



USDA
Forest Service

FINAL Environmental Impact Statement

National Forests in
Colorado & southern Wyoming
October 2008

Southern Rockies Lynx Management Direction

Volume 2



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Appendix I Responses to the Comments Received from the Public and Other Agencies on the DEIS and SDEIS

The DEIS was mailed to federal, state and local agencies, tribal representatives, and the public in January 2004. The SDEIS was mailed to federal, state and local agencies, tribal representatives, and the public in September 2006.

During the 90-day review period for the Draft Environmental Impact Statement (DEIS) approximately 240 responses were received. Several responses were duplicates submitted in multiple formats (e.g. hard copy mail, email, facsimile). During the 90-day review period for the Supplemental DEIS 32 responses were received. Table 1 lists the assigned comment letter number, the commenter and organization/affiliation for comments received for the DEIS. The commenters listed in Table 1 correspond to the entries in Table 3 DEIS Comment and Responses. Parties may be listed more than once due to duplicate responses received (e.g. hard copy letter, electronically transmitted via fax and or email.). Table 2 lists the commenter information for comments received on the SDEIS that correspond to the information in Table 4.

We appreciate all the time the public put into reading and commenting on the DEIS and SDEIS. All comments were read and a content analysis process was used to systematically compile, categorize, and understand the full range of public viewpoints. The interdisciplinary team reviewed the comments and prepared responses accordingly.

In general the comments fell into five basic groups: 1) telling us what alternative should be chosen or not chosen; 2) telling us how to modify the alternatives; 3) suggesting new alternatives or management direction; 4) telling us how to supplement, improve, or modify the analysis in the DEIS or SDEIS; 5) making factual corrections to the DEIS or SDEIS; 6) or asking questions. Comments were used in completing the FEIS and in developing Alternative F.

Table 1 DEIS Commenters

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
1	SWANSON	JOHN	
2	LIEN	DAVID	
3	HOGAN	TIM	
4	JONES	LARRY	
5	MAUCKER	JIM	
6	SNYDER	RENEE	
7	GARLAND	JOHN	
8	CROWDER	WILLIAM	
9	DELLENBAUGH	RAY	
10	SIMON	KALEB	
11	BRUCE	JOHN	
12	SUMERLIN	BILLY	GRAND CNTY DEPT OF NATRL RESRCS
13	CLOUD	NEIL	SOUTHERN UTE INDIAN TRIBE
14	WYATT	RICHARD	CNTY OF JACKSON
15	ETCHEPARE	JOHN	WY DEPT OF AGRCLT
16	RIGGS	RANDY	
17	YEARY	MICHAEL	USDA, CO WILDLIFE SERVICES

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
18	ZIMMERMANN	ROLAND	MTN VIEWS RV RESORT
19	FOREMAN	WILL	
20	HOLLENSHEAD	DON	
21	ZAJAC	LYNEE	
22	BUCHHEIM	BRICE	
23	STORM	BERTHA	
24	ALWARD	JOHN	
25	ALWARD	BECKY	
26	MCDOWELL	DEBRA	
27	BRANDT	PERRY	
28	MCDOWELL	ETHAN	
29	PETTIS	KENNETH	
30	MCDOWELL	TRISHA	
31	HOLVECK	MARLA	
32	FRENCH	JESSIE	
33	BRANDT	NATALIE	
34	HELMERICKS	ANGELINE	
35	HRDLICKA	WILLIAM	
36	KETTERING	FRED	
37	PAYNE	TOM	
38	HOWARD	DONALD	
39	HOWARD	MOIRA	
40	DE PRIEST	RICHARD	
41	MCCLURE	MIACHAEL	
42	HOWARD	DONALD	
43	HOWARD	MOIRA	
44	RUSSELL	CECILIA	
45	RUSSELL	RON	
46	RESIDENT		
47	POWERS	EDNA	
48	SAWATZKY	JOYCE	
49	MERCER	JENNIFER	
50	CANDELARIA	NICHOLE	
51	PHILBERN	NATHAN	
52	SAWATZKY	JERRY	
53	WAMSLEY	BOB	
54	ZERENER	KATHLEEN	
55	RIGGS	GENE	
56	POWERS	VERLE	
57	KING	LAMOINE	
58	SHEPERD	DENNIS	
59	LECOUR	ROBERT	RIDGEWAY OURAY CMNTY CNCL
60	SMITH	WILLIAM	
61	SWINGLE	BRENT	
62	BAUGH	ROYCE	
63	WARREN		
64	CROWDER	BRAD	EPA-REGION 8, NEPA
65	GRIMM	LEROY	
66	SMITH	TERYN	
67	WARREN		
68	SCHAEFER	GREG	ARCH COAL, INC
69	BARNES	BLAIN	
70	BAUGH	ROYCE	
71	BILICKA	JOSEPH	
72	GREEN	ALLEN	NRCS

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
73	SINGLER	DYANNE	
74	KOZIOL	MONICA	FRONT RANGE CHEF, LLC
75	PROBST	HOLLY	WESTERN BUSINESS ROUNDTABLE
76	WILLIAMS	EZEKIEL	ARNOLD & PORTER LLP
77	WIGHT	D	CO OFF-HIGHWAY VEHICLE COALITION
78	COMPTON	RICHARD	WHITE RIVER CONSERVATION PROJECT
79	PETERSON	JEFF	CO DEPT OF TRANSPORTATION
80	MCNABB	KERRY	
81	SORENSEN	LINDA	
82	HALL	GENE	CODY LUMBER INC
83	GRAY	ANDY	GRAY BROTHERS LOGGING & LAND MGMT
84	BOWER	DRU	PETROLEUM ASSN OF WY
85	KARAN	DAVID	LARIMER CNTY, PLANNING & BLDG SVCS
86	GOIN	WAYNE	MINION HYDROLOGIC
87	HEDBERG	KIM	BACKCOUNTRY SNOWSPORTS ALLIANCE
88	LEADLEY	JOHN	LEADLEY'S ADIRONDACK SUGAR BUSH
89	MOSELEY	CLAIRE	PUBLIC LANDS ADVOCACY
90	TORBIT	STEVEN	NATIONAL WILDLIFE FEDERATION
91	HOWARD	DONALD	
92	HOWARD	DONALD	
93	MCDOWELL	JAKE	
94	KETTERLING	DARLA	
95	FISHERING	NANCY	CO TIMBER INDUST ASSN
96	TAYLOR	DOROTHY	
97	BETTINGER	MARY	
98	ROBERTSON	MARY	
99	PEIRONNET	CYNTHIA	
100	SUMERLIN	BILLY	GRAND CNTY DEPT OF NATRL RESRCS
101	PHILBERN	BILL	
102	KING	DANIEL	
103	WALKER	HORACE	
104	MILLER	CURTIS	SOUTH FORK POWDER BUSTERS SNOWMOBILE CLUB
105	KUKUK	ROBERT	
106	NICHOLS	JEREMY	BIODIVERSITY CONSERVATION ALLIANCE
107	MORRISON	DAVID	
108	MILLER	CURTIS	
109	ALEXANDER	KELSEY	
110	ETCHART	ERNIE	CO WOOL GROWERS ASSN
111	MARTZ	JOHN	
112	NICKERSON	BRUCE	
113	KUKUK	JANELLE	
114	MORRISON	CONNIE	
115	RULE	WALT	
116	BERGER	JIM	BERGER RANCHES
117	DALRYMPLE	ROBERT	
118	HOLLENSHEAD		
119	POWELL	HAROLINA	
120	KUKUK	JOAN	
121	EVANS	ROGER	
122	MEYERS	INTERMTN RESOURCES, LLC	
123	POKORNEY	EDWARD	DENVER WATER
124	RENNELS	KATHAY	BOARD OF CNTY COMMRS
125	CREWS	DONALD	
126	GAILLARD	DAVID	PREDATOR CONSERVATION ALLIANCE

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
127	TROXEL	TOM	INTERMTN FOREST ASSN
128	DEWBERRY	JAMES	CO TRAPPERS ASSN
129	SHEPERD	MACYLE	
130	BOARD OF CNTY COMMRS, MINERAL CNTY		
131	SNODGRASS	SANDRA	HOLLAND & HART LLP
132	SHEPERD	D	
133	FUNK	WENDELL	
134	KEITH	MARIA	NATL HUMANE EDUC SCTY
135	ZANONI	ZEKE	
136	ARMSTRONG	TIM	ADAMS ST COLLEGE, BIO DEPT
137	BERDE	JOANIE	CARSON FOREST WATCH
138	RICHMOND	PAT	
139	KUKUK	COLEMAN	
140	GATTIS	WILLIAM	
141	GATTIS	DEBRA	
142	CRAIG	BRAD	
143	KEITH	MARIA	NATL HUMANE EDUC SCTY
144	MITCHELL	DIANA	
145	BRINKER	DENNIS	POLE MTN PARTNERSHIP
146	CHRISTY	ALLAN	
147	ERICKSON	GARY	BIGHORN LUMBER CO INC
148	ZANDRA	DENNIS	
149	SMITH	JACOB	CNTR FOR NATIVE ECOSYSTEMS
150	WILLIAMS	EZEKIEL	CO SKI COUNTRY USA, INC
151	WYLEY	KEN	
152	HOWARD	MOIRA	
153	SPENCER	ALBERT	
154	WEBER	JAY	
155	FIEF	RON	
156	HARRISON	RANDY	
157	POLLOCK	KATHLEEN	
158	EVANS	DAVE	
159	MILLER	PHILIP	
160	HADAWAY	TRACY	
161	SHEPERD	D	
162	SHEPERD	D	
163	HICKS	JIM	CDOW
164	BAKER	WALTER	
165	UNRUH	JERRY	
166	TAYLOR	THERESA	USBR, OFFICE OF PRGM AND POLICY SERVICES
167	BAKER	WALTER	
168	HAWTHORNE	BRIAN	BLUERIBBON COALITION
169	VIGIL	VIVIAN	MEDICINE BOW ROUTT NF
170	SCOFIELD		
171	ZADRA	DENNIS	
172	BAILEY	TIM	
173	METZGER	BETH	N PARK NTRL RESCS CMNTY GROUP
174	SCHWAN	M	
175	BROTENHAGEN	JIM	
176	ROSIER	DEBORAH	
177	DAY	BILL	BLACK CYN AUDUBON CHAPTER
178	KIENE	STEVEN	
179	EDWARD	ROBERT	CARNIVORE RESTORATION PROG
180	HAMMEL	RICK	
181	RENO	FRANK	

