



# Summary of Public Comments

## Draft Assessment and Potential Species of Conservation Concern

This document summarizes the comments submitted in response to the Lolo National Forest’s Draft Assessment and Potential Species of Conservation Concern List and Rational, which are part of the revised land management plan. This summary is organized into three sections and one appendix. Following a brief description detailing the comment period and public engagement efforts, the “summary of themes” section presents the six themes the planning team received in comments, followed by a short response. The final section describes how the planning team will use this information in the subsequent steps of the planning process.

## Comment Period Summary

An opportunity to submit comments on the draft assessment and potential species of conservation concern lists was provided for 30 days from June 9, 2023, through July 8, 2023. The comment period was advertised with a press release on May 17, 2023, four email announcements to over 800 self-subscribed recipients (on May 1, 2023; May 16, 2023; June 1, 2023; and June 9, 2023), multiple social media posts, and with postings on the Lolo National Forest Plan Revision Web Hub. Forest Service staff also provided verbal invitations and reminders at all public engagements in May and June. Options to submit comments included the online Content Analysis and Response Application (CARA), postal mail, and email ([SM.FS.LNFRevision@usda.gov](mailto:SM.FS.LNFRevision@usda.gov)). The review documents and supporting information were posted to the Web Hub on the day the comment period opened.

A variety of public engagement events were held to prepare the public to participate in this comment period. Workshops were held in February 2023, titled “*Common Ground in the Lolo*”, with content designed to create shared understanding and discuss the topics to be covered in the assessment. Four in-person (Missoula, Superior, Paradise, and Seeley Lake) and one online workshop were delivered, reaching approximately 126 participants. From February through May, the planning team also provided nine educational webinars on various resources and planning topics and hosted 25 “Ranger Chats” and five virtual “Open Office Hours,” which offered time for open dialogue. These events were attended by over 200 participants. The planning team also convened an Interagency Governmental Working Group, which met once before the comment period (March) and once during the period (June). Finally, Forest Supervisor Carolyn Upton hosted a “*Draft Assessment Roundtable Discussion*” engagement event in Missoula on June 14, 2023, shortly after the start of the comment period. Based on this engagement, the planning team provided an additional potential species of conservation concern-focused Office Hours session (June 27, 2023) to address concerns and provide additional information about the process.

Several requests to extend the 30-day comment period were received, both verbally during engagement events and in writing through the email or the CARA platform. Carolyn Upton, Forest Supervisor, decided not to extend this comment period, and provided her rationale in a letter to the public posted to the website on June 29, 2023. This response is provided in appendix A, below.

Approximately 87 comments were received. Approximately 10 of these were duplicates submitted to more than one commenting platform. Approximately 8 comments were form letters (the exact same content as another commenter). Therefore, approximately 69 unique comment letters were received. The number of comments received were distributed across the available commenting platforms as follows:

- CARA: Forty-eight comments were received directly through this platform, available from the revision website. Some individuals submitted multiple unique comments.
- Email: Thirty-seven emails with comments were received, several of which were duplicated in CARA.
- Postal mail: Two hardcopy letters were received in the mail, one of which was duplicated in CARA.

As stated in the planning rule directives, “*the public will have further opportunities throughout the plan development or revision phase and NEPA scoping to provide comment on information in the assessment or provide new information as it relates to the proposed action and other possible alternatives.*”

Accordingly, the planning team continues to receive and consider input related to the assessment. To date, approximately nine comments have been received outside of the comment period. These comments are included in this summary and in the revision of the assessment. Additional input and comments that are received will also be given consideration to the extent possible but may not be timely to reflect in the revised assessment.

All comments submitted via email or hardcopy were uploaded into CARA. Every letter was reviewed, and each unique issue or subject within the letter was identified. Similar issues and comments across all letters were grouped up into themes to facilitate an efficient review and response, as described below.

## Summary of Themes

A broad range of comments and perspectives were received. The following sections summarize the major themes that emerged from these comments, and a summary of the planning team's response to the input.

