

Objection Issue Briefing Paper: Wildlife – Diversity

Date: Sept. 29, 2020.
Contact: Leanne Marten
Phone: 406-329-3511
Email: leanne.marten@usda.gov

DRAFT: For purposes of facilitating discussion for objection resolution process only.

Summary of objection issues:

- Objectors contend plan components are not based on the best available scientific information and are insufficient to protect wildlife and wildlife habitat. Objectors specifically mention bighorn sheep, northern goshawk and other forest raptors, old-growth and snag dependent species, forest carnivores, sagebrush dependent species, species of conservation concern, current regional forester sensitive species, and species that rely on large blocks of undisturbed habitat.
- Objectors contend the final environmental impact statement failed to analyze impacts to species of conservation concern (flamulated owl and Lewis's woodpecker) and to current regional forester sensitive species.
- Objections include requests to monitor forest plan impacts on a larger suite of wildlife species

Background information:

- The 2020 Revised Forest Plan uses a complementary ecosystem (coarse filter) and species-specific (fine filter) approach to provide for the diversity of plant and animal communities and maintain the persistence of native species in the plan area as required by the 2012 Planning Rule.
 - Analysis for wildlife species was based on habitat groupings directly tied to the coarse filter ecosystem characteristics that support native and desired non-native species. Where useful, some wildlife species or groups were discussed within the context of related habitats (e.g., bighorn sheep, gray wolf) or in separate sections (e.g., elk, and at-risk species including federally listed/proposed species and species of conservation concern).
 - The project record includes a biological evaluation that assesses potential impacts of the 2020 Forest Plan on species currently listed as regional forester sensitive species that are known or suspected to occur on the Forest.
 - Bighorn sheep health and risk management related to contact with domestic sheep and goats varies based on the specifics of bighorn sheep populations and permitted grazing operations. The 2020 Forest Plan relies on interagency recommendations to incorporate risk analysis approaches that are flexible and can be updated based on new science.
 - In the Rocky Mountain Range and Upper Blackfoot Geographic Areas, plan components for grizzly bears provide added constraints on domestic sheep and goat grazing that will also benefit
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bighorn sheep from a disease risk standpoint.

- Concern regarding mountain bike impacts on wildlife is related to other access, suitability, and specific area-related objections. The final environmental impact statement cites literature regarding the impacts of various recreational activities, including mountain biking, on wildlife.

Summary of examples of proposed resolution(s) submitted by objectors:

General wildlife

- Withdraw the 2020 Forest Plan and begin a new process of public collaboration
- Request to change various guidelines to standards

Bighorn sheep

- Prohibit permitted domestic sheep or goat grazing in any geographic areas with bighorn sheep or where analysis indicates risk, and/or establish a minimum distance between domestic grazing and known bighorn herds.
- Require 'permeability' analysis prior to vegetation management to assess changes in risk to bighorns from off-national forest livestock as a result of vegetation changes.
- Limit or prohibit use of pack goats in areas with bighorn sheep herds.
- Coordinate with other agencies to manage risks to bighorn sheep from permitted grazing across administrative boundaries and to restore bighorn sheep to areas where previously extirpated.



Objection Issue Briefing Paper: Wildlife –Connectivity

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Summary of objection issue:

- The 2020 Forest Plan doesn't comply with law and regulation because it doesn't provide conditions to achieve genetic and demographic connectivity between the Northern Continental Divide Grizzly Bear Ecosystem and other grizzly bear ecosystems (*see also Endangered Species Act issue below*).
- Connectivity areas should be identified and mapped, and additional plan components included to promote connectivity.

Background information:

- The interagency Northern Continental Divide Ecosystem Conservation Strategy identifies Zone 2 on the HLC NF as having potential for genetic connectivity with the Greater Yellowstone Ecosystem, but does not identify it as a demographic connectivity area (areas identified in the Conservation Strategy where occupancy and reproduction by females is expected or desired). Plan components based on the conservation strategy were approved in the 2018 Record of Decision for the Forest Plan Amendments to Incorporate Habitat Management Direction for the Northern Continental Divide Ecosystem Grizzly Bear Population and are retained unchanged for the plan revision draft record of decision.
- The 2020 Forest Plan identifies areas where management practices would be constrained in order to maintain or enhance connectivity, and includes numerous desired conditions related to maintaining connectivity at varying scales. The accumulation of existing wilderness, recommended wilderness, inventoried roadless areas, conservation management area, and areas designated with primitive and semi-primitive non-motorized recreation opportunity spectrum categories contribute to connectivity throughout the Forest.

Proposed resolution(s) submitted by objectors:

- Remove site-specificity from components for connectivity in the Divide Geographic Area and apply them throughout the full area.
 - Add more direction for connectivity in the 2020 Forest Plan, including specific direction to decrease (not just prevent increase) motorized use in some areas and mandate wildlife passage structures in certain areas (e.g., Highway 200).
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- Identify spatially explicit connectivity areas and plan components to identify and protect connectivity, particularly to strengthen the ability of wildlife to adapt to effects of climate change
- Increase collaboration with tribes and other agencies to promote connectivity during project and transportation planning.
- Specific to grizzly bear connectivity (*see also Endangered Species Act issue below*):
 - Extend Zone 1 road density and other protections throughout Zone 2 (and potentially parts of Zone 3).
 - Identify areas for connectivity between the Northern Continental Divide and Greater Yellowstone Ecosystems and include plan components in those areas for secure habitat to ensure potential for dispersal-related occupancy.