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
182	DEWBERRY	JAMES	CO TRAPPERS ASSN
183	LORCH	BRIAN	
184	CIUFFINI	COMPUTER SYSTEMS ENGR	
185	BIRD	BILL	
186	SOPPE	TOM	
187	MOFFETT	JAMES	
188	BLACKWELL	SAMA	
189	CARTER	JEFFREY	
190	COX	HOWARD	
191	SEIDENBERG	JENNIFER	
192	GRIFFIN	SARAH	
193	GERRANS	JOE	
194	BRUSH	DEBBIE	
195	ANIELLO	PETE	
196	SMITH	CHARD	
197	JOHNSON	KIRK	
198	HOWARD	JUDITH	
199	DANDEL	CHERYL	
200	HUNT	WILLIAM	
201	FREEDMAN	RORY	
202	ETCHART	ERNIE	CO WOOL GROWERS ASSN
203	KEESEY	JAMES	
204	BLACKWELL	GREGORY	
205	SHARP	TOM	
206	SILVERMAN	LAUREN	
207	BLICKENSDEFER	TOM	CO DEPT OF NATURAL RESOURCES
208	FISCHER	SCOTT	WA DEPT OF NATURAL RESOURCES
209	GARRETT	STEVE	
210	BELFAST	MARK	
211	EAST	WAYNE	CO WILDLIFE FEDRN
212	MILLER	ANNE	
213	GUYOTE		
214	POWERS	EDNA	
215	HALL	GENE	CODY LUMBER INC
216	VIEIRA		
217	YATES	MARY	
218	YATES	JOHNNY	
219	GRAY	ANDY	GRAY BROTHERS LOGGING & LAND MGMT
220	JONES	LARRY	
221	CANALY	CHRISTINE	SAN LUIS VALLEY ECOSYSTEM CNCL
222	SORENSEN	LINDA	
223	HARRISON	RANDY	
224	GARLAND	JOHN	
225	MILLER	PHILIP	
226	FREUDENTHAL	DAVE	ST OF WY, OFFICE OF GOVERNOR
227	HOWARD	MOIRA	
228	HOWARD	DONALD	
229	BOND	MICHAEL	BOND ENERGY
230	TORBIT	STEVEN	NATIONAL WILDLIFE FEDERATION
231	WICHERS	BILL	WY GAME & FISH DEPT
232	BOWER	DRU	PETROLEUM ASSN OF WY
233	PETERSON	MARY	
234	GOIN	WAYNE	MINION HYDROLOGIC
235	GEORGE	RUSSELL	CO DEPT OF NTRL RESOURCES
236	MCCLOSKEY	BRUCE	CDOW

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
237	ASH	JANA	DIV OF WATER RESOURCES
238	JOE	DUDA	CO ST FOREST SERVICE
239	LAVERTY	LYLE	CO ST PARKS
240	SMITH	JACOB	CNTR FOR NATIVE ECOSYSTEMS
241	ALEXANDER	KELSEY	
242	REMINGTON	THOMAS	CDOW
243	HILLIS		
244	HAWTHORNE	BRIAN	BLUERIBBON COALITION
245	WICHERS	BILL	WY GAME & FISH DEPT
246	STEWART	ROBERT	US DEPT OF INTERIOR

Table 2 lists the assigned comment letter number, the commenter and organization or affiliation for comments received for the SDEIS. Table 2 corresponds to the entries in Table 4 SDEIS Comment and Responses.

Table 2 SDEIS Commenters

LTR NUM	NAME_LAST	FIRST	ORGANIZATION
1	BLICKENS DERFER	TOM	CO DNR
2	BERDE	JOANIE	CARSON FOREST WATCH
3	ANIELLO	PETER	
4	CONTIGUGLIA	GEORGIANNA	COLORADO HISTORICAL SOCIETY, SHPO
5	JONES	DAVE	
6	ROBERTS	GENE, ET AL.	WILDERNESS TRAILS RANCH
7	BOND	MICHAEL	BOND INVESTMENT GROUP
8	CARROLL	MACY	
9	MULTIPLE SIGNATURES		COLORADO SNOWMOBILE ASSOCIATION
10	PEAVLER	TERRY	
11	FLAUGH	LISA	
12	RIGGLE	DON	COLORADO 500
13	FLAUGH	ZECHARIAH	
14	HARTLESS	MARK	
15	UNRUH	JERRY	
16	GHERARDI	BILL KEN AND	COLORADO FORESTRY ASSOCIATION
17	HILLIS ENVY	GWEN DON	
18	MORRISSEY	JENNIFER	FOCUSED ON THE FOREST, LLC
19	RULE	WALT	
20	RICHMOND	CHARLES	GMUG
21	SPAULDING	CARL	COLORADO TIMBER INDUSTRY ASSOCIATION
22	TROXEL	TOM	INTERMOUNTAIN FOREST ASSOCIATION BOARD OF COUNTY COMMISSIONERS, MINERAL COUNTY
23	PHILBERN JR.	WILLIAM	
24	LARRATT	DENNIS	COHVCO
25	WEILAND	DEBBIE	BUENA VISTA SNOWMOBILE CLUB
26	MONARCH	JOHN	
27	STEWART	ROBERT	DEPARTMENT OF THE INTERIOR
28	SMITH	JACOB	CENTER FOR NATIVE ECOSYSTEMS ET AL. GRAND COUNTY DIVISION OF NATURAL RESOURCES
29	SIDENER	AMY	
30	SHEPHERD	HAROLD	CENTER FOR WATER ADVOCACY
31	KUNTZ	DAVID	
32	SVOBODA	LARRY	ENVIRONMENTAL PROTECTION AGENCY

Tables 3 and 4 list the comments received on the Draft Environmental Impact Statement and Supplemental DEIS prepared for the Southern Rockies Lynx Amendment. The majority of the comments are included as submitted, some comments are presented as excerpts of longer statements. The full letters are available in the project file at the Rocky Mountain Regional Office in Lakewood, Colorado.

For Table 3, the column information is defined below:

LTR_NO indicates the number assigned to the letter. Where multiple letters included a common comment, Letter #/Comment # format is used in the LTR_NO column (e.g. 4/1; 95/1; 147/1; 158/1).

Com# indicates the number assigned to that comment for the referenced letter. Where multiple letters included a common comment the information is as noted above.

CODE is a numerical assignment based on the following categorization:

Decision making Processes 10000-19999

Alternatives 20000-22999

Legal Concerns 23000-25999

Tribal Concerns 26000-29999

Environmental Management 30000-39999

Transportation Systems and Infrastructure 40000-44999

Recreation Management 45000-49999

Lands Activities 50000-52999

Special Lands Designations 53000-55999

Natural Resource Management 60000-69999

Social Concerns 70000-72999

Economic Concerns 73000-75999

Attachments 99999

The SDEIS Comments and Responses are noted in Table 4 at the end of this section with the affected resource area noted.

Table 3 DEIS Comments and Responses

LTR_NO	Com#	CODE	COMMENT	RESPONSE
168	9	10000	BRC strongly supports and recommends the inclusion of alternative language that would allow expanding winter recreation in some places where heavy public use existed in 1998, 1999 or 2000 into the new Preferred Alternative (Alternative E).	Comment noted.
5	3	10000	A Lynx program might be OK if it were contained entirely in legally defined Wilderness and if the Lynx could survive entirely on their own without human support, and if the Lynx were not listed on ESA as threatened or endangered. American habitat is not natural to Canadian Lynx. Neither is	Comment noted. The historical and current occurrence of lynx in the United States is well substantiated.

LTR_NO	Com#	CODE	COMMENT	RESPONSE
			enforced government support.	
15	1	10000	Although a few lynx have been documented in northern Wyoming, the ability for the lynx to establish a continuing healthy population has never occurred anywhere in the state. Wyoming forests are predominately lodgepole pine forests in an arid climate; which, consequently, do not provide suitable understory forage development or growth for either the snowshoe hare or Canada lynx. We encourage the associated federal agencies to spend their precious time and money on habitat areas in other states that provide suitable habitat for lynx; not on areas and management in Wyoming which provide little, if any, habitat benefit.	Comment noted. There are a substantial number of verified records of lynx in Wyoming (Ruggiero et al. 2000). We agree that conservation efforts should be directed to habitat that is capable of supporting lynx and snowshoe hares. This EIS uses our best estimates of the amount and distribution of lynx habitat at this time; these maps are updated and refined site-specifically during project planning and analysis.
64	14	10000	The stated Purpose and Need is to conserve and recover the lynx. Section 7 (a) (1) of the Endangered Species Act states that all Federal agencies shall, in consultation with and with the assistance of the Secretary of the Interior, utilize their authorities in the furtherance of the purposes of this Act by carrying out programs for the conservation of endangered and threatened species. Please add "recovery" to the proposed Goal in Table 2-1.	The Purpose and Need is actually stated: To establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices on the Southern Rockies national forests, while preserving the overall multiple-use direction in existing Forest Plans. Suggestion noted.
4/1; 95/1; 147/1; 158/1;		10000	The proposed amendments are premature and inappropriate since the U.S. Fish and Wildlife Service has not yet designated critical habitat or developed a Recovery Plan.	The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
8/1; 14/1; 95/11; 127/11; 145/1; 146/1;		10000	Amending the forest plans as proposed is premature and inappropriate. The Purpose and Need indicates that adoption of the proposed management direction is needed to comply with the Endangered Species Act (ESA). However, the ESA requires the identification of Critical Habitat and development of a Recovery Plan, neither of which have been completed by the US Fish and Wildlife Service (FWS). Consequently, the Forest Service does not have an adequate basis on which to base its compliance with the ESA. The Forest Service should not be prescribing management direction for portions of the national forests that are not critical to the conservation of lynx.	
95/25; 127/25;		10000	We are not convinced that the proposed amendments will "preserve the overall multiple use direction in existing forest plans" since the real effects on overall multiple use direction in the existing forest plans have been only superficially analyzed. We are especially concerned with the statement in the Purpose and Need that "Adjustments to individual plans may be considered as they are revised during the next several years", and that the stage is thus set for subsequent amendments or reductions of multiple use outputs after the forest plans have already been amended to incorporate	We disagree. The FEIS in Chapter 3 contains substantial analysis, at the programmatic level, of the potential effects under each alternative of the management direction on other resource outputs and outcomes. The analysis is separated by national forest as appropriate. Any subsequent amendments or revisions will be done with opportunity for public participation through the NEPA process.

