

Intermountain Forest Association

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March 24, 2014

Thomas Tidwell,
Chief, USDA Forest Service
Attn: EMC-Administrative Reviews
1400 Independence Ave. SW
Mailstop 1104
Washington, D.C. 20250-1104

Dear Chief Tidwell:

Pursuant to 36 CFR 219 subpart B, this is an objection to the Shoshone NF's Revised Forest Plan by the Intermountain Forest Association. Regional Forester Dan Jiron is the Responsible Official.

The Intermountain Forest Association submitted numerous comments regarding the revision of the Shoshone NF Forest Plan.

Objection Issue #1

The Forest Service's premise for the Northern Rockies Lynx Amendment (NRLA) was that it would be short-term direction until the forest plans were revised, at which time the NRLA direction would be reviewed and revised (see Attachment #1). The short-term nature of the NRLA was a major reason underlying the Forest Service's determination that the NRLA was a non-significant amendment. However, the Forest Service subsequently changed course and elected to only superficially consider revisions to NRLA direction as part of the Shoshone NF forest plan revision, even though the Forest Service had the authority to make changes to NRLA direction (see Attachment #2).

IFA's concerns regarding lynx management were addressed in comment letters dated August 9, 2006, March 27, 2007, July 25, 2008, February 2, 2012, and November 26, 2012.

There are four specific items within Issue #1:

1-The Shoshone NF does not meet the USFWS's criteria for an 'occupied' Forest.

According to the NRLA FEIS (p 3, see Attachment #3), lynx habitat on an entire national forest is considered occupied by lynx when: "1. There are at least two verified lynx observations or records since 1999 on the national forest unless they are verified to be transient individuals; or 2. There is evidence of lynx reproduction on national forest."

The USFWS defined "verified lynx record" as "... based on McKelvey *et al.* (2000a, p.209): (1) an animal (live or dead) in hand or observed closely by a person knowledgeable in lynx identification, (2) genetic (DNA) confirmation, (3) snow tracks only when confirmed by genetic analysis (e.g., McKelvey *et al.* 2006, entire), or (4) location data from radio or GPS-collared lynx. Documentation of lynx reproduction consists of lynx kittens in hand, or observed with the mother by someone knowledgeable in lynx identification, or snow tracks demonstrating family groups traveling together, as identified by a person highly knowledgeable in identification of carnivore tracks" (Federal Register / Vol. 78, No. 187 / Thursday, September 26, 2013 / Proposed Rules, p 59448, see Attachment #4).

From the discussion in the FEIS (p 154-155, Attachment #5), presumably the best available science, the Shoshone NF does not meet those criteria, i.e., "Lynx occur at very low densities within the region. During recent surveys in the winter of 2008 to 2009, one potential track was found on the Shoshone near the Beartooth Plateau (Holmes and Berg 2009). Tracks were found on multiple occasions adjacent to the Shoshone in the Togwotee Pass area on the Bridger Teton National Forest. During the winter of 2004 to 2005, one confirmed track was detected on the Shoshone in the Warm Springs Creek watershed (Berg et al. 2005). The WGFD (2010) suggest that released lynx from Colorado are the only lynx left in Wyoming and that native Wyoming populations are nearly extirpated. ... Recently, habitat and extensive winter snow survey work for this species was conducted on the Shoshone in partnership with the WGFD. ... Tracks of two different lynx were confirmed in the Dubois/Togwotee Pass area in the winter of 2006 to 2007 and tracks of a single lynx in the Washakie Ranger District area were located. In the winter of 2008 to 2009, a possible lynx track was located in the Beartooth Mountains, just across the Wyoming/Montana state line, but immediately adjacent to the Shoshone."

Suggested Improvement – revisit Shoshone NF designation as 'occupied' Forest.

2-The Shoshone NF did not consider and incorporate best available science that would have allowed increased precommercial thinning.

The virtual prohibition on precommercial thinning in lynx habitat will significantly reduce board-foot growth, especially in young lodgepole pine stands. According to the NRLA Record of Decision, "Precommercial thinning is not allowed in young regenerating lodgepole pine forests, unless new research indicates it is beneficial or benign" (Attachment #6).

The FEIS (p 159, Attachment #7) discusses precommercial thinning and snowshoe hare abundance, including findings by Griffen and Mills (2007) (Attachment #8) that “precommercial thinning decreased snowshoe hare habitat abundance, compared to unthinned stands (control plots) and areas where 80 percent of the stand was thinned, but 20 percent was unthinned”. However, the FEIS did not consider precommercial thinning where 20 percent of the stand was unthinned as an alternative to no precommercial thinning despite the fact that Griffen and Mills (2007) found effects on snowshoe hares comparable to no precommercial thinning.

According to the FEIS (p 159, Attachment #9), the Shoshone NF made some changes to the NRLMD in Alternative F, and thus opened the door to consider and allow additional changes.

Suggested Improvement – eliminate restrictions on precommercial thinning in lynx habitat, contingent on leaving 20% of the stand unthinned.

3-According to the FEIS (p 158, Attachment #10), some activities in “matrix habitat” would not always be considered an adverse effect to lynx critical habitat. However, the Revised Plan does not reference “matrix habitat” or activities that would be allowed. Instead, the Revised Plan states (p 225, Attachment #11) “The following management direction applies to all National Forest System lands that are known to be occupied by Canada lynx.”

Suggested Improvement – clarify that restrictions in Appendix 1 do not apply to “matrix habitat”.

4-The identification of lynx habitat should be a forest plan decision, available for public review and comment.

According to the FEIS (p 156, Attachment #12), “The Shoshone has mapped lynx habitat following criteria in the Lynx Conservation Assessment and Strategy (LCAS) (Ruediger et al. 2000), into lynx analysis units (LAUs) on a majority of the Forest (see map 7). ... About 597,000 acres have been mapped as lynx habitat within lynx analysis units on the Shoshone (table 36).”

The public has not had a chance to review and comment on lynx habitat mapping on the Shoshone NF nor on the criteria adopted by the Forest Service as part of the LCAS. Mapping nearly 600,000 acres of the Shoshone NF for management as lynx habitat, with the significant implications that that has on forest management, is much too important to not allow public review and comment.

Further, the Shoshone NF should have considered an alternative that excluded the suited timberlands from being mapped and managed as lynx habitat.

Suggested Improvement – provide an opportunity for public review and comment on lynx habitat mapping and consideration of alternatives.

Objection Issue #2

The direction on page 48 of the Revised Plan (Attachment #13) to “assume sensitive species presence” is inappropriate and should be deleted. This was addressed in the IFA November 26, 2012 comment letter.

Suggested Improvement – delete “assume sensitive species presence”.

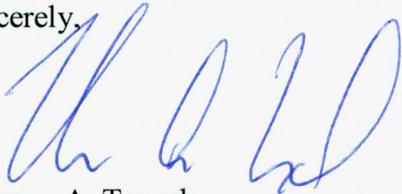
Objection Issue #3

TIM-GUIDE-01 (Plan p 76, Attachment #14) is inappropriate and should be deleted. All projects to implement the Revised Forest Plan must conform to Forest Plan direction plus comply with NEPA and other legal requirements. There is no reason to single out “timber harvest activities”. This was addressed in the IFA November 26, 2012 comment letter.

Suggested Improvement – delete TIM-GUIDE-01.

Thank you for your consideration.

Sincerely,



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