



Summary of Public Comments

Draft Wild and Scenic Rivers Inventory, Draft Wild and Scenic Rivers Evaluation Framework, and Draft Wilderness Inventory

1. Comment Period Summary

A comment period opportunity on the draft wild and scenic rivers inventory, the draft evaluation framework for wild and scenic river eligibility, and the draft wilderness inventory was provided from April 17 through May 16, 2023. The initial comment period was scheduled for 2 weeks. However, in response to public requests, the comment period was extended to 30 days.

The comment period was advertised with press releases (3/29/2023 and 4/14/2023), GovDelivery email announcements (3/16/2023, 4/1/2023, 4/10/2023, 4/17/2023, and 5/1/2023), social media posts, and on the Web Hub. The commenting tools provided included the online content analysis and response platform (CARA), online Talking Points Collaborative Maps, hardcopy mailings, and submissions to the Plan Revision email inbox (SM.FS.LNFRevision@usda.gov).

Review materials were posted to the Web Hub ahead of the comment period shortly after the public workshops on each topic. Workshops on the wild and scenic rivers inventory and draft evaluation framework were held in March 2023 and workshops on the draft wilderness inventory in April 2023. Three online workshops were held for the draft wild and scenic rivers inventory and evaluation framework and 3 in-person opportunities, and one online workshop were provided (Missoula, Paradise, and Seeley Lake or Greenough) for the draft wilderness inventory.

Approximately 130 comments were received in total. Some of these comments were duplicated across commenting platforms. The number of comments received were distributed across the available commenting platforms as follows:

- CARA: 81 unique comments were received through CARA, some of which were from the same individual but containing unique content.
- Talking Points Collaborative Map: 23 unique comments were received on the draft wilderness inventory portion; no comments were received on the wild and scenic rivers map.
- Email submissions: 23 emails with comments were received, several of which were duplicated in the CARA platform.
- Hardcopy letters: 3 hardcopy letters were received in the mail, two of which were duplicated on the CARA platform.

Approximately 23% of the comments covered both wild and scenic rivers and wilderness topics. 7% focused solely on wild and scenic rivers and 57% focused solely on wilderness. 13% commented on broader or more general topics of the plan revision.

2. Summary of Themes

A broad range of comments and perspectives were received during the comment period. We reviewed each comment and highlighted key themes expressed. Many comments contained multiple themes and issues.

Some comments included input related to topics related to other phases or elements of the plan revision process. For example, we heard interests in supporting livestock grazing on the Forest. We also received comments that touched broadly on how the revised plan should provide for a range of recreation opportunities and reduce user conflicts. We heard perspectives related to motorized uses such as snowmobiles and other off-highway vehicles, as well as mountain biking and e-bikes, horseback riding, hiking, and cross-country skiing not specifically tied to the wild and scenic rivers or wilderness processes.

We also received many comments that provided either broad or site-specific input and recommendations for the draft wild and scenic rivers and wilderness inventories as well as input relevant to the upcoming evaluation and recommendation phases of these processes. The following sections summarize the themes that emerged from these comments, and a summary of the USFS response to this input.

2.1 Theme 1: General Perspectives on Wild and Scenic Rivers and Recommended Wilderness Designations

Broad perspectives and preferences were shared with respect to the identification of rivers eligible as wild and scenic rivers, and lands that could become recommended wilderness areas.

Multiple comments expressed a general desire and appreciation for the identification of wild and scenic rivers, wilderness areas, or both. Rationale for this support included perspectives on ecosystem or species benefits, habitat, generalized support for unroaded and natural landscapes, and the provision of nonmotorized recreation opportunities. Several comments pointed to proposed legislation (Blackfoot Clearwater Stewardship Act and Northern Rockies Ecosystem Protection Act) as part of the rationale for supporting the inclusion either broadly or of specific locations as eligible wild and scenic rivers or recommended wilderness. The President's goal of conserving 30% of public lands was also cited.