LTR_NO	Com#	CODE	COMMENT	RESPONSE
			lynx direction.	
117	12	10000	There is an extensive analysis on the effects to lynx in this document. However there is only superficial analysis to address the effects of the alternatives on the stated purpose and need of preserving the overall multiple use directions in the existing Forest Plans. There is no discussion on the significance of the effects of these changes to the individual Forest Plans. In order for the Deciding Official to make a rational decision, it is important for both him and the public to see how each alternative meets the entire purpose and need including how it preserves the overall multiple use directions in each existing Forest Plan.	We disagree. The FEIS in Chapter 3 contains substantial analysis, at the programmatic level, of the potential effects under each alternative of the management direction on other resource outputs and outcomes. The analysis is separated by national forest as appropriate. Any subsequent amendments or revisions will be done with opportunity for public participation through the NEPA process. An NFMA significance evaluation was completed and is documented in the FEIS and ROD.
95/24; 127/24;		10000	We have numerous concerns with the Purpose and Need for the proposed amendment. One of the statements from the Purpose and Need is "To establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices, while preserving the overall multiple use direction in existing forest plans". However, the DEIS does not propose or evaluate a wide range of alternatives for the conservation and recovery of lynx consistent with this broad statement of Purpose. All the alternatives considered are based on the Lynx Conservation Assessment and Strategy (LCAS) with only slight variations.	Comment noted. The best available information was considered in the development of the proposed action. New information and issues from scoping were used in the development of alternatives. Alternative F was developed between the DEIS and the FEIS to incorporate updated information.
126	35	10000	The Forest Service analysis should focus on the FWS biological opinion on the LCAS: This is the relevant document that upholds and enforces a regional lynx conservation strategy. The lack of such a strategy was the basis for the listing of the lynx under the Endangered Species Act, and has created the Purpose and Need for this amendment process.	The LCAS is not a decision document and there was no Biological Opinion written on it. The Southern Rockies Lynx amendment includes the contiguous forests in Colorado to ensure a consistent strategy is in place. The Forest Service will complete consultation with the FWS on the selected alternative prior to issuing a Record of Decision.
126	21	10000	Alternative E fails to meet the "Purpose and Need" for the proposed amendment: to correct the lack of guidance in existing land management plans that results in the listing of the Canada lynx as threatened under the federal Endangered Species Act. Failure to fully address threats to the lynx with adequate regulatory mechanisms is a failure to meet the Forest Service's obligations to restore lynx under both the Endangered Species Act and the National Forest Management Act.	There is no Alternative E in the Southern Rockies Lynx amendment. Chapter 3 of the EIS displays the effects of the alternatives on the lynx, and specifically addresses the requirements under the 1982 NFMA regulations to maintain viable populations of lynx. The Forest Service consulted with the FWS to ensure the selected alternative will not jeopardize the lynx.
149	45	10000	The preferred alternative fails to meet the "Purpose and Need" for the proposed amendment. The DEIS concedes that the preferred alternative "may lead to adverse effects" to lynx productivity, mortality, and movements. The DEIS at S-16 further concludes that the preferred alternative "Decreases probability of lynx presence, as compared to	Although the Alternative D had some adverse effects, the alternative still met the stated Purpose and Need. A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered

LTR_NO	Com#	CODE	COMMENT	RESPONSE
			Alternative B, but greater than Alternative A. Management direction may not ensure sufficient habitat quantity, quality, distribution, and other conditions to provide for lynx productivity."	comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
173	3	10000	We strongly recommend that the Forest Service not proceed with the amendment process. The proposed amendments are equally applicable to all habitats that could support lynx, based on a "decision" by the ID Team, despite acknowledgements in the DEIS that many of the included areas have always been marginal lynx habitat where lynx are rare.	Comment noted.
173	4	10000	We strongly recommend that the Forest Service not proceed with the amendment process. The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are, or how they are identified.	Comment noted. Identification of lynx habitat and linkage areas is based on the best available science, and will be refined site-specifically at the project level.
173	5	10000	We strongly recommend that the Forest Service not proceed with the amendment process. The Lynx Conservation Assessment and Strategy, on which the proposed amendments were based, is a self-described very conservative approach to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan Goals and Objectives subservient to lynx Goals and Objectives, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of preserving the overall multiple-use direction in existing forest plans, or the requirements of the Organic Act or National Forest Management Act.	Comment noted. As stated in the EIS, all alternatives that were carried forward for analysis are consistent with the Purpose and Need, and will provide for lynx conservation while preserving the overall multiple use direction in the forest plans.
173	6	10000	We strongly recommend that the Forest Service not proceed with the amendment process. The Proposed amendments do not contain a Desired Future Condition that addresses the condition, structural stage, age class, and distribution of lynx habitat and management strategies to move toward the Desired Future Condition.	Comment noted. The Vegetation standards and guidelines indirectly state the desired future condition for lynx habitat. For example, VEG S3 directs that at least 10% of the habitat should be in denning habitat (typically old growth structural stage) and well-distributed. VEG S1 directs that no more than 30% of the habitat should be in the very early seral stages (seedling/stand initiation stage).The best available information was considered in the development of the proposed action.
173	7	10000	We strongly recommend that the Forest Service not proceed with the amendment process. The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the [LCAS], with only slight variations	Comment noted.
122	6	10000	We strongly recommend that this process to amend the forest plans be abandoned. Clearly there is critical error in this amendment, and we would be better served to consider lynx management direction in the plan revisions or by pursuing a significant forest plan amendment for each	Comment noted. A Regional approach was chosen in order to gain efficiency and consistency. The FEIS in Chapter 3 contains substantial analysis, at the programmatic level, of the potential effects under each alternative of the management

LTR_NO	Com#	CODE	COMMENT	RESPONSE
			national forest, including an in-depth review of the effects on forest management, timber sale programs and forest health, a range of alternatives for mapping lynx habitat, alternatives to consider changes to VEG S5 as outlined in our detailed comments, and a full opportunity for the public review and comment. Additionally, the Records of Decision should make it explicitly clear that multiple use outputs remain a goal of the National Forests in Colorado.	direction on other resource outputs and outcomes. The analysis is separated by national forest as appropriate. The Multiple Use-Sustained Yield Act of 1960 requires that the national forests be managed so that all of the various renewable surface resources are utilized in the combination that will best meet the needs of the American people.
147	6	10000	The Forest Service should not proceed with the proposed forest plan amendments. Instead the Forest Service should address lynx conservation issues in individual forest plan revision and amendments, after the Fish and Wildlife designates Critical Habitat and completes a Lynx Recovery Plan, as required by the Endangered Species Act.	A Regional approach was chosen in order to gain efficiency and consistency. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied.
173	8	10000	We strongly recommend that the Forest Service not proceed with the amendment process. Instead, the Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures, as anticipated in the DEIS, based on designated Critical Habitat and a Lynx Recovery Plan.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
186	1	10000	Please support and implement a strong Southern Rockies Lynx Amendment. Do everything you can to protect these important animals and let them thrive.	Comment noted.
211	23	10000	Within the three action alternatives, there are several exemptions for what the USFS calls extremely rare situations. If these scenarios are so rare, why are the exemptions necessary at all? Instead, a simple site-specific forest plan amendment could be done to facilitate the action. By including exemptions for every possible situation, the USFS undermines the purpose and need for the action. Regulatory mechanisms that are hampered by such exemptions likely would be ineffective, and the final EIS needs to point that out.	Comment noted. The exemptions vary slightly by alternative related to responding to emergency situations (wildfire suppression), to be responsive to other multiple-use management goals (e.g. developed recreation sites), and implementing national direction (e.g. Healthy Forest Initiative, Forest Service Energy Implementation Plan). The range of alternatives is responsive to public comments.
230	9	10000	The NWF has concerns about the conclusions for lynx conservation in the DEIS (pages 45-49). The document does not include a discussion about how these alternatives address the purpose and need for the amendment. We believe the document should include this discussion. After reviewing the "outcomes" on page 46, it is clear that Alternative B fully addresses lynx conservation and would meet the purpose and need of the plan amendment. Alternatives C and D do not address the purpose and need,	The purpose and need is two-fold: To establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices on the Southern Rockies national forests, while preserving the overall multiple-use direction in existing Forest Plans. All action alternatives respond to the purpose in need, albeit in varying ways.

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			which is the conservation of the lynx.	
82	2	11000	The ambiguous nature of the proposed amendments, the lack of clear direction as to what actually constitutes Lynx habitat, what might contribute to Lynx habitat, and how these areas are identified should be considered as a "Red Flag". Lack of clear direction invites never-ending litigation and abuse of the purpose of the proposed amendments. Removing public review and comment on what constitutes Lynx habitat, and how it is identified raises questions on the validity of how the areas included in the proposed are defined.	Appendix F, included in the DEIS and SDEIS, disclosed the scientific process the forests used to determine lynx habitat. The resulting mapping was an inventory of habitat. During site specific analyses, the mapping will be refined and updated .
150	9	11000	The Forest Service should also retain its ability to tailor future project level decisions to take into account future lynx critical habitat designations. The Fish and Wildlife Service estimates that it will propose critical habitat for lynx by November 1, 2005, and complete a final designation by November 1, 2006. Rather than adopt one-size-fits-all lynx management direction now, flexible lynx standards and guidelines will allow the Forest Service to make better project level decisions depending on whether critical habitat is present or not.	The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS. A Regional approach was chosen in order to gain efficiency and consistency.
150	53	11000	The Forest Service should identify, however, exactly how it would procedurally and substantively make the findings contemplated in All Standard 2. The process should be transparent. Opportunities to participate should be available for those who are affected by it, such as a special use permittee. CSCUSA suggests that the Forest Service use the analytic test recently described by the Fish and Wildlife Service (and quoted above in the section discussing the 2003 Listing Decision) for determining whether a particular project would adversely affect lynx.	All S2 is incorporated into Alternative D. The remaining alternatives do not include this measure. The Forest Service is aware of guidance provided by FWS regarding analysis of effects.
196	2	11000	We can't believe it, but perhaps the Service operates on the principle blurted out by one of this state's representatives when she responded to the obvious question with - "So what! We can always get our beef from Mexico." Take charge of the woods. They belong to all of us - not only the wealthy voices of the Sierra Club, PETA, Earth First - well, you get the drift. Leave the lynx where they are.	Comment noted.
106	17	11120	The USFS has failed to address the adequacy of lynx habitat mapping through the DEIS and proposed lynx amendment despite public concerns, despite the interconnected nature of lynx habitat mapping and the	The Forest Service completed mapping of lynx habitat in accordance with interagency guidance and in coordination with FWS. The information presented in the EIS is

