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Thomas Tidwell, Chief of the U.S. Forest Service
Attn: EMC—Administrative Reviews
1400 Independence Avenue SW, Mailstop 1104
Washington, DC 20250-1104

Submitted electronically at: objections-chief@fs.fed.us

Subject: Shoshone National Forest Land Management Plan, 2014 Revision
Responsible official: Daniel Jiron, Rocky Mountain Regional Forester

Dear Chief Tidwell,

Natural Resources Defense Council (NRDC) submits the following objections to the Final Environmental Impact Statement, the Revised Shoshone Land Management Plan, and the Draft Record of Decision for the Shoshone National Forest, released in January 2014. NRDC is a national conservation organization with over 1.4 million members and online activists whose purpose is to safeguard the earth: its people, its plants and animals, and the intact natural systems upon which all life depends. NRDC has more than 2,500 members and online activists in Wyoming, many of whom regularly hike, hunt, fish, camp, and treasure the magnificent landscape, scenery and native wildlife of Wyoming and the Shoshone Forest. We submit these objections on behalf of our members and activists to improve the level of protection afforded to the threatened grizzly bear. The grizzly bear is especially important as it serves as an umbrella species, indicating the health of the whole ecosystem.

We submitted substantive comments on the draft Environmental Impact Statement and draft revision of the Land Management Plan for the Shoshone National Forest and appreciate the opportunity to follow up on concerns that were not addressed in the Revised Land Management Plan (RMLP) or the Draft Record of Decision. We also include two new substantive comments based on information that was not available to the public until after the comment period ended. This objection letter, like our November 26, 2012, comment letter, is limited to the Plan's impacts on grizzly bears.

We are encouraged by the Forest's inclusion of Guideline 16 on page 44 of the RMLP that allows for Forest-wide food storage infrastructure. We trust that in order to promote human safety and discourage habituation of grizzly bears that the infrastructure and Forest-wide food storage orders are put in place

and implemented in a timely manner. The Forest should place a priority on areas where bears are expanding in an effort to be proactive in preventing conflicts.

More broadly, we are deeply concerned that the Forest does not seem to have incorporated changes to the draft plan recommended overwhelmingly by the public. It is clear from the comments submitted that the majority of the public does not want to see any new surface occupancy allowances for oil and gas extraction and is widely opposed to any new motorized use. Specifically, 70% of the letters submitted directly by individuals supported undeveloped areas remaining undeveloped, and 75% of the individual letters from Wyoming residents who commented on motorized use indicated support for no expansion of motorized areas. Despite these comments, the Forest has recommended both expansion of motorized use and surface occupancy for resource extraction.

Our following objections outline the unresolved concerns from our substantive comments and are supported by the majority of public comments received.

1. We object to the Forest allowing for the addition of motorized trails in areas of occupied grizzly bear habitat.

We are disappointed that the preferred Alternative G would allow for additional motorized recreation in currently occupied grizzly bear habitat. We are particularly concerned with any motorized miles being added in the Primary Conservation Area (PCA) (e.g. Sunlight Basin), and areas adjacent to the PCA that are extensively used by grizzly bears and considered to be secure grizzly bear habitat (e.g. Castle Rock, Telephone Draw, Franc's Peak, and Wood River areas). If these areas are opened to motorized recreation, they will lose their value as secure habitat and increase the likelihood of conflicts.

Roads and motorized trails are key factors in grizzly conflicts and deaths, as noted in numerous places in the final Environmental Impact Statement (p. 163, 165, and 178), the Revised Land Management Plan, and the Biological Assessment. We again request that the Forest manage these areas as non-motorized back-country and that no additional motorized use be allowed in occupied grizzly bear habitat.

2. We object to management recommendations that would allow for surface occupancy for the purposes of resource extraction in occupied grizzly bear habitat.

We are glad to see that the Forest reassessed lands adjacent to other federal and state lands prohibiting surface occupancy for oil and gas development and we support the decision by the Forest to deem these lands as unsuitable for surface occupancy in the final plan. However, the final plan still allows for surface occupancy in other occupied grizzly bear habitat.

Under the final plan, surface occupancy allowances could be made in the Castle Rock wilderness evaluation area and parts of the Dubois area, both of which are frequently used by grizzly bears. Any surface occupancy in occupied grizzly bear habitat will increase the chances of human-bear conflicts, and will reduce the small percentage of the historical range available to grizzly bears. We again urge the Forest to prohibit surface occupancy in any occupied grizzly bear habitat.

The following substantive comments are based on new information that was not available to the public during the original comment period.

1. Mortality limits for grizzly bears need to be updated in the final Environmental Impact Statement.

The mortality limits for grizzly bears indicated in the final Environmental Impact Statement (p. 169) are 9% for females and dependent young, and 15% for independent males. New mortality limits have been proposed as part of the Revised Supplement to the Grizzly Bear Recovery Plan (U.S. Fish and Wildlife Service, 2013). The final plan should be updated to reflect this change.

2. Grazing allotments currently occupied by grizzly bears should be identified using new distribution estimates.

The final Environmental Impact Statement (FEIS) indicates that 29 allotments are occupied by grizzly bears outside the Primary Conservation Area (p. 171), and that the distribution of the grizzly bear population on the Shoshone has not really changed in the last 8 years. The FEIS also indicates that all 13 of the grazing allotments unoccupied in 2003 are still considered unoccupied in 2011 (p. 175). Since the original comment period, a new scientific paper has been published (Bjornlie, et al. 2013) that updates grizzly bear distribution estimates. We request that the Forest include this new information and ensure that the FEIS is up to date with current estimates of grizzly bear distribution and that all grazing allotments in the Forest are correctly identified as occupied or unoccupied. The Forest should be proactive and begin to work to retire or move allotments in areas where bear use is increasing.

We maintain the recommendation that the Forest seek opportunities to retire sheep and cattle allotments, particularly in high conflict areas such as the Bench, Beartooth/Face of the Mountain, Table Mountain, Dunoir, Ramshorn/Parque Creek/Horse Creek, Wiggins Fork and Wind River allotments where many grizzlies have already died as a result of conflicts.

We appreciate the opportunity to submit these objections and comments, and look forward to a response to them.

Sincerely,

Christine Wilcox

LITERATURE CITED

Bjornlie, D.D., D.J. Thompson, M.A. Haroldson, C.C. Schwartz, K.A. Gunther, S.L. Cain, D.B. Tyers, K.L. Frey, and B. Aber. 2013. Methods to estimate distribution and range extent of grizzly bears in the Greater Yellowstone Ecosystem. *Wildlife Society Bulletin*.

U.S. Fish and Wildlife Service, 2013. Grizzly Bear Recovery Plan – Draft Revised Supplement: Revised Demographic Recovery Criteria for the Yellowstone Ecosystem. Missoula, Montana, USA.