Conversely, multiple comments expressed either caution or broadly did not support the potential for these administrative designations because of concerns about inhibiting necessary vegetation management actions on the landscape and associated economic and ecosystem impacts. Some commenters pointed to concerns about wildfire risk and forest health in unmanaged landscapes, and some cited the Montana Forest Action Plan and the Healthy Forest Restoration Act. Other commenters also expressed either caution or a lack of support, either broadly or site-specifically, based on concerns about limiting or excluding motorized recreation opportunities, access and accessibility including for disabled persons, and associated economic impacts to communities. Some shared the observation that they felt the few (or no) streams identified in the inventory have outstandingly remarkable values.

We also received comments that expressed a broad desire to support motorized and mechanized activities, including but not limited to snowmobiling and off-highway vehicle use, e-bikes, and mountain biking, and therefore were unsupportive of potential wilderness recommendations either broadly or in site-specific areas. Other comments expressed broad support for non-motorized uses and were in favor of more landscapes without motorized and mechanized uses. Some expressed a desire for mechanized use but not motorized and vice versa.

2.1.1 USFS Response to Theme 1

These perspectives and tradeoffs are important, and will be further considered during the evaluation, analysis, and recommendation phases of these processes. This theme of comments will not generally result in modifications to the broad inventories presented for comment, but the USFS will continue to evaluate and invite dialogue on these concerns and perspectives.

2.2 Theme 2: Process and Information Used

The second theme identified were those related to the process and information used to develop the draft inventories.

Several comments provided literature publications as best available scientific information for the USFS to consider. In addition, multiple comments pointed toward adopting the Citizen Alternative Forest Plan developed by the Flathead, Lolo, and Bitterroot Citizen Task Force. Several comments requested that the findings presented in the American Rivers Eligibility Study be adopted in the Lolo's inventory and evaluation process.

Concerns were also raised about the accuracy of the GIS data used to inform the inventory.

In addition, some commenters felt that the USFS misinterpreted or misapplied law, regulation, or policy with respect to these processes. Examples of these concerns and perspectives include:

- Only “rivers” should be included in the wild and scenic rivers inventory.
- Stream segments with pollution or impoundments were improperly included in the wild and scenic rivers inventory.
- No lands affected by wildfire suppression or previous management should be included in the wilderness inventory.
- Areas with vegetation management that are anticipated to visually recover during the life of the plan should be included in the wilderness inventory.
- All areas with maintenance level 2 roads should be excluded from the wilderness inventory.
- Motorized trails should not be excluded from the wilderness inventory.
- The 5,000-acre size criteria is too limiting for the wilderness inventory.
- The inventory processes did not adequately consider outstanding mineral deeds and rights and private property rights.

2.2.1 USFS Response to Theme 2

The scientific citations and publications included in comments, as well as the Citizen Alternative Forest Plan and the American Rivers study will be considered and added to the review of information in the project record. Much of this information is likely primarily relevant during the evaluation, analysis, and recommendation phases of these processes. The team will also review the planning directives, available data, and process papers with respect to each of the concerns related to the interpretation of law, regulation, and policy. It is possible that this review may result in some refinements to the inventories used for the evaluation phase.

2.3 Theme 3: Specific Input to Draft Inventories

We received multiple comments that provided information on specific wilderness inventory polygons or inventoried roadless areas, relative to their inclusion in the inventory or whether the commenter felt they should or should not ultimately become a recommended wilderness area.

Similarly, we received multiple comments that provided information on specific river segments, relative to their inclusion in the inventory, whether they have outstandingly remarkable values, or whether the commenter felt they should or should not be included as an eligible stream.

2.3.1 USFS Response to Theme 3

Depending on how the context of the comment fits in the process steps, our team will review each site-specific item and location against the inventory criteria or, later, against the evaluation criteria. This detailed review may result in some refinements and adjustments to the inventories that will be used for the evaluation phase of the process.

