

Objection Issues

This document is a summary of the issues identified in the objections that have been received to the Flathead National Forest's forest plan and Regional Forester's species of conservation list, the NCDE Grizzly Bear Conservation Strategy forest plan amendments for the Helena-Lewis and Clark, Kootenai, and Lolo National Forests, or the associated final environmental impact statement. Refer to this list to identify specific topics you would like to remain engaged with as an interested person as the objection resolution process continues (refer to www.fs.usda.gov/goto/flathead/fpr for more information). You can review the complete objection letters to identify issues raised by objectors in the reading room: <https://cara.ecosystem-management.org/Public//ReadingRoom?Project=46286>.

The following terms are used in the objection statements:

Term	Additional information/full name
amendment forests	Collective term for the Helena-Lewis and Clark, Kootenai, and Lolo National Forests
the Forest	Flathead National Forest
forest plan	Flathead National Forest Land Management Plan (2017 revision)
2012 planning rule	National Forest System land management planning rule (effective 2012)

Note: This summary of the objection issues is not a definitive list; the statements will continue to be refined during the objection review period.

Access

Objection 1. The forest plan does not provide adequate opportunities for motorized recreation.

Objection 2. The final environmental impact statement does not adequately analyze motorized recreation.

Canada Lynx and Critical Habitat

Objection 1. The final environmental impact statement does not adequately analyze impacts to Canada lynx and/or Canada lynx critical habitat.

Objection 2. The forest plan does not manage for ecological conditions necessary to ensure the long-term survival and persistence of Canada lynx.

Objection 3. The forest plan does not provide ecological conditions necessary to contribute to the recovery of Canada lynx as required by the Endangered Species Act.

Climate Change and Carbon Sequestration

Objection 1. The forest plan analysis does not adequately address carbon balance and sequestration or the impacts of climate change on forest and aquatic ecosystems and wildlife habitat.

Environmental Justice

Objection 1. The final environmental impact statement does not adequately address environmental justice issues and does not develop an alternative that provides a positive environmental justice outcome.

Fisheries

Objection 1. The final environmental impact statement does not adequately analyze impacts to bull trout and bull trout critical habitat and the Flathead forest plan components do not provide the ecological

conditions necessary to contribute to the recovery of the federally threatened bull trout and its designated critical habitat, failing to comply with the Endangered Species Act.

Forest Products and Suitability for Timber Production

Objection 1. The potential timber sale quantity and potential wood sale quantity stated in objectives FW-OBJ-TIMB 01 and 02 in the forest plan should clearly indicate that a higher level of timber harvest can be achieved.

Objection 2. The forest plan does not include sufficient plan direction for protection of ecosystem integrity when conducting salvage logging.

Objection 3. The forest plan analysis incorrectly calculates the sustained yield limit for timber.

Objection 4. The final environmental impact statement analysis does not adequately disclose the effects of budget constraints on timber outputs and acres treated and the resulting effects on wildlife.

Objection 5. The forest plan does not properly identify the lands suitable for timber production.

Fuels and Fire Management

Objection 1. The final environmental impact statement does not provide adequate analysis of the effects of fire suppression and fire suppression policies on the ecosystem.

Grazing

Objection 1. The forest plan is insufficient to prevent conflicts between livestock grazing and other resources.

Grizzly Bear

Objection 1. The forest plan and the NCDE amendments do not provide adequate regulatory mechanisms that will provide for recovery of the species.

Objection 2. The final environmental impact statement does not adequately analyze and disclose impacts on grizzly bears and/or grizzly bear habitat and is not based upon the best available science.

Objection 3. The forest plan and amendments do not provide for connectivity with the other grizzly bear recovery zones.

Objection 4. The forest plan improperly relied on the draft Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy; it should be based on a final conservation strategy.

Objection 5. The draft Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy is flawed in its assessment of population trends and mortality sources, its habitat objectives, and its demonstration of how “continual occupancy” by grizzly bears will be ensured in management zone 1.

Objection 6. Amendment 19 is the best available science to ensure the persistence of grizzly bears in the Northern Continental Divide Ecosystem.

Objection 7. The revised forest plan selected alternative, B modified, does not provide adequate protection for grizzly bears and does not ensure the continued survival and recovery of grizzly bears on the Flathead National Forest.

Infrastructure

Objection 1. The forest plan must identify a minimum road system

Land Management Planning

Objection 1. The final environmental impact statement does not adequately respond to the Forest Service's legal obligations under the 2012 planning rule.

