly relevant for the management and conservation of many aquatic and riparian species of conservation concern.”²⁹ The Rio Grande National Forest Final Plan proposes monitoring the number of subwatersheds (6th level or 12-digit Hydrologic Unit Code) with beaver activity over time, noting: “This is a cost-effective strategy that allows the Forest to track beaver presence and range expansion, identify potential areas where beaver introduction may be appropriate, and provide opportunities for citizen science and outreach.”³⁰

J. Fire Management Plan

We recommend that the Proposed Action be amended to include a Standard that the Forest complete an updated Fire Management Plan (FMP) every five years. The 2024 Interagency Standards for Fire and Fire Aviation Operations states that “[e]very area with burnable vegetation must have an approved [FMP]. FMPs are strategic plans that define a program to manage wildland fires based on the area’s approved land management plan.”³¹ Accordingly, the Forest will be required to prepare an FMP. By revisiting this document every five years, the Forest will ensure that the FMP reflects both the best available science and benefits the forest overall. The FMP should be used as a key tool to implement or meet Desired Conditions, such as FW-FFW-DC-01. “The full range of fire management activities are recognized by forest administrators as an integral part of achieving ecosystem sustainability and are used to contribute to the interrelated desired conditions of ecosystem sustainability, species diversity, protection of property and other high-value resources, and public safety.”³² Our recommended standard therefore reads as follows:

FW-FFW-STD-02

Forest administrators will collaborate with other relevant agencies to draft and implement a new fire management plan at least once every five years. Any fire plan must reflect the best available science.

K. Whitebark Pine

²⁷ 36 CFR § 219.19.

²⁸ 77 FR 21162-02.

²⁹ Rio Grande National Forest, *Land Management Plan*, May 2020, at 90.

³⁰ *Id.*

³¹ National Interagency Fire Center, *Interagency Standards for Fire and Fire Aviation Operations*, Jan. 2024, at 131.

³² Lolo National Forest, *Proposed Action Scoping Letter*, January 31, 2024, at 29.

In general, we support the Proposed Action's attention to whitebark pine and the protections it affords the species. The Forest and many of the IRAs along the Idaho/Montana stateline provide important habitat for whitebark pine, a recently listed threatened species. Whitebark pine is susceptible to a number of stressors and threats stemming from habitat loss, climate change, and particular forms of recreation. Specifically, whitebark pine is susceptible to physical harm from OSV use.

While blister rust constitutes the most significant discrete threat to the species, the USFWS's listing decision also highlights the role of "cumulative interactions between white pine blister rust and other stressors" may play in seed loss and species decline.³³ OSV use poses a particular threat to trees.³⁴ The listing decision for whitebark pine indicates recreation can harm trees. "There are numerous other factors that operate on whitebark pine at more local scales, affecting individuals or local areas; these include, but are not limited to, agriculture; energy production and mining; biological resource use (*e.g.*, logging); and recreation."³⁵

The Great Burn and other high elevation IRAs in the Lolo provide large areas of habitat for whitebark pine. Maintaining prohibitions against motorized recreation in these sensitive areas helps to protect the whitebark pine.

We recommend that plan components for the Middle Clark Fork GA be amended to specifically include protections for whitebark pine. Doing so will help promote ecosystem health and connectivity.

L. Wild and Scenic Rivers

We appreciate the Forest recognizing long standing eligibility of Cache Creek (and associated tributaries listed in the 1996 Suitability Study) and the West Fork Fish Creek within the Great Burn ecosystem. However, Fish Creek (and associated segments) and the South Fork of Fish Creek are crucial for connectivity to the Clark Fork River and serve as vital cold-water refugia within the Great Burn ecosystem. Therefore, these streams merit eligibility consideration.

III. Corrections and Clarifications

In reviewing the Proposed Action we have noted a number of inconsistencies, errors, or other issues with language and information. We have noted these issues below and provided suggested corrections.

- Location of Fish Creek
 - Issue: Sections 3.6.1 and 3.6.8 of the Proposed Action relate to the Ninemile/Petty Creek GA. These sections contain information related to the Fish Creek Area. These references occur on pages 139, 140, and 141.

³³ 87 F.R. 76882, 76895.

³⁴ See Winter Wildlands Alliance, *Seeing the Forest and the Trees: Assessing Snowmobile Tree Damage in National Forests*, 2009. (Appendix K).

³⁵ 87 F.R. 76882, 76886.

- Correction: The Fish Creek area is predominantly located in the Middle Clark Fork GA, and this information would be better represented in that portion of the Proposed Action.
- Appendix 2, Table A2.3
 - Issue: Table A2.3 is found on page A2-3 of the Appendices. In the row labeled “Wheeled Motor Vehicles,” at column “IRA” there is a “Y,” indicating Wheeled Motor Vehicles are suitable.
 - Correction: “Y/N” is the more appropriate information for this cell. This would make the information consistent with other cells in this row.
- Appendix 9, Standards
 - Issue: In Section 1.6.1, Standard 06 uses the phrase “NCDE primary conservation area and zone.” Guideline 02 from the same section uses the same phrase. These phrases are found on page A9-8 and A9-10.
 - Correction: “[Z]one” should be amended to “zone 1” to maintain consistency throughout this section.
- FW-ROS-STD
 - Issue: Standards 02 and 04 from this section address desired semi-primitive nonmotorized settings. These Standards are found on page 62 of the Proposed Action.
 - Clarification: We request that these Standards be reworded to provide better clarity. In addition, we request greater specificity for Standard 04.
- Spelling of “Heart Lake”
 - Issue: Section 3.5.8 refers to “Hart Lake.” This reference is on page 137 of the Proposed Action.
 - Correction: “Heart Lake” is the accepted spelling of this water body.
- Capitalization of “Hoodoo Pass”
 - Issue: Section 3.5.8 refers to “HooDoo Pass.” This reference is on page 137 of the Proposed Action.
 - Correction: This geographic feature is generally capitalized as “Hoodoo Pass.”

IV. Conclusion

We appreciate the opportunity to comment on the Proposed Action. Thank you for considering the issues we have raised. We look forward to participating in future steps in the forest plan revision process. Please let us know if you have any questions regarding the comments we have provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Hayley Newman", with a long horizontal line extending to the right.

Hayley Newman
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