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			proposed amendment, and despite the fact that consideration of lynx habitat mapping is essential to ensuring the USFS fully analyzes a range of reasonable alternatives for the proposed lynx amendment. To remedy this situation, we request that the USFS immediately halt any and all project-level actions that rely on currently mapped lynx habitat amendment and a decision on the amendment is issued.	programmatic in nature, and is continually refined and updated during project level planning per the conservation agreement.
109	4	11120	The US Forest Service has gone beyond its authority in this DEIS. The US Fish and Wildlife is required by statute to identify critical habitat for threatened species and to develop recovery plans. It has not done that to my knowledge for the lynx. The USFS has no business issuing this DEIS before that. The USFS has no business identifying lynx habitat as it does in this DEIS. And it has no business setting forth in the public record these items of management that are not on USFS land.	The Endangered Species Act requires that all federal agencies use their authorities to conserve threatened and endangered species. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. The conservation agreement established a process for mapping lynx habitat. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS...
229	9	11120	Please keep in mind that [the USFS does] not work for, nor represent, the oil, gas and timber industry, but rather the American people, who love and want to protect their wildlife, wild lands, and outdoor resources. A strong and well-implemented lynx management plan is a key part of this process.	Comment noted.
235	36	11120	The definition for Lynx Linkage Areas (Appendix C, p.9) includes "non-lynx habitat such as basins, valleys, agricultural lands, or where lynx habitat naturally narrows between two blocks" and is highly problematic. These areas contain non-federal lands of varying uses and run the risk of those uses being fully restricted, certainly by future critical habitat designation if not land-use restrictions. The fact that many of these lands are outside the management jurisdiction of the U.S. Forest Service creates havoc in land-use decisions which likely affect private lands, federal and state highway corridors, state school lands, and county and municipal lands.	Comment noted. Critical habitat was designed by FWS in 2006. None of the linkage areas in the amendment area were designated as critical habitat. The Forest Service decision on this amendment will apply only to NFS lands.
125	4	11200	I find it interesting that the White River National Forest was omitted from your list of forests for which this DEIS would apply. A few years ago, this was the forest that was used as an example of habitat that was ideal for the sustainability of the lynx re-introduction program. To some, this may appear to be not-so-subtle move on the part of the Forest Service capitulating once again to the powerful Summit County ski industry lobby.	Comment noted. The White River National Forest originally was not included because their ongoing Forest Plan revision was to be completed prior to this amendment. The White River NF subsequently was added to this planning process through a Supplemental DEIS, in response to decisions on forest plan appeals. This decision will amend the White River's revised forest plan.
138	3	11200	[Alternatives] C and D are concessions to lobbyists that have plenty of money to promote their agendas. The snowmobile industry and commercial timber are more interested in profits than forest health.	Alternatives C and D were developed in response to comments received on the proposed action during scoping.

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140	4	11200	Some restrictions as proposed would negatively effect responsible forest management and use, including snowmobile trail use, pre-commercial thinning, fuel reduction projects to reduce the threat of forest fire, which impacted this area as recently as two years ago. The point is simple, there is a place for conservation and responsible management of public lands. There is no place, and this is not the time, for radical restrictions pushed by ill-advised environmentalist, who could care less about the impact or well being of others.	Comment noted. Chapter 3 discloses the anticipated effects of implementing the alternatives considered.
145	3	12000	The DEIS does not adequately identify which portions of the affected national forests will be affected by the proposed amendments. Without detailed information about the location and extent of lynx habitat and linkage boundaries, the Forest Service is simply not in a position to accurately analyze and describe effects and potential impacts. The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are, or how they are identified.	The DEIS provides a map of the lynx analysis units at the regional scale. Detailed maps of lynx analysis units at the National Forest scale are available from each National Forest. Those maps are updated as new information becomes available. Identifying and mapping lynx habitat and linkage areas is a scientific process using the best available information. The process used is identified in Appendix D for linkage areas and Appendix F for lynx habitat. Public review and comment is not a part of the identification of lynx habitat. Public comments are appropriate on the management of the identified lynx habitat and linkage areas during site specific project planning.
4/3; 95/4; 127/4		12000	The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are or how they are identified.	
147	2	12000	We did not get an opportunity to review and comment on the mapping of the Lynx analysis units. Many people within the Forest Service acknowledge that different standards were applied to mapping LAUs in Wyoming and Colorado. A map displayed at the open house in Laramie showed a "linkage" running up the Rawahs on the east side of North Park, Colorado and tried to tell me that the area was primarily spruce/fir type. That is wrong. It is primarily lodgepole pine. We did not get an opportunity to provide any input on mapping...I ask that the mapping of LAUs and "linkage" areas be pulled and an opportunity for public review and comment for the mapping be provided.	
64	95	12100	The Table of Contents indicates sequential numbering of the pages, but page numbering begins anew at the beginning of Chapter 3 and no longer does the Table of Contents apply, making it difficult to find specific impacts in the Environmental Consequence chapter. The Table of Contents does not allow a reader to find specific information provided in tables and figures. The omissions and mistakes further make it difficult for DEIS reviewers to document and reference their concerns.	Comment noted. Errors in pagination were corrected in the SDEIS and will be corrected in the FEIS.
77	8	12100	As is the case with the lynx itself, the DEIS fails to show the reader any real data, population or otherwise, concerning the prey of the lynx: the	Comment noted. Lynx mortality data are present in chapter 3.

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			snowshoe hare. This data must be provided prior to any decision. No wonder so many of the lynx released are dying - they have nothing to eat.	
77	7	12100	The agency must reveal its scientific data related to the lynx to the public, and in so doing help restore the integrity of the Forest Service and the public's belief that the federal agencies are truly serving the public, rather than the guessed-at needs of an imaginary animal.	Identifying and mapping lynx habitat and linkage areas is a scientific process using the best available information. The process used is identified in Appendix D for linkage areas and Appendix F for lynx habitat. This EIS uses our best estimates of the amount and distribution of lynx habitat at this time; these maps are updated and refined site-specifically during project planning and analysis.
95	14	12100	6.3 million acres of national forest land in the Southern Rocky Mountain Geographic Area (SRMGA) have been mapped as lynx habitat within LAUs, but there has never been a forest plan amendment or a Line Officer decision or public review and comment regarding designation of LAUs or mapping of lynx habitat.	
117	10	12100	Please provide a definition of "historical" as it is a key criterion in several Standards and Guidelines.	There is no one definition of "historical." The definition depends upon the context. An ecological assessment is being prepared for each forest and will include an analysis of "historical range of variability" for that forest.
117	13	12100	The Forest Plans, which are developed with great expense and public involvement, can be considered a contract with the public. Making changes to the Forest Plans should not be done without full assessment and disclosure to the public. The effects of the amendment alternatives on each of the individual Forest Plans should be assessed and displayed in detail. the effects on each Forest Plan include the timing, scope, goals, objectives and outputs, and management prescriptions should be displayed. This assessment will also be necessary in order to make a reasoned determination on the significance of the proposed amendment in the Decision.	Comment noted. This is the purpose of the Southern Rockies Lynx Amendment planning process.
126	42	12100	The Forest Service states that "more than half the people who responded submitted form letters" (p. 17). The Forest Service should define what it means by a form letter. If there are different kinds of form letters and from different sources, the Forest Service should explain and quantify these differences for the public to better understand the results of the public participation thus far.	Comment noted. Form letters are generally templates set up by various interest groups to make it easier for their respective members to provide feedback reflective of the group's interest or position.
126	41	12100	The descriptions of Goals, Objectives, Standards, and Guidelines are technically correct, but should be re-stated in more positive terms to help increase public understanding and support for the amendment.	Comment noted.
109	8	12100	The maps presented in the DEIS do not show nearly as much affected land as the written descriptions--a major inconsistency.	The map provided in the printed DEIS was not of good quality. A clearer map was provided in the SDEIS and the FEIS. This is a programmatic decision, and maps with finer detail are
126	24	12100	Inadequate disclosure of information: Maps needed of Lynx habitat and	

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			Lynx Analysis Unit boundaries: Failure to include detailed maps of lynx analysis units across the region where the amendment will be implemented has limited the public's ability to understand the effects of the various alternatives and assess their adequacy. The Forest Service is obliged to correct this omission and provide these maps to the public.	used for site-specific analysis and planning. The mapping of habitat is an inventory of conditions present. The mapping protocol was and is included in Appendix F. The DEIS, SDEIS and FEIS all include a map of the known lynx habitat where this amendment applies.
126	5	12100	The geographic scope of the amendment needs clarification: It is unreasonable to expect the public to approach each individual national forest and other land managers to learn and evaluate where the amendment will apply. Previous maps obtained from separate land managers include significant discrepancies between how lynx habitat is mapped across jurisdictional borders.	
6/7; 74/4; 172/3; 176/3; 178/3; 180/3; 181/3; 183/3; 188/2; 189/2; 192/2; 194/2; 198/4; 201/3; 206/3; 229/7		12100	Provide the public detailed and regularly updated maps of where this amendment will be implemented, as the success of the amendment will depend upon the extent to which it is implemented in all areas important to lynx restoration.	The FEIS contains a map of where the amendment will be implemented.
200	2	12000	Please provide us with maps of where this work will be implemented so we may know of your successes.	
21	4	12100	It would also be helpful to supply maps to the public of where these plans are to take effect.	
205	1	12100	This document is loaded with acronyms and is not clear to readers. Table S-1 listing could be clarified to make the differences between objectives, standards and guidelines more clear. [Respondent asked] why [the FS is] trying to populate the area with lynx? How many lynx needed for viable population? How do snowmobilers truly effect lynx?	Comment noted, a list of acronyms has been added to the final document. Effects to various resources are discussed in the EIS in chapter 3.
109	13	12200	I am certain the general public has no idea this DEIS is out here. That is a fault of the system. The USFS had advertised it but the public and many of the overseers in the public and private sector seem to be unaware. The attendance at the public meetings has been very poor. People are not aware that the government can reach into their lives with a DEIS in such an invasive way. They will only find out later if you implement Alternative B, C, or D. It will be too late then.	Comment noted. The Forest Service published notices in the Federal Register and in newspapers, held meetings, and mailed documents to those who expressed interest. Information on the amendment has been available on the Rocky Mountain Regional website.
126	48	12600	We were surprised at the suddenness of this proposal, and only learned of it after the comment period was already underway, despite our proven	The amendment process began in spring 2002. Copies of the DEIS were made available to all parties who had responded

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			interest in this issue (co-plaintiffs in the ESA listing litigation, active member of the Western Forest Carnivore Committee, etc.). We would appreciate more advance notice in future of important developments like this one and others affecting forest carnivores in the northern Rockies.	to scoping at the same time via hard copy or CD (as requested) and via the website.
150	14	13000	The Forest Service should expressly identify where it is relying on CDOW data, where it is not, and why. This is particularly appropriate because the Forest Service has identified the Colorado Department of Natural Resources as a cooperating agency due to its "special expertise in respect to lynx in Colorado." DEIS at 1-2.	The citations to T.Shenk of the CDOW are noted in the wildlife section pertaining to lynx populations and distributions.
235	6	13000	[The state of] Colorado suggests that lynx management issues be held in abeyance by the Chief of the U.S. Forest Service until all Forest Plans and amendments can be considered together. This task can be accomplished in June, 2004, when teams from both the Southern and Northern Rockies Regions meet to integrate management direction for the Rocky Mountain region.	Comment noted. The teams from both the Southern and Northern Rockies worked together to ensure consistent direction between the Regions, with some slight differences due to habitat differences.
64	25	13200	We encourage the USFS to consult further with the FWS to develop management direction that effectively conserves and recovers lynx.	The FS has consulted with the FWS and will continue to consult with the FWS. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
64	3	13200	EPA recommends that the Forest Service pursue consultations with the U.S. Fish and Wildlife Service to resolve our concerns regarding the Preferred Alternative's compliance with the Endangered Species Act.	
75	2	13200	We urge you to take steps to ensure that the USFS and U.S. Fish and Wildlife Service closely coordinate their NEPA activities to complete this process in as timely a manner as possible. It is in the interests of both the species being protected and the regional economy that the agencies strive to perform their work concurrently, not in a staggered fashion.	
125	2	13200	It appears that you have total disregard of the findings of your sister agency in the Department of the Interior - the US Fish and Wildlife Service - the agency having the primary responsibility of designating critical habitat and developing a recovery plan for the lynx - and they have done neither.	The Endangered Species Act requires that federal agencies use their authorities to conserve threatened and endangered species. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. The conservation agreement established a process for mapping lynx habitat. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
236	1	13300	The [CDOW] has previously maintained, and I still believe, that uses of National Forests and lynx conservation must be in congruence with each other so as not to erode public confidence and support for lynx recovery in	Comment noted.