### Theme 1: Comments Not Relevant to this Planning Stage

The first theme includes comments asking for considerations in the revised plan (the proposed action), or for analysis considerations relevant to the development of alternatives or the draft environmental impact statement analysis. These issues are not directly relevant to the assessment or potential species of conservation concern but do present important issues and considerations that the team will consider in later steps in the planning process. Subtopics found in this theme include:

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| <ul style="list-style-type: none"> <li>• General process concerns.</li> <li>• Agency and private lands cooperation.</li> <li>• Aquatic components and effects.</li> <li>• Bull trout components and effects.</li> <li>• Climate and carbon components and effects.</li> <li>• Connectivity components and effects.</li> <li>• Ecological integrity components.</li> <li>• Elk components and effects.</li> <li>• Fire and fuels components and effects.</li> <li>• Focal species identification.</li> <li>• Fungi plan development and effects.</li> <li>• Grizzly bear components and effects.</li> <li>• Infrastructure components and effects.</li> <li>• Invasive plants components and effects.</li> <li>• Land allocation plan development.</li> <li>• Livestock grazing components and effects.</li> <li>• Lynx components and effects.</li> <li>• Old growth components and effects.</li> </ul> | <ul style="list-style-type: none"> <li>• Rattlesnake National Recreation Area components and effects.</li> <li>• Recreation opportunities components and effects.</li> <li>• Research natural area or special interest areas components and effects.</li> <li>• Roadless components and effects.</li> <li>• Desired recreation opportunity spectrum components and effects.</li> <li>• Species of conservation concern components and effects.</li> <li>• Snag components and effects.</li> <li>• Soils components and effects.</li> <li>• Timber components and effects.</li> <li>• Tribal components and effects.</li> <li>• Vegetation management components and effects.</li> <li>• Whitebark pine components and effects.</li> <li>• Wilderness and recommended wilderness components and effects.</li> <li>• Wildlife components and effects.</li> </ul> |
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### Response to Theme 1

These comments and issues will not be addressed in the revised assessment. However, they may be used later to develop alternatives or in the effects analysis of the draft environmental impact statement.

## **Theme 2: Process and Coordination**

These comments were related to the plan revision process and how the planning team works with other agencies and partners such as the counties; Montana Fish, Wildlife and Parks; Montana Department of Natural Resources and Conservation; the Bureau of Land Management, and private entities such as The Nature Conservancy and Five Valleys Land Trust that manage adjacent lands. There were also comments asking for clarity about the role of the assessment in the planning process. One comment pointed to a need to clarify the influence of litigation on forest management projects. Finally, multiple commenters pointed to the importance of tribal outreach, involvement, and consultation, including the inclusion of indigenous tribal ecological knowledge. Specific tribes that were mentioned include the Confederated Salish and Kootenai Tribes and the Nez Perce Tribe.

### **Response to Theme 2**

The planning team will work to expand the discussions of process and coordination in the revised assessment with other agencies, tribal governments, and private entities. Coordination with other agencies and partners is a crucial element of the revision process; currently, the planning team has established an Interagency Governmental Working Group and has encouraged all interested parties to request cooperating agency status. Those who have elected to engage with this status include the Confederated Salish and Kootenai Tribes; Mineral County; Montana Department of Natural Resources and Conservation; and Montana Fish, Wildlife and Parks. Moving forward, the planning team will continue to emphasize the importance of partnerships and coordination in the plan development process.

## **Theme 3: Best Available Scientific Information**

Across many themes, commenters provided scientific citations and references to inform the plan revision. Some of the information provided is more relevant to the plan development or environmental analysis stages of the process. Other comments addressed the issue of using the scientific information more broadly. Several comments explicitly requested that the plan revision process include an independent science review. Some requested to include more information and literature that the public has previously provided to project planning efforts on the Lolo, such as the Wildfire Adapted Missoula project. We received several comments suggesting that the assessment needs to include more monitoring information and results of monitoring from the 1986 Forest Plan, and a concern that the Forest Service does not adequately accomplish monitoring requirements.

### **Response to Theme 3**

The identification of science relevant to the planning process is an important role of the assessment. The citations and references submitted by the public are being reviewed by specialists. Additional information will be incorporated or acknowledged in the revised assessment. Those comments that provided context and rationale for the use of the literature are more easily addressed than those that did not. All attached publications, and those for which a complete citation was provided, are being filed and tracked for detailed review for applicability during the revision process. Some references were not presented with a full citation or were presented using website links that are outdated; the team will attempt to locate these items, but it might not be possible to give them full consideration. The determination of best available scientific information will not be completed for all citations and topics during the assessment phase; rather, the review of submitted material will be ongoing throughout the plan revision process. The request for an independent science review is being given careful consideration moving forward; however, we do not anticipate that this review will be convened or completed prior to completing the revised assessment.