Objection Issue Briefing Paper: Wildlife – Endangered Species Act

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Summary of objection issue(s):

For grizzly bear, objections contend:

- Plan components in the 2020 Forest Plan do not provide the ecological conditions necessary to contribute to the survival and recovery of grizzly bears (see also Connectivity issue).
- The 2020 Forest plan and environmental impact statement analysis improperly relied on:
 - The Northern Continental Divide Conservation Strategy
 - Flawed population estimates and habitat-based recovery criteria
 - The analysis fails to adequately measure motorized route density and impacts
- The final environmental impact statement does not provide an adequate baseline or analysis of past and future loss of vegetative cover providing secure habitat.
- The final environmental impact statement failed to analyze potential grizzly bear mortality related to the grazing program.

For Canada lynx, objectors contend:

- Plan components for lynx in the 2020 Forest Plan are not based on best available scientific information and do not provide the ecological conditions necessary to contribute to lynx recovery.
- The analysis for lynx is inadequate.
- Monitoring for lynx and designated Canada Lynx Critical Habitat is inadequate.

For wolverine, objectors contend:

- Plan direction and analysis for wolverine are inadequate and the Forest should take a more proactive approach to wolverine conservation

Background information:

As indicated in the connectivity briefing information, grizzly plan direction approved in 2018 amendments to the Helena and Lewis and Clark forest plans was retained unchanged during plan revision. The revised plan also retains the Northern Rockies Lynx Management Direction. However, an additional forestwide desired condition to provide habitat conditions that would support lynx is included in the 2020



Forest Plan.

Consultation with the Fish and Wildlife Service on federally listed and proposed species (grizzly bear, Canada lynx, and wolverine) has been ongoing since late 2018. The final biological assessment for terrestrial wildlife species was submitted to the Fish and Wildlife Service on 9 March 2020, and a biological opinion is anticipated soon. The biological assessment and biological opinion both address recent lynx research and updated estimates of grizzly bear population size and trends in the updated conservation strategy. Consistent with the final environmental impact statement, the biological analysis also addresses:

- Impacts to grizzly bears in all grizzly bear management zones on the HLC NF
- Analysis of potentially secure grizzly bear habitat across the HLC NF
- Potential impacts of temporary motorized routes, livestock grazing, and late-season winter recreation on grizzly bears throughout the HLC NF

Summary of examples of proposed resolution(s) submitted by objectors:

Grizzly bear

- Include temporary motorized routes in calculations of route density and habitat security.
- Prohibit addition of current or future unauthorized routes into the Forest Service road system.
- Re-consult with the U.S. Fish and Wildlife Service on the impacts of including the 2018 Grizzly Bear Amendments into the 2020 Forest Plan.
- Add forestwide standards for livestock grazing related to grizzly bears.

Canada Lynx

- Adopt additional standards to ensure appropriate management/conservation of lynx winter habitat.
- Update the retained Northern Rockies Lynx Management Direction standards to reflect recent research.
- Analyze effects of motorized access on lynx.
- Convert guidelines into standards.
- Adopt and implement an effective monitoring program for lynx and lynx habitat.
- Revise the analysis to address new science and species viability.
- Include a map of the wildland urban interface indicating where exceptions to lynx plan components apply.

Wolverine

- Supplement the analysis of short and long-term effects of the 2020 Forest Plan on wolverine.
- Implement steps to eliminate or reduce non-climate stressors on wolverine.



Objectors/Interested Persons:

Name	Organization	Objector/Interested Person
Zach Angstead	Montana Wilderness Assn.	Objector
James Bradley		Interested Person
Eric Clewis	Montana Wildlife Federation	Objector
Cory Davis		Interested Person
Joseph Donohoe		Objector
Kendall Flint	Two Medicine Family	Interested Person
Sara Jane Johnson	Native Ecosystems Council	Objector
Gayle Joslin		Interested Person
Rick Kerr		Interested Person
Jocelyn Leroux (with Adam Rissien and Michael Garrity)	Western Watersheds Project (with WildEarth Guardians and Alliance for the Wild Rockies)	Objector and Interested Person
Sarah Lundstrum	National Parks Conservation Association	Objector/Interested Person
Laramie Maxwell	Center for Large Landscape Conservation	Objector
Peter Metcalf	Glacier Two-Medicine Alliance	Objector/Interested Person
Peter Nelson	Defenders of Wildlife	Objector
Denny Palmer		Interested Person
Bonnie Rice	Sierra Club	Objector
Eric Sivers		Interested Person
John Tubbs	Montana Department of Natural Resources and Conservation	Interested Person