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			Colorado. Future activities can and generally should be permitted without excessive restriction, provided important habitats and corridors are protected.	
125	3	14000	Your grandiose statement that proposed amendments are equally applicable to all vegetation that "could contribute to lynx habitat" is ludicrous. In a document such as the Forest Service has drafted, the word "could" is what I call a weasel word - sort of like usually, rarely, frequently, may, etc. It can mean anything the author wants it to mean. It is not a quantifiable term and has no place in a quasi-legal document such as this. It is also interest that most, if not all, of the scientific (?) evidence for this amendment will be based on studies by the lynx biologists. With the documented fabrication and falsification of data collected by agency lynx biologists in Washington in 2002, it seems to me that there ought to be some oversight responsibilities mentioned in your document.	Lynx habitat, and the vegetation that contributes to it, is defined in the Glossary. The falsified samples were discovered and investigated, but had no bearing on this analysis or documentation.
126	45	14000	There is something contradictory when the Forest Service refuses to manage dispersed snowmobile use to protect lynx, yet at the same time justifies expanding designated routes to include areas of consistent dispersed use because the ecological effects on lynx are the same.	Comment noted. The effects of snowmobile use is discussed in the analysis.
126	40	14000	The distinction between the Forest Service's "proposed action" and "preferred alternative" should be better clarified up front, since it took some time before we realized that the proposed action was not the preferred alternative. This change in direction was bad news enough without it being a surprise.	The Notice of Availability of the DEIS and SDEIS, and cover letters accompanying the documents identified the preferred alternative as Alternative D. The proposed action from scoping, Alternative B, was one of the alternatives analyzed as required by the National Environmental Policy Act.
126	12	14000	The Forest Service changes various standards in the Proposed Action (Alternative B) to less-enforceable "guidelines," which means they will be implemented at the discretion of project-level decision makers.	Comment noted. The definition of guidelines, and the amount of discretion available, are provided in the Glossary.
221	3	14200	Why would the USFS prefer Alternative D even though it recognizes impacts on decreasing the "probability of lynx persistence?" Vegetative management standards VEG S5 and all of S2 in your own analysis "may lead to adverse effects" on lynx productivity, prey base, and landscape productivity. What are we to assume when you make this Alternative D recommendation? This looks like an open door for future activities in Region 2, despite impacts on lynx from recreation development, road building, commercial logging and fuel mitigation. This was a political decision that was not based on science.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
4	5	15000	The Forest Service should address lynx conservation issues in individual forest plan revisions and amendments after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan, as	A Regional approach was chosen in order to gain efficiency and consistency. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation

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			required by the Endangered Species Act.	
8/11; 146/11;	11	15000	I would strongly recommend that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
14	11	15000	The Board of County commissioners of Jackson County, Colorado would strongly request that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	Comment noted. The contiguous Forests in Region 2, including Colorado and southern Wyoming, are included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
82	3	15000	To preclude other management Goals and Objectives to Lynx Management Goals and Objectives is not in the best interest of the lynx, the public, or the forest and is in direct opposition of current Forest Service multiple use mandates. Individual Forest Plans and direction towards a Desired Future Condition should direct Lynx management. Lynx Management Objectives should not be allowed to supersede Forest Plan Objectives.	Forest Plan goals and objectives are not eliminated by adding additional goals and objectives for the protection of federally-listed species. It is the Forest Service's responsibility to ensure management actions comply with various laws, including the Endangered Species Act. Across National Forest System lands, not every acre can provide equally for every multiple-use. However, the overall intent is to provide for multiple-uses across the National Forest System lands.
95/28; 127/28	28	15000	The FEIS and ROD must specify the Fish and Wildlife Service if the proposed forest plan amendments are completed. If the FWS issues a Biologic Opinion supporting the amendments, then it seems appropriate that when projects are planned that are in compliance with the standards and guidelines, the FWS should concur with the Forest Service's BA on projects and not introduce new requirements or require additional consultation. Consistent with the Forest Service's intention to streamline	Comment noted. The Forest Service will continue to work with the FWS consistent with law, regulation and policy during project planning..

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			conformance with lynx requirements, any projects that are subsequently tiered to the amended forest plans should be able to proceed without reevaluation of lynx habitat or other requirements.	
95/26; 127/26	26	15000	In July 2003, the FWS issued a Notice of Remanded Determination of Status for the contiguous United States distinct population segment of the Canada lynx. The notice stated that for several of the risk factors identified in the LCAS, no evidence exists that they are a threat to lynx populations in the United States. The activities identified as not being a threat to populations of lynx were mining and grazing, unpaved forest roads, competition with lynx and other species, and packed snow trails. Because of this reevaluation, all of the standards addressing these risk factors in the LCAS were changed to guidelines in the preferred alternative. Several speculative statements (see page 18 i.e., "may lead to", "Even though there is no hard scientific evidence", "choose to err on the side of maintaining and restoring habitat for lynx and their prey", etc) are included in the DEIS in defense of these unwarranted, unnecessary Guidelines. If these activities are not a threat to populations of lynx, then the related standards, guidelines or other direction should be eliminated. There is no reason for direction for activities that do not constitute a threat to populations of lynx. The definition for Guideline in the Glossary states "Techniques or prescriptions that should be used to meet objectives; rationale for deviations must be documented" [emphasis added]. Based on that definition, the strong likelihood is that individual forests will implement the direction that is not necessary for protection or recovery of lynx populations. Some of the standards and guidelines are quantified and others are not. For example, Guideline HU G3 states - Recreation developments and operations should be planned in a way that both provide for lynx movement and maintain the effectiveness of lynx habitat.	Comment noted. For some items evidence is lacking to prove or disprove threats that were considered in the LCAS. The best available science was considered in the analysis. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
95/23; 127/23	23	15000	The DEIS does not address the "significance" of the proposed amendments. Considering that most of the affected forest plans have already been revised, that over 80% of the suitable lands are included in LAUs, that long-term growth and timber program outputs will be significantly curtailed, and that the direction will be in place for many years, the proposed amendments will clearly be "significant". The Forest Service must follow the prescribed process for making "significant" amendments to the forest plans.	An NFMA significance evaluation is included in the FEIS. Overall multiple-use direction in the existing Forest Plans would be maintained. Future actions may be limited, but opportunities would not be eliminated. The analysis discusses anticipated impacts for all alternatives considered, by affected resource area in Chapter 3.
109	14	15000	This DEIS causes a halt to multiple use management and replaces it not just with a single-use management philosophy. It replaces multiple use management with a single species management. This is in violation of the	Forest Plan goals and objectives are not eliminated by adding additional goals and objectives for the protection of federally-listed species. It is the Forest Service's responsibility to

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			National Forest Management Act, The Multiple Use and Sustained Yield Act, and the CFR 219 regs. Specifically you are to manage the land for multiple uses, not for single species. It is also in violation of the Renewable Resources Planning Act.	ensure management actions comply with various laws, including the Endangered Species Act. Across National Forest System lands, not every acre can provide equally for every multiple-use. However, the overall intent is to provide for multiple-uses across the National Forest System lands.
109	15	15000	This DEIS will cause implementation of the Healthy Forest Initiative passed in 2003 to be impossible because it will keep you from doing the fuels reduction treatments HFI requires.	Alternatives D and F include allowances for fuels treatments to proceed within wildland urban interface areas.
109	5	15000	The DEIS restrictions on timber management in Alternatives A, B, and C will cancel out the Healthy Forest Initiative. For example, the DEIS severely restricts thinning of lodgepole stands, which is an area of management that cannot be neglected any longer in Colorado and Wyoming. We need to thin our lodgepole stands because they will biologically "lock up" if they are not thinned in a timely manner. They will remain and become even worse fire fuel for lightning strikes or ignition methods.	Climax lodgepole pine stands, and other dry forest habitat types, that do not meet lynx habitat definitions as noted in Appendix F would not be restricted from precommercial thinning activities. These would be identified during site specific analyses.
117	1	15000	My main concern with this analysis is that it has not fully addressed or incorporated the President's Healthy Forest Initiative (HFI). Although the HFI is briefly acknowledged on p. 3-5 under Present Actions, this analysis has not incorporated the direction implied by the Item 4; which is to consider and balance the short term and long term effects of management or the lack of management on the lynx. This analysis should incorporate the spirit of that direction, much more strongly, especially since it is so closely tied to the purpose and need for this project.	Alternatives D and F specifically addressed HFI.
125	5	15000	Making this amendment apply to seven national forests appears to be out of character for the forest Service. It would seem to me that a more logical approach would be to amend the forest plan of the individual national forests, with the opportunity for public review and comment in each instance. Since there are such wide contrasts in these forests, the "one size fits all" approach just doesn't work.	Comment noted. The amendment was expanded to include all Forests in Colorado and the portions of the Medicine Bow-Routt National Forest in Wyoming to provide a consistent management approach to manage lynx habitat.
134	2	15000	NHES is strongly opposed to any weakening of Forest Service laws which are meant to protect wildlife- especially when the weakening of laws only serve to benefit the financial interest of corporate influences.	Comment noted.
135	3	15000	If the cats were to be released in the middle of our multi-use environment, with your studies focused only on how well they could adapt, most of us would have little problem with that. But in reality, once the release is made right in our backyard, and someone wants to build or otherwise function close to a release point or denning area, the Bureaucracy comes down on	Comment noted. The reintroduction of lynx is outside the scope of this analysis. This amendment is to ensure adequate guidance is in place for providing for lynx habitat while allowing multiple use management.

