



May 15, 2023

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Lolo National Forest Supervisor's Office  
c/o Amanda Milburn, Plan Revision  
24 Fort Missoula Rd.  
Missoula, MT 59804

Submitted via email to: [SM.FS.LFNRevision@usda.gov](mailto:SM.FS.LFNRevision@usda.gov)

***Re: Lolo National Forest Plan Revision/Comments on the Wilderness and Wild & Scenic Rivers Inventories.***

Dear Ms. Milburn,

Thank you for the opportunity to submit a comment on the Wilderness and Wild & Scenic River Inventories. Footloose Montana is a Missoula-based organization that is dedicated to the protection of wildlife, including carnivores such as grizzly bears and their habitat.

The Lolo National Forest is extremely important for grizzly bear recovery and as a corridor that helps grizzly bears to move between ecosystems in the north and the south. It encompasses parts of three Grizzly Bear Recovery Areas—the Ninemile Demographic Connectivity Area and other connectivity habitat for grizzly bears, including the Northern Bitterroot Mountains, the Sawmill-Petty area, and the Sapphire Mountains. Also, the Ninemile Demographic Connectivity Area is the only area that can connect the NCDE, Cabinet-Yaak, and Bitterroot Grizzly Bear Recovery Zones. As such, it is indispensable in helping mitigate the risk of extinction to the species by providing demographic and genetic aid.

We recognize the value of connectivity as an essential element of thriving grizzly bears in Montana, and strongly support an increase of all areas identified for wilderness classification by the Citizen Initiative. In addition, we recommend the inclusion of all 28 rivers found to be suitable for Wild & Scenic classification in the American Rivers Analysis

### **For the Wilderness Inventory:**

- Apply connectivity as an Outstandingly Remarkable Value.
- Include all roadless areas, particularly those under 5000 acres. These are vital as secure habitat for grizzly bears and other wildlife and for connectivity.
- Include areas with past disturbance that is now considered "substantially unnoticeable." These areas are critical to connectivity and will become entirely unnoticeable over the life of the forest plan process as long as they remain undisturbed.
- Include Mature and Old Growth Forest as an Outstandingly Remarkable Value.
- Include Grizzly Bear Denning Habitat as an Outstandingly Remarkable Value.

As most denning habitat are in roadless areas (Bader and Sieracki 2022), this essential part of the demographic connectivity model should be considered in the inventory process.

- Include all areas recommended for Wilderness classification by the Citizen Alternative.

### **For the Wild & Scenic River Inventory:**

- Apply the Climate Shield data as an Outstandingly Remarkable Value.
- Include all rivers recommended for Wild & Scenic in the Citizen alternative.
- Apply bull trout and cutthroat trout presence and designated Bull Trout Critical Habitat as Outstandingly Remarkable Resource Values.
- Include all rivers found to be suitable for Wild & Scenic classification in the 1991 Lolo National Forest Plan Amendment 12 assessment.

Thank you for your consideration.

Sincerely,

Anja Heister, PhD on behalf of the Footloose Montana Board

### **Literature cited:**

Bader M. and P. Sieracki. 2022. "Grizzly bear denning habitat and demographic connectivity in northern Idaho and western Montana." *Northwestern Naturalist* 103(3):209-225.