## Theme 4: Distinctive Roles and Contributions

We received an array of comments asking for additional information and clarification in the description of the distinctive roles and contributions of the geographic areas on the Lolo National Forest. Some commenters provided detailed descriptions of elements such as the history and culture of rural communities, the history and role of the logging industry, the economic importance of landscapes, the conservation values of landscapes, and requests to clarify and emphasize the importance of the Lolo for landscape connectivity as well as native plant and animal species diversity. There were also comments that provided specific information on geological, topographical, and recreational values.

### Response to Theme 4

The planning team will endeavor to incorporate as much of the suggested information as possible and provide more detailed descriptions of distinctive roles and contributions in the revised assessment.

## Theme 5: Potential Species of Conservation Concern List

Many comments were related to the Potential Species of Conservation Concern list and rationale. Some comments included concerns on the process itself. Others identified specific species that the commenter felt warranted additional consideration as a species of conservation concern, and some provided specific information or literature to support their rationale. The species (or groups of species) that were named in the comments with requests for inclusion in the potential species of conservation concern list included:

### Terrestrial wildlife

- Bats
- Bighorn sheep
- Mountain goat
- Fisher
- Marten
- Coeur d'Alene salamander
- North American porcupine
- Northern alligator lizard
- Northern bog lemming
- Rattlesnake
- Grizzly bear
- Canada lynx
- Western bumblebee
- Western toad
- Wolverine
- Grey wolf
- Black-backed woodpecker

- Clark's nutcracker
- Common loon
- Flammulated owl
- Great grey owl
- Harlequin duck
- Lewis woodpecker
- Other birds (general)
- Northern goshawk
- Peregrine falcon
- Pileated woodpecker

### Plants

- Hairy cat's ear
- Hiker's gentian
- Whitebark pine
- Other plants (general)

### Aquatic species

- Bull trout
- Westslope cutthroat trout

## Response to Theme 5

For species that are currently listed as proposed, candidate, threatened, or endangered under the Endangered Species Act (e.g., grizzly bear, Canada lynx, whitebark pine, and bull trout), the regulations do not allow for them to also be considered for species of conservation concern listing; however, the revised plan will include plan components to support these species as appropriate. Over time, if the federally listed species change, the species of conservation concern list may be revisited as needed.

For other species identified, the planning team is reviewing the comments and rationale provided in the context of species of conservation concern requirements. This review will be used by the Regional Forester, Leanne Marten, to establish the species of conservation concern list that the Lolo National Forest will use for plan development. The revised plan must provide for the persistence of all native species in the plan area. It is possible that some species may not meet the criteria for a species of conservation concern but may warrant specific plan components to support their persistence, or to address other concerns, threats, or public interests. All species will be evaluated in this context during plan development and the subsequent environmental analysis.

## Theme 6: Resource-specific Input

This theme encompasses the many comments that provided input, science, content suggestions, and concerns about the assessment for specific resource topics listed below. Many commenters requested additional information or corrections to the analysis, incorporation of additional scientific information, and inclusion of conflicting viewpoints. Others commented that the conditions, status, and trends of the resource were either inadequately or incorrectly described in the draft assessment. Many commentors were particularly concerned about the influence climate change and increasing human pressures as drivers and stressors that need to be addressed in the revised plan.

## Response to Theme 6

The planning team is incorporating updates to the revised assessment where necessary for all topics within this theme. There are some complex and wide-reaching issues that cannot be fully explored or resolved at the assessment stage; rather, in some cases the revised assessment will acknowledge areas of conflict and uncertainty and identify where additional work and review is needed to address the issue moving forward in the planning process.

## Resource Specific Subtopics in Theme 6

The following subtopics were identified within this theme, sorted alphabetically.

### Aquatic Ecosystems and Species

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| <ul style="list-style-type: none"> <li>• Further address aquatic ecosystems, including connectivity.</li> <li>• Further address aquatic remediation activities necessary to address aquatic ecosystem health.</li> <li>• Further describe the conditions and trends of aquatic species and wildlife.</li> <li>• Further address bull trout status, habitat conditions, and expected trends.</li> </ul> | <ul style="list-style-type: none"> <li>• Further address beaver status, habitat conditions, and expected trends.</li> <li>• Provide additional information on conditions of streams, lakes, and reservoirs.</li> <li>• Provide additional discussion of the livestock impacts to aquatic species.</li> <li>• Provide additional information on the expected effects of roads to riparian areas.</li> </ul> |
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### **At-Risk and Other Wildlife Species**

- Further address habitat conditions and requirements for big game species.
- Provide a complete analysis of connectivity, acknowledge the role of riparian areas, and provide more discussion and science on species-specific connectivity issues.
- Further address motorized use impacts to wildlife, including differing perspectives and science, and the positive effects of human disturbance on wildlife.
- Clarify the timing and process for the identification of focal species.
- Incorporate additional information and modify the description for grizzly bear, monarch butterfly, wolf, and wolverine.
- Provide survey information on a variety of at-risk or indicator species.
- Consider ecosystem resilience from a wildlife perspective.