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			their head big time. First demanding a feasibility study, public hearings, followed with impact studies on cat habitat, the environment, along with a host of others I'm sure.	
149	8	15000	We are troubled by the Forest Service's refusal to include national forests outside the Rocky Mountain Region that are ecologically contiguous with those in the Region within the geographic scope of the analysis and Forest Plan amendment. See DEIS at Ch. 1 pp. 2-3. Lynx released in Colorado are known to have traveled, and may be residing, in northern New Mexico, and are thought to have at least traveled into Utah. As a consequence, land use activities authorized by existing forest plans may affect lynx and lynx habitat and those forest plans should be amended as part of this regional process to ensure that lynx and lynx habitat are adequately protected. In fact, some of the undersigned organizations are currently in litigation over just this issue regarding national forests in New Mexico. We urge the Forest Service to incorporate the Carson, Santa Fe, and Manti-La Sal National Forests into this amendment process. In lieu of including these areas in the current effort, the only alternative is for the Forest Service to immediately begin a separate amendment process for those three forests.	Region One of the USFS has completed Forest Plan amendments for lynx in the Utah National Forests that are considered to have viable lynx habitat. Lynx were not documented historically in New Mexico and the state of New Mexico does not consider lynx a native species in their state. The FWS listing package did not include New Mexico as within lynx range.
149	60	15000	The DEIS is further impaired to the extent that the FS is relying on the Fish and Wildlife Service's lynx remand decision. We defer to the discussion of this issue in the comment letter of Predator Conservation Alliance et al. (2004) on the Northern Rockies Lynx Amendment. This comment letter is attached as Exhibit 4, and we incorporate it in it's entirely.	Comment noted.
150	22	15000	CSCUSA urges the Forest Service to carefully review the 2003 Listing Decision, and update and revise the DEIS and the proposed standards and guidelines to incorporate the Fish and Wildlife Service's recent findings.	Comment noted. Updated information was reviewed and considered in the analysis for the FEIS.
64	79	15000	The White River National Forest will implement the equivalent of Alternative B ("very similar to the Proposed Action in this DEIS, page 3-3) as part of its already approved Revised Forest Plan. It will have more protective measures for lynx than other Forests, but its efforts may be compromised by the weaker protections in other Colorado National Forests. That potential impact on lynx in the White River National Forest should be evaluated as part of the cumulative impacts analysis in the Final EIS.	The White River NF has been added to the Southern Rockies Lynx amendment area as per direction from the Deputy Under Secretary's discretionary review decision rendered in December 2004. This will ensure consistent management direction in the Southern Rockies Amendment area. The best available information was considered in this analysis. A supplemental DEIS was released in 2006 and potential impact on lynx in the White River NF. Analyses of direct, indirect and cumulative effects are disclosed in chapter 3.
95/19; 127/9;	19	15000	The White River National Forest should have been included in the DEIS, just as the Medicine Bow, Routt, Rio Grande and Arapaho Roosevelt, the	

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			other Forests which have completed revision of their forest plans, were included. The forest plan for the WRNF should also be amended to update the direction for lynx management.	
150	29	15000	The Forest Services' apparent decision to propose one set of lynx management direction for the WRNF and different lynx management direction for the rest of the Southern Rockies threatens to undercut the agency's ability to efficiently manager lynx in all National Forests in the Southern Rockies based on the best available science.	
150	30	15000	The WRNF issued a July 7, 2000 press release stating that the Southern Rockies Lynx DEIS would address "cumulative environmental effects" of the WRNF lynx direction so as to provide an opportunity for public comment. Where does the DEIS disclose the environmental effects of the WRNF lynx direction, cumulative or otherwise? Where does the DEIS provide, as promised in the June 30, 2000 scoping notice, an opportunity to comment on lynx direction for the WRNF? How can this DEIS provide a meaningful opportunity to comment on lynx direction for the WRNF when the Forest Service has already selected lynx standards and guidelines for the WRNF in an April 2002 Record of Decision? Why was the WRNF lynx direction based solely on the LCAS? The DEIS wisely proposes additional flexibility for the rest of the Southern Rockies in Alternatives C and D. Why is that flexibility not available for the WRNF? The Forest Service should conform the lynx management direction for the WRNF to the lynx management direction it selects for other Colorado National Forests based upon this DEIS. Otherwise, potentially different (and unnecessarily more restrictive) lynx standards and guidelines will apply within the WRNF than apply elsewhere in Colorado. There is no reason to treat the WRNF differently than other Colorado National Forests.	
150	32	15000	The geographic boundaries between the DEIS and the WRNF lynx direction are unclear. Both the DEIS and the WRNF Final EIS state that Ski Cooper Ski Area is subject to the lynx direction under consideration in the different NEPA documents. Rather than decide which of two conflicting sets of lynx direction apply at Ski Cooper, the Forest Service should eliminate the source of the inconsistency and adopt consistent lynx direction for all Colorado National Forests.	Comment noted. The WRNF has been included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area.
158	8	15000	The proposed amendments are in direct conflict with provisions of the recently passed "Healthy Forests Act." The Forest Service should not proceed with the proposed forest plan amendments. Instead, the Forest Service should address lynx conservation issues in individual forest plan	Comment noted. The amendment was expanded to include all Forests in Colorado and the portions of the Medicine Bow-Rout National Forest in Wyoming to provide a consistent management approach. The FWS designated critical habitat

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			revisions and amendments, after the Fish & Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan, as required by the Endangered Species Act.	in 2006. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS. .
161	2	15000	There has been a lot of publicity in regards to the Canadian Lynx and the CDOW's efforts to introduce it into Colorado, but the bottom line is that the Canadian Lynx shouldn't be the determining factor in how we manage our Forest's. Our Forest's should be managed for the health of the Forest, first and foremost, consistent with President Bush's Healthy Forest Initiative.	Comment noted.
173	1	15000	We strongly recommend that the Forest Service not proceed with the amendment process. The proposed amendments are premature and inappropriate since the US Fish and Wildlife Service has not yet designated critical habitat or developed a Recovery Plan.	The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
173	2	15000	We strongly recommend that the Forest Service not proceed with the amendment process. The proposed restrictions on pre-commercial thinning will have much more significant effects on the long-term management, outputs and health of the national forests than are analyzed or disclosed in the DEIS. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on pre-commercial thinning significantly reduce the growth of saw timber, and contribute to long-term risks of insects, disease and fire. Further, the analysis of associated environmental, social and economic consequences is either missing or totally inadequate.	Comment noted. The economic and social effects section has been revised. Narratives addressing recreation, timber, and fuels reduction have been added. An NFMA significance evaluation was completed and is documented in the FEIS. Overall multiple-use direction in the existing Forest Plans would be maintained. Future actions may be limited, but opportunities would not be eliminated. The analysis discusses anticipated impacts for all alternatives considered, by affected resource area in Chapter 3.
230	4	15000	Throughout this document you refer to the "persistence" of lynx. It is not clear how the Forest Service defines the term. Does this mean maintaining the population at the current level? This language is troubling since under the Endangered Species Act (ESA) the Forest Service has an obligation to contribute to the recovery of the lynx. The word persistence does not commit to an increase to the lynx population. We believe the document should discuss the impacts to the population in defined terms and the goal should be a viable population inhabiting all of their historic range in the national forest.	The viability analysis is included in chapter 3 of the FEIS.
230	7	15000	The "All S2" standard allows projects that deviate from the standards to move forward without amending the plan. We do not see the value in this exemption for lynx conservation. In fact, on page 44 you acknowledge that this exemption reduces the effectiveness of the standards. this section	All S2 is incorporated into Alternative D. The remaining alternatives do not include this measure. In response to comments on the DEIS, Alternative F was developed that does not include this item. The Forest Service consulted with

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			also states the exceptions could adversely affect individual lynx as well as Southern Rocky Mountains Geographic Area (SRMGA) population. As stated on page 1 of the summary, the purpose of this amendment is to provide direction for the conservation and promotion of lynx recovery. It seems this exemption is in conflict with the overall purpose of this amendment and the exemption should be eliminated. Similar to the "All S1" exemptions, the cumulative impacts of projects allowed under the "All S2" exemption have not fully analyzed the impacts as required NEPA.	the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
230	5	15000	We are concerned about the "All S1" standard. In particular, we are concerned about the activities that are exempted from this standard. The impacts of these uses (wildland fire, fuel treatments, fossil fuel exploration and development, and energy transmission lines) have not been fully analyzed and disclosed in the DEIS as required by NEPA.	Individual projects have not been proposed to allow full analysis of unknown proposals. The amendment direction provides programmatic direction. Analysis assumptions are noted in the respective resource sections in Chapter 3 and summarized in Table 2-3.
235	8	15000	The United States Fish and Wildlife Service is under court order (Defenders of Wildlife, et al. v. Gale Norton, et al., Civil Action No. 00-2996 (GK), December 26, 2002) to prepare a draft rule designating critical habitat to be published in the Federal Register in November, 2005, and implemented by final rule in November, 2006. these amendments and the Forest Plans they amend, plus the White River Forest Plan, will all serve as supporting documentation for the ultimate designation of critical habitat. [The state of] Colorado must raise the concern that any management direction defined and adopted in the current process of amending forest plans can potentially serve as a precursor to the delineation of critical habitat. By means of this comments process, Colorado must put the U.S. Forest Service and the U.S. Fish and Wildlife Service on notice that any designation of critical habitat which occurs as a default to the management direction defined in these amendments will meet with serious objection unless such designation is backed by strong scientific rationale.	Comment noted. The amendment was expanded to include all Forests in Colorado and the portions of the Medicine Bow-Routt National Forest in Wyoming to provide a consistent management approach to ensure adequate regulatory mechanisms are in place. The FWS designated critical habitat in 2006. NFS lands were not included due to following the conservation agreement. All forests in the amendment area have confirmed lynx sitings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. The FWS development process for a Recovery Plan is outside the scope of this analysis. The best available science was considered in both efforts.
235	5	15000	The separate consideration of these Lynx Amendments apart from the management planning for the White River Plan creates serious problems for the U.S. Forest Service and for the Colorado Division of Wildlife. Confusion could quickly overtake management decisions for the same population of lynx roaming between the White River and any other National Forest in the Southern Rockies.	Comment noted. The WRNF has been included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area.
239	13	15000	For [Colorado] State Parks within Lynx habitat areas, and for those directly adjacent or that are in holdings in federal land, development staff should realize that a biological assessment and a letter of concurrence from the	Comment noted.