Objection 2. The final environmental impact statement did an inadequate consistency review of growth policies, and the Forest Service's coordination with local, state, and tribal governments was inadequate.

Management Areas

Objection 1. The general forest management area 6c (high intensity) allocation in the Swan Valley should be changed to 6b (moderate intensity) to protect the high conservation values.

Objection 2. Krause Basin should not be a focused recreation area, should not allow motorized use, and should not be considered in the suitable timber base.

Monitoring

Objection 1. The monitoring plan in the forest plan is inadequate

National Environmental Policy Act

Objection 1. The final environmental impact statement does not provide a full range of alternatives.

Objection 2. The final environmental impact statement does not adequately address or respond to comments.

Objection 3. The final environmental impact statement does not provide a restoration alternative.

Objection 4. The final environmental impact statement does not consider an alternative that would make motorized over-snow vehicle use after March 31 unsuitable throughout the grizzly bear primary conservation area.

Other Threatened, Endangered, and Proposed Species

Objection 1. The forest plan does not provide the ecological conditions necessary to conserve wolverine.

Objection 2. The final environmental impact statement does not adequately analyze impacts on the wolverine.

Recommended Wilderness

Objection 1. The forest plan should increase the amount of recommended wilderness on the Forest.

Objection 2. The forest plan should decrease the amount of recommended wilderness on the Forest.

Objection 3. Management direction in recommended wilderness should allow mechanized transport and motorized uses.

Objection 4. Management direction in recommended wilderness regarding mechanized transport and motorized uses should be a standard and not a suitability plan component.

Objection 5. The wilderness evaluation process did not correctly adhere to Forest Service Handbook 1909.12 chapter 70.

Recreation

Objection 1. The recreation plan components in the forest plan do not meet the sustainability requirements in the 2012 planning rule.

Roadless Areas

Objection 1. The forest plan does not provide sufficient direction to manage roadless areas in the Forest to maintain their wilderness character.

Socio-Economics

Objection 1. The final environmental impact statement does not provide an alternative that improves income and employment in the more vulnerable counties.

Objection 2. The final environmental impact statement does not provide an economic analysis that includes ecosystem restoration.

Objection 3. The final environmental impact statement does not explain the economic risks of climate change.

Soils

Objection 1. The analysis and forest plan direction related to soils productivity are inadequate and are not based on the best available science.

Species of Conservation Concern

Objection 1. The regional forester does not identify certain species as species of conservation concern even though the best available scientific information indicates that there is a substantial concern for persistence of these species in the plan area (36 CFR 219.9(c)).

Objection 2. The revised plan does not provide the ecological conditions necessary to maintain a viable population of each species of conservation concern (36 CFR 219.9(b)).

Species of Conservation Concern—Animal species of conservation concern

Objection 1. The regional forester should identify the wolverine as a species of conservation concern.

Species of Conservation Concern—Plant species of conservation concern

Objection 1. *Dryopteris cristata* (crested shieldfern), a plant species of conservation concern, should be in the wetland or fen group, not the mesic montane group.

Objection 2. All proposed treatments (e.g., road building) should be preceded by surveys for plant species of conservation concern.

Travel Management

Objection 1. The Forest's reliance on amendment 24 does not comply with the requirements of the Travel Management Rule, subpart C.

Objection 2. The final record of decision should provide a specific timeframe for when site-specific analyses, such as winter travel management planning, should occur.

Objection 3. The forest plan does not meet the requirements of Executive Order 11644, “Use of Off-Road Vehicles on the Public Lands,” as amended by Executive Order 11989.

Old-Growth Forest

Objection 1. The forest plan analysis and management direction is inadequate for protecting old-growth forest.

Watershed and Riparian

Objection 1. The forest plan does not contain measurable habitat objectives or standards for aquatic ecosystems and does not protect riparian areas from vegetation management and road management.

Wildlife—General

Objection 1. The forest plan does not provide adequate protections for wildlife.

Objection 2. The forest plan does not provide the ecological conditions necessary to ensure the viability or the long-term survival and persistence of numerous wildlife species.

Objection 3. The forest plan does not provide for the habitat needs of elk.

Objection 4. The forest plan does not maintain or restore connectivity.

Wild and Scenic Rivers

Objection 1. Streams with critical habitat for sensitive, threatened, or endangered species should be ranked as having an outstandingly remarkable value and should be made eligible wild and scenic rivers on the Forest.