### **Climate Change, Carbon, and Forest Ecosystems and Management**

- Provide additional discussion of the impacts of logging, wildfire, and other influences on carbon stocks.
- Emphasize the influence that climate change will have on all resources.
- Address the concept of achievable desired conditions.
- Further describe the impacts of insects and disease.
- Further address appropriate methods for the development and uses of the natural range of variation analysis.
- Disclose reforestation vulnerabilities due to climate change and expected disturbances.
- Clarify the resilience of ecosystems.
- Identify additional unique ecosystems, such as fens; and add information to existing unique ecosystem descriptions.

- Identify fire refugia and describe their importance to the ecosystem.
- Address the role of fungi and mycorrhizae in the ecosystem.
- Further address the importance of old growth and mature forest.
- Provide additional information on the benefits and effects of timber harvest.
- Assess the “true cost” of wildfires from a carbon perspective.
- Further describe carbon defense strategies and the social cost of carbon.

### **Cultural, Historical, and Tribal Topics**

- Further describe the role of historic logging.
- Further describe the history and culture of rural communities.
- Work with tribes to address tribal areas of importance more explicitly.

### **Designated Areas**

- Further address the ecological importance of inventoried roadless areas.
- Provide additional information on wilderness and recommended wilderness conditions, management, suitable uses, and ecological benefits.
- Include information about wilderness legislation history.
- Provide additional information on wild and scenic rivers management.

### **Livestock Grazing**

- Describe the potential benefits of livestock grazing, such as fine-fuel reduction.
- Further describe the potential negative effects of grazing on other resources.
- Address issues with grazing permit administration and monitoring.

### **Fire, Fuels, and Fire Management**

- Address the existing and expected impacts of wildfires on air quality.
- Discuss hazardous fuels conditions in inventoried roadless areas.
- Further discuss the ecological role of fire in riparian areas.
- Further analyze fire and vegetation management, and treatment effectiveness.
- Further address historic and expected fire regimes as well as fire behavior.
- Address the importance of roads and infrastructure for fire suppression.
- Further explore wildland-urban interface conditions and management perspectives.

### **Infrastructure and Lands**

- Provide additional analysis on the roads present on recently acquired lands.
- Provide additional analysis of the undetermined roads on the landscape.
- Provide additional information on the resource impacts from roads.

### **Recreation and Scenery**

- Consider changes to the scenic integrity map in specific locations.
- Further describe an array of dispersed use mitigation methods.
- Further explore education and interpretation opportunities.
- Further disclose expected impacts of increasing recreation use.
- Further address mountain biking.
- Provide more information on recreation economics and opportunities.
- Provide additional information on regulations for recreation special use permits and expected demands in the future.
- Address recreation capacity and provide more clarity on sustainable recreation.

- Further address the issue of unauthorized uses and the associated impacts.
- Further describe various user conflicts and suitabilities on the landscape.

### **Social and Economic Considerations**

- Use additional or different economic data and analysis methods.
- Provide more information on fuel reduction economics and harvested wood products.
- Add information on Mineral County status and trends.
- Include nonprofit economic contributions.
- Include more population information.
- Further describe timber economic contributions.

### **Soils and Geology**

- Further describe management effects to soils, including soil disturbance.
- Provide more description of geological features.
- Further describe the role of downed wood in soil functions.
- Address concerns about current soil quality standards.
- Further address soils and carbon functions.

### **Watersheds and Water Uses**

- Reconsider the stated effects of vegetation to groundwater supplies.
- Further address the importance of groundwater dependent ecosystems.
- Further address source water and provide additional information on the fuel conditions in municipal watersheds.
- Provide more information on the importance of stream flows, floodplain connectivity, and the role of beavers.
- Utilize sources of information other than PIBO to discuss water quality monitoring.



- Acknowledge the need for a consistent framework to identify and classify source protection areas and municipal watersheds.
- Consider modifications to the watershed condition framework.