2.4 Theme 4: Specific Input to Wild and Scenic Rivers Draft Evaluation Framework

This theme captures the array of comments that pointed to specific modifications for the draft evaluation framework to be used in the evaluation phase of the wild and scenic rivers process.

Several comments requested that the framework be modified to include climate refugia and cold-water fisheries habitat as stand-alone values or incorporated into category criteria, and some that suggested expanding the region of comparison for these attributes. Some comments expressed an interest in expanding the framework to include elements such as habitat connectivity for a variety of species; the presence of certain species (such as Idaho great salamander, bull trout, beaver, and westslope cutthroat trout); the presence of certain habitat conditions (including but not limited to mature and old growth forest).

Several comments noted the importance of tribal involvement in identifying cultural values with respect to the outstandingly remarkable value framework.

Other comments expressed a concern that the framework is too inclusive.

2.4.1 USFS Response to Theme 4

The draft evaluation framework includes provision for many aspects of the comments received. Fish and wildlife outstandingly remarkable value categories include criteria specific to populations and/or habitat. These criteria consider the presence of federally listed, state listed, candidate, species of conservation concern, and species of public interest. Habitat elements consider uniquely diverse or high-quality habitat for species of national or regional significance, and/or may provide unique habitat or a critical link in habitat conditions for these species. Connectivity needs, security, crucial habitat, and quality habitat are also considered under the draft framework criteria. The issue of climate refugia is an emerging topic at the National level. Any adjustments to the draft evaluation framework based on this input will be approved by the Forest Supervisory and incorporated as appropriate into the draft evaluation of all streams in the wild and scenic river inventory.

There are other mechanisms in forest planning to help address some of these issues related to riparian management, habitat concerns, and species conservation, such as the development of ecosystem integrity

plan components, the identification of the Conservation Watershed Network, and the establishment of Riparian Management Zones, and the identification of species of conservation concern. Therefore, the team will continue to host dialogue around these important issues during the plan development process.

Tribal involvement will be important to identify outstandingly remarkable values associated with cultural resources as it relates to the wild and scenic river eligibility study. The team has been performing outreach to gather information from tribes. The Confederated Salish and Kootenai Tribes (CSKT) is currently a cooperating agency on the plan revision effort. Consultation with other tribes is ongoing as well.

2.5 Theme 5: Emerging Areas of Emphasis

Although many specific polygons and places were named and will be reviewed in detail with respect to potential modifications to the draft inventories, two landscapes received an array of comments and diverging perspectives.

- **Great Burn:** Of all the comments received related to wilderness topics, over 40 percent included input specific to the Great Burn area. Some comments emphasized the importance of allowing snowmobiling use in this area and there were perspectives that this use does not negatively impact resources and wildlife, and that it is also important to maintain access for active land management. Others felt that the Great Burn should become a recommended wilderness area due to its wildlife values, to protect it from mineral entry, or a desire for nonmotorized recreation.
- **Rock Creek:** Some perspectives held that if included as a recommended wilderness, more people would be drawn to the area, there would be negative impacts to local residents, and a loss of access with associated economic impacts. Others supported the inclusion of this area based on rationale such as climate refugia, connected ecosystems, and ecosystem services.

2.5.1 USFS Response to Theme 5

These tradeoffs and perspectives in these highlighted areas will be of key importance as we move into the evaluation, analysis, and recommendation phases of the wilderness recommendation process.

3. Next Steps

The information gathered from the comment period will be used as appropriate to make refinements to the draft inventories and evaluation frameworks or as a foundation for continued discussions through the evaluation and recommendation phases of these processes.

There will be public engagements on the evaluations of both wild and scenic rivers and wilderness inventory polygons in late summer and fall of 2023. The resulting wild and scenic rivers eligibility study and the wilderness evaluation results will be reflected and included with the proposed action in early 2024. There will be a formal comment period provided for the proposed action and, moving ahead, with the draft environmental impact statement.

Neither the inventories nor the evaluations are considered final until the plan decision is made.