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			USFWS may be necessary before any new development projects or trails.	
246	25	15000	The Medicine Bow National Forest Land and Resource Management Plan was revised on December 29, 2003, and incorporated lynx conservation measures. Please explain why the Medicine Bow National Forest Plan will be amended by the proposed Canada lynx amendment.	Comment noted. The Medicine Bow Forest Plan has been included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area.
8	2	16000	The Fish and Wildlife Service (FWS) has stated, "In the... Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population". Despite acknowledgements in the DEIS that many of the included areas have always been marginal lynx habitat, it is proposed to implement forest plan direction for the national forests in Colorado and southern Wyoming as though those national forests contain valuable habitat for the conservation of lynx. Based on the above-stated concern, I would strongly recommend that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	Comment noted. The contiguous Forests in Region 2, including Colorado and southern Wyoming, are included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
14	2	16000	The Fish and Wildlife Service (FWS) has stated, "In the... Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population". Despite acknowledgements in the DEIS that many of the included areas have always been marginal lynx habitat, it is proposed to implement forest plan direction for the national forests in Colorado and southern Wyoming as though those national forests contain valuable habitat for the conservation of lynx. Based on the above-stated concern, the Board of County commissioners of Jackson County, Colorado would strongly request that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	Comment noted. The contiguous Forests in Region 2, including Colorado and southern Wyoming, are included in this amendment to ensure consistent management direction in the Southern Rockies Amendment area. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
95/27; 127/27	27	16000	The DEIS does not specify what process would be used to determine whether a guideline is or is not being complied with during project	Site specific project analysis is required as per NEPA. The biologist analyzing a given project will provide the information

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			planning. For example, who would make the determination that a proposed recreation development is not affecting habitat connectivity or habitat effectiveness?	to the FWS in consultation efforts.
125	1	16000	The DEIS is replete with off-the-wall amendments with little or no documentation or scientific support. In fact, in several instances, there is conflicting science.	The best available information was considered and referenced where appropriate. There are areas of disagreement and those are acknowledged.
126	11	16000	The Forest Service re-words a standard in Alternative B to protect lynx from snowmobiles and other winter recreation to allow an increase in designated snowmobile routes and play areas within "baseline areas consistent snow compaction" (DEIS, p.29). The Forest Service provides no data to justify this change: it does not explain how these "baseline areas" were monitored or mapped, nor does it include maps of these areas in the DEIS for the public to evaluate the effects of this expanded snowmobile use.	The measure was reworded as a clarification to acknowledge the existing areas of compacted snow as part of the baseline effects. The mapping of these areas is identified as a follow-up item.
126	4	16000	The geographic scope of the amendment needs clarification: we urge the Forest Service to include in its record of decision detailed maps of where this amendment will be implemented, since the success of the amendment will depend on the extent to which it is implemented in all areas important to lynx restoration.	The map provided in the printed DEIS was not of good quality. A more clear map was provided in the SDEIS and will be provided in the FEIS. A larger scale map was available on the website. Due to changes in vegetation (e.g. insect caused mortality) there may be temporal changes in habitat use, however, the area identified in the FEIS map is where the amendment will apply.
126	31	16000	The FWS remand decision was focused on whether various threats to lynx were known to be significant enough to increase lynx protections from threatened to endangered; it did not address whether these threats should be addressed or ignored by the Forest Service in the northern Rockies. Whether or not we agree with the FWS remand decision, it is clear that the Forest Service used the FWS remand decision out of its appropriate context when citing it in the Lynx Amendment DEIS to justify deviating from the Proposed Action (Alternative B).	The Forest Service consulted with the FWS to ensure the amendment would provide adequate regulatory mechanisms for providing lynx habitat.
126	22	16000	The Forest Service failed to analyze and alternative that provided lynx protections above and beyond what is described in the Proposed Action (Alternative B), despite detailed scientific information submitted during the scoping period that justified stronger protections. Our organizations went to considerable effort to compile scientific information on lynx and relate it to the Proposed Action, and while we were largely supportive of the Proposed Action we also identified many areas where the Proposed Action fell short of meeting management recommendations from published scientific studies.	The Forest Service consulted with the FWS to ensure the amendment would provide adequate regulatory mechanisms for providing lynx habitat.

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146	2	16000	The Fish and Wildlife Service (FWS) has stated, "In the... Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population". Despite acknowledgements in the DEIS that many of the included areas have always been marginal lynx habitat, it is proposed to implement forest plan direction for the national forests in Colorado and southern Wyoming as though those national forests contain valuable habitat for the conservation of lynx. Based on the above-stated concern, I would strongly recommend that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish and Wildlife Services designates Critical Habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	Comment noted. This amendment effort provides consistency within all the Forests in the Southern Rockies areas to ensure consistent application. The Forest Service consulted with the FWS to ensure the amendment would provide adequate regulatory mechanisms for providing lynx habitat. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS
150	34	16000	CSCUSA is concerned that the Forest Service continues to endorse the snow compaction hypothesis when it has been rejected by the Fish and Wildlife Service and lacks any support. We are not aware of any reason to conclude that the hypothesis is supported by CDOW lynx reintroduction data. In this context, the Forest Service's continued treatment of an untested hypothesis as scientific fact is arbitrary and lacks a rational basis.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
202	3	16000	The EIS is very speculative in nature, and is attempting to incorporate major management changes on our national forests in the absence of facts. Two examples of this are as follows: 1) "Even though there is no hard scientific evidence that snow compaction can lead to increases competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend that agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey"; [and] 2) "We know little about the degree of connectivity or its role in the viability of lynx, but assume that connectivity plays an important role." The draft EIS is attempting to restructure an artificial environment for species (lynx) that we acknowledge to be "low-density." In fact, there is no historic evidence to support the hypothesis that Colorado ever had an extensive lynx population, yet the draft EIS proposes managing vast tracts of land specifically for lynx, whether lynx are or habitat for snowshoe hares and red squirrels, when there is little known about these animals. It is usually prudent to establish baseline information before implementing a series of	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx

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239	8	16000	<p>changes if you hope to achieve a specific outcome.</p> <p>I have formed the opinion that the evidence for groomed trails creating a situation where other predators are significantly competing is not definitive and not 'hard science' at this point. There are many compacted trails leading from lower elevations (like ponderosa pine communities), to higher elevations (in the spruce/fir, lodgepole zones) that various other predators such as coyote, fox, bobcat can use those trails to compete with lynx for snowshoe hare, squirrel and other prey items. Biologists I spoke with talked of anecdotal information to support this relationship in some situations, primarily from coyotes being seen using these groomed trails and being seen in higher elevations than expected. They suggested that there is little doubt that coyotes use these groomed trails, but questions exist in terms of how far off the groomed trails the coyotes venture, and how much impact that has on lynx.</p>	<p>habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent or their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).</p> <p>In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.</p> <p>The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.</p> <p>If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.</p>
211	3	16000	<p>The CWF also is concerned about the manner in which effects are described in the DEIS: The statement in the DEIS that "effects can be a</p>	<p>Comment noted.</p>

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			critical factor in the persistence of the population", is confusing, non-committal, and subject to individual interpretation.	
211	10	16000	The CWF is concerned that unqualified individuals could make effects determinations based upon either inappropriate information or short-term adverse effects with a temporal lag in beneficial effects, which could outlive the institutional memory of the USFS. In the future, the USFS could allow other management activities in the same area, thereby negating any beneficial lag effect that should have been realized from the original action. For example, since there is a long temporal lag between vegetation treatment and the development of beneficial effects, forest planning could change and negate the possibility of the beneficial effects.	Comment noted. The USFS will continue to consult with the FWS as required.
211	5	16000	The CWF also is concerned about the manner in which effects are described in the DEIS: The CWF would like to know the baseline to which the effects being compared. We are concerned that a true evaluation of the alternatives is lacking due to the manner in which the effects have been described. The USFS needs to clearly define the impact of the effects and to evaluate each alternative on its own merit.	Comment noted.
224	4	16000	I met with many in the Colorado Timber Industry who support Lynx recovery but only after future conditions are scientifically established. A narrow set of alternative plans with lynx priorities is not planning.	Comment noted. This amendment is programmatic in nature and does not include site specific project actions. The Forest Service consulted with the Fish & Wildlife Service to ensure adequate regulatory mechanisms would be in place with this amendment.
235	11	16000	[The state of] Colorado expects precise definitions so that management direction can be executed with clarity. Of particular concern is the confusion raised by the definition of "Lynx Habitat", wherein primary elevations are set at 8000-11,500 and later references (Appendix F-Procedures for Lynx Habitat and Lynx Analysis Unit Mapping) indicate "lynx occurrences generally are found only above 4,000 feet elevation...Areas below 4,000 feet usually should be excluded." The picture is clouded even more so in item 2, Appendix F by a statement which establishes yet a third elevation category: "Note that elevation ranges are specified in the geographic area descriptions in the Lynx Conservation Assessment and Strategy. (8000 to 12,000 feet in the Southern Rockies). This imprecision could lead to confusion and consequences which could compromise public and private land use once critical habitat is designated. Colorado suggests that the definition stay constant at the 8000-11,500 foot level, and that all extraneous and confusing elevation references be eliminated.	Comment noted. This has been reviewed and corrected for the appropriate information for the Southern Rockies area. The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.

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238	2	16000	According to the DEIS, the proposed amendments will not include site-specific decisions about what lynx habitat is or where it is located, nor will it include decisions about linkage-area boundaries. Without a decision about the location and extent of lynx habitat and linkage boundaries, the Forest Service is simply not in a position to accurately analyze and describe effects.	The mapping of habitat is an inventory of conditions present. The mapping protocol was and is included in Appendix F. The DEIS, SDEIS and FEIS all include a map of the known lynx habitat where this amendment applies.
246	47	16000	Standard VEG S4. Standard VEG S4. [The DOI] support[s] VEG S4 Conditions 1,2,3, and 4 under Alternatives B and C. However, the defensible fuels profiles language should be deleted from exemption in Alternative C. The defensible fuels profiles language is too vague, and could be applied to any vegetation management action, anywhere on a forest, and at any time. The Forest Service should explain how implementation of this exemption, and the effects that will result, compare to historical disturbance regimes.	Comment noted.
246	48	16000	Standard VEG S4. Standard VEG S4. [The DOI] support[s] VEG S4 Conditions 1,2,3, and 4 under Alternatives B and C. However, the defensible fuels profiles language should be deleted from exemption in Alternative C. The defensible fuels profiles language is too vague, and could be applied to any vegetation management action, anywhere on a forest, and at any time. The Forest Service should establish sideboards for implementation of this exemption to maintain viability and provide for recovery of lynx within the SRMGA.	Comment noted. Individual analyses would discuss the location and purpose of treatments to create defensible fuels profiles in context with the landscape setting of concern. This language was not included in Alternatives A, B, D or F.
126	34	16100	Even if the FWS remand decision had discounted various threats to lynx across the board, the FWS remand decision should not take precedence over other scientific information on lynx, such as the LCAS and subsequent FWS Biological Opinion on the LCAS, for example, because the remand decision was never published in a peer-reviewed scientific journal. The FWS remand decision provides no new scientific evidence regarding lynx conservation status and needs, it is simply an analysis of existing scientific information in response to a court order to consider increasing lynx protections in the lower 48 states. The Forest Service provides no explanation for why it favors this document written by one FWS biologist over another document co-authored by 13 lynx biologists, seven of which are employed by the Forest Service itself.	Comment noted. The best available information was considered for this analysis. Alternative B included direction for lynx in the form of standards for the majority of the factors identified in the LCAS. Alternatives varied in application of standards and guidelines. Some items identified as standards under Alternative B were changed to guidelines for other alternatives in the development of a range of alternatives. Although guidelines may be waived based on site specific analysis, the intent is to follow the guidelines where possible.
126	33	16100	For the Forest Service to maintain that some threats to lynx may harm individual lynx, but do not threaten populations as it claims in many places in the DEIS, and for the Forest Service to consequently approve any actions that may harm individual lynx, the Forest Service must provide	Threats, potential effects, and cumulative effects were evaluated in detail in the FEIS (See Wildlife Section in Chapter 3). As defined by ESA, the term "conservation" means to use all methods and procedures to bring any