## Next Steps

1. *Revised Assessment:* The planning team is making edits to the revised assessment based on the public feedback received. We anticipate completing this by early September 2023, and posting this document for the public. Additional input to the assessment is welcome at any time during the planning process and we will continue to fold this input into the next planning stages as applicable.
2. *Preliminary Need to Change:* Based on assessment findings, the planning team is drafting a preliminary need to change document, which will launch the plan development stage and help focus the planning effort. A draft need to change document will be posted publicly at the same time as the revised assessment. This document will be refined during plan development. The need to change will be provided with the proposed action package for a comment period early in the new year.
3. *Plan Development Engagements:* In August 2023, the planning team will host public engagements around the wild and scenic rivers evaluation and the wilderness evaluation. Moving forward, the public will have several opportunities to provide input on the plan development process. The planning team will host a series of workshops in September 2023 focused on potential land allocations and desired conditions on the landscape by geographic area. In October 2023, the planning team will host a workshop series focused on specific resource topics and issues.
4. *Proposed Action:* Based on the need to change and public engagements, the planning team will develop a proposed action to launch the National Environmental Policy Act phase of the planning process. The proposed action will include a draft plan and all associated maps and appendices. The proposed action will be accompanied by a notice of intent to prepare an environmental impact statement, and a 90-day comment period will be provided. Following this stage, the process of alternative development and compilation of the draft EIS will begin.

## Appendix A: Upton Response to Requests to Extend the Comment Period

The Lolo National Forest is privileged to have a strong community of individuals, groups, and agencies invested in its land management plan revision. I am grateful for the collective efforts from public stakeholders in the revision process that have brought us to our current milestone: the release of the draft assessment and potential species of conservation concern list for comment. The Revision Team and the Lolo National Forest remain committed to enacting strategies that uphold the value of broad, inclusive, and transparent engagement.

### *Comment Period for Draft Assessment and Potential Species of Conservation Concern*

The Lolo National Forest is privileged to have a strong community of individuals, groups, and agencies invested in its land management plan revision. I am grateful for the collective efforts from public stakeholders in the revision process that have brought us to our current milestone: the release of the draft assessment and potential species of conservation concern list for comment. The Revision Team and the Lolo National Forest remain committed to enacting strategies that uphold the value of broad, inclusive, and transparent engagement.

As the Responsible Official for the Lolo's plan revision, it is my role to ensure the revision process produces the best possible Plan while adhering to the regulations governing land management planning. I have received requests to extend the current comment period. After careful consideration of the public's reasoning and reviewing them in context of the 2012 Planning Rule Directives, I have decided to adhere to the 30-day comment period set to end at midnight Saturday, July 8, 2023. I recognize the challenge presented in reviewing the extensive documentation we have compiled. However, it is also crucial that we proceed through the process in a timely manner. My reasoning is two-fold.

First, as stated in the 2012 Planning Rule Directives it is my responsibility to,

*“c. Make the draft assessment report available for public review and feedback during a specified time period. Notification that the draft assessment report is available for review should state that the assessment report will continue to be available for public review throughout the planning process. In addition, the notice should state that the public will have further opportunities throughout the plan development or revision phase and NEPA scoping to provide comment on information in the assessment or provide new information as it relates to the proposed action and other possible alternatives (see sec. 42.2 of this Handbook). (Chapter 1910.40, Sec 42.11, Num 1c)”*

This information is clearly posted on the Lolo Revision Web Hub and has been included in communication outreach from the Revision Team. While I strongly encourage that comments be submitted by July 8th to support the timely release of a revised Assessment, the Revision Team will continue to accept input on the Assessment throughout plan development and NEPA scoping. There are many opportunities ahead to submit information relevant to the Assessment as well as scientific information in support of plan development and analysis.

Second, in response to inquiries and concerns expressed around the complex species of conservation concern process, I directed the Revision Team to adapt their engagement strategy to support the public on this topic. They immediately scheduled subject matter experts during virtual Revision Office Hours (6/21/23) and a species of conservation concern-focused Office Hours session (6/27/23) to address

concerns and provide information about the documents. These opportunities were communicated widely on various platforms. Based on the positive feedback from those events, and the availability of future opportunities to comment, I believe the need to provide a meaningful opportunity to comment on the potential species of conservation concern has been appropriately addressed.

Again, I am grateful to the individuals who took the time to share their perspectives on this subject, and I look forward to reviewing the input on this important milestone.

Sincerely,

*Carolyn Upton, Lolo National Forest Supervisor*