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			peer-reviewed scientific data that population-level impacts will not occur. We know of no such evidence for the lynx or other species where they exist at similarly low numbers and with a similarly low reproductive rate.	
64	5	16110	We are concerned about the lack of cumulative impacts analysis and disclosure in the DEIS. The LCAS addressed cumulative effects of all potential actions that could adversely affect the lynx and other species and resources. The DEIS did not evaluate nor disclose the cumulative effects on lynx habitat, populations, and sub-populations for many proposed activities which will negatively affect individual lynx but are stated to not likely affect the population or the recovery of the overall population. If management direction will lead to adverse impacts to individual lynx, it is difficult to understand the Forest Service's conclusion that management direction will lead to lynx restoration and recovery. We propose additional discussion of direct, indirect, and cumulative impacts in the Final EIS regarding the effects on all resources and species that would be affected by alternatives.	endangered species or threatened species to the point at which the measures provided under ESA are no longer needed (16 U.S.C. 1532). The term "conservation" does not apply to individuals. The goal of the management direction is to provide for persistent populations of lynx over time.
149	18	16100	ALL S2. The FS fails to provide any biological basis for this exception, any clear estimate of or parameters on the frequency with which it will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of its use. Without extensive analysis of these considerations, and the inclusion of biologically defensible parameters on its use, the FS cannot include such an exception in the lynx amendment.	Comment noted. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
2	8	16110	Regarding lynx protections and recovery, please consider the following: The management provisions outlined in the Lynx Strategy should be adopted as standards, which are required, not as discretionary guidelines.	Comment noted. Alternative B represents the management direction most closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS Alternative B represents the management direction most closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
2	1	16110	I am writing to urge you to provide the strongest possible protection for lynx in the Southern Rockies by adopting all of the Lynx Conservation Assessment and Strategy recommendations.	Comment noted. Alternative B reflects the LCAS.
3	2	16110	For the successful repatriation of this charismatic cat to the ecoregion, the USFS must include language in its final plan that will secure real	Comment noted. Alternative B reflects the LCAS.

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			protection for the species and its habitat. Adopt as standards those management provisions recommended in the Lynx Strategy.	
8	4	16110	The Lynx Conservation Assessment and Strategy (LCAS) on which the proposed amendments are based, is a self-described "conservative approach" to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan Goals and Objectives, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of preserving the overall multiple-use direction in existing forest plans, or the requirements of the Organic Act or National Forest Management Act.	Comment noted.
122	5	16110	The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the Desire Future Condition. The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the Lynx Conservation Assessment and Strategy, with only slight variations, despite the fact that, according to the FWS, the potential for lynx in Colorado has always been "limited" and that "the most likely cause for the loss of resident lynx in Colorado was a natural process".	Comment noted. The Vegetation standards and guidelines indirectly state the desired future condition for lynx habitat. For example, VEG S3 directs that at least 10% of the habitat should be in denning habitat (typically old growth structural stage) and well-distributed. VEG S1 directs that no more than 30% of the habitat should be in the very early seral stages (seedling/stand initiation stage).The best available information was considered in the development of the proposed action. New information and issues from scoping were used in the development of alternatives. Alternative F was developed between the DEIS and the FEIS to incorporate updated information.
8	5	16110	The proposed amendments were clearly designed solely for conservation and recovery of lynx, and without consideration of "overall multiple use objectives" of the affected forest plans. Because the Forest Service has proposed to incorporating, nearly word for word, the recommendations from the LCAS, it is my opinion that the proposed amendments will not be consistent with overall multiple use objectives or preserve overall multiple use direction.	Comment noted. The analysis relays the anticipated effects to various resource areas of providing lynx habitat direction that would provide adequate regulatory mechanisms for lynx.
14/5; 146/5	5	16110	The proposed amendments were clearly designed solely for conservation and recovery of lynx, and without consideration of "overall multiple use objectives" of the affected forest plans. Because the Forest Service has proposed to incorporating, nearly word for word, the recommendations from the LCAS, it is this Board's opinion that the proposed amendments will not be consistent with overall multiple use objectives or preserve overall multiple us direction.	Comment noted. The analysis relays the anticipated effects to various resource areas of providing lynx habitat direction that would provide adequate regulatory mechanisms for lynx. A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
14/4; 146/4; 158/5	4	16110	The Lynx Conservation Assessment and Strategy (LCAS) on which the proposed amendments are based, is a self-described "conservative	

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			approach" to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan Goals and Objectives subservient to lynx Goals and Objectives, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of preserving the overall multiple-use direction in existing forest plans, or the requirements of the Organic Act or National Forest Management Act.	
95/6; 127/6	6	16110	The Lynx Conservation Assessment and Strategy (LCAS) on which the proposed amendments are based, is a self-described "conservative approach" to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan Goals and Objectives subservient to lynx Goals and Objectives, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of multiple-use direction in existing forest plans, and the requirements of the preserving the overall Organic Act and National Forest Management Act.	
64	21	16110	We recommend that the LCAS be followed [because] deviation from mandatory Standards is likely to make all Standards less meaningful in practice and cumulatively affect the LAUs.	Comment noted. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
64	20	16110	We recommend that the LCAS be followed to reduce the cumulative impacts noted in Alternative D. EPA agrees that it is difficult to analyze cumulative effects associated with the numerous activities that would be allowed to occur and potentially cause adverse impacts to lynx, other species, and natural resources and vegetation.	
64	19	16110	We recommend that the LCAS be followed to better support lynx conservation and recovery.	
64	2	16110	Adherence to the programmatic biological opinion and the Lynx Conservation Assessment and Strategy (LCAS) should effectively remove most threats to lynx recovery on Federal lands. Accordingly, management direction on Federal lands generally should adhere to the LCAS conservation measures. The Preferred Alternative deviates from the LCAS without providing the scientific data and information to demonstrate that it can lead to the lynx's conservation and recovery in the Southern Rockies.	
74	1	16110	I believe that the [FS] should base their final plan on the [LCAS], or "Lynx Strategy" - a collaborative set of management recommendations made by government and academic lynx biologists.	
126	36	16110	The Forest Service analysis should focus on the FWS biological opinion on the LCAS: Departure from the terms and conditions established in the FWS biological opinion requires re-initiation of formal consultation	

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			between the two agencies on this amendment.	
126	37	16110	The Forest Service analysis should focus on the FWS biological opinion on the LCAS: If the Forest Service amendment that results falls short of fully addressing the "inadequacy of existing regulatory mechanisms" that was the basis of the lynx listing, consultation must be initiated with the FWS on all project-level decisions that may lynx.	
126	85	16110	We are concerned that the LCAS and amendment do not go far enough to ensure that lynx will adequately protected from the cumulative effects of all human developments and activities within a given LAU. We are also concerned that the LCAS fails to ensure adequate monitoring of lynx within the LAU's, to determine if the strategy is working to recover lynx or if more protections are needed.	
126	52	16110	We appreciate much of the language in the proposed amendment, but are concerned that: (2) the standards within the LCAS may not be adequate to recover the lynx.	Comment noted. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
126	51	16110	We appreciate much of the language in the proposed amendment, but are concerned that: (1) the proposed amendment departs from the LCAS in significant cases.	
126	26	16110	Inappropriate use of the FWS remand decision (USDI 2003): Remand decision supports full implementation of the LCAS (Alternative B). The Forest Service misrepresents the FWS remand decision by failing to acknowledge the many instances where it assumes and supports full implementation of the Lynx Conservation Assessment and Strategy (LCAS), the "Proposed Action" also labeled Alternative B.	
148	8	16110	It is a national tragedy when the informed, reasoned conclusions of a document like LCAS are misrepresented in deference to the short-sighted and selfish agenda of Alternative D.	
126	59	16110	The LCAS standard to prohibit any further reduction of suitable habitat in LAU beyond 30% appears to have been qualified to allow for further reduction in areas where historical conditions were different.	Comment noted.
126	58	16110	LCAS direction to maintain and restore connectivity between lynx analysis units (LAU's) is qualified in the amendment with the word, "where necessary and feasible." This qualification goes without saying, and invites unnecessary subjectivity into the process, so it should be omitted from the proposed amendment.	Comment noted.
126	57	16110	The proposed amendment changes an LCAS grazing "standards" to an "objective," thereby making it harder to implement and enforce. The	Comment noted. Direction for grazing management is provided in standards under Alternatives B and C and

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			standard has to do with maintaining vegetation in mid-to high seral condition in riparian areas within lynx range.	guidelines under Alternatives C, D and F. No standards from Alternative B were changed to objectives under the other action alternatives considered in the amendment. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
126	15	16110	Alternative E's failure to fully address all of the threats to lynx identified in the LCAS indicates that consultation must be initiated with the U.S. Fish and Wildlife Service for all project-level decisions that may affect lynx within the Rockies region to provide the additional guidance needed to ensure those projects will promote lynx restoration, an approach that is far more costly and probably less effective than providing adequate guidance at the regional level in this amendment.	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
145	4	16110	The [LCAS], on which the proposed amendments are based, is a self-described "conservative approach" to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan goals and objectives subservient to lynx goals and objectives, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of presenting the overall multiple-use direction in existing forest plans, or the requirements of the Organic Act or National Forest Management Act. The proposed amendments were clearly designed solely for conservation and recovery of lynx, and without consideration of "overall multiple use objectives" of the affected forest plans.	Comment noted. The analysis relays the anticipated effects to various resource areas of providing lynx habitat direction that would provide adequate regulatory mechanisms for lynx.
156	2	16110	By basing your proposed amendments on the [LCAS], you are not giving the public the opportunity to review and comment on what constitutes lynx habitat or how they are identified. I realize that lynx biologists are "experts" in their field of study, but that really does not mean they know what they are talking about. For example, until one of the transplanted lynx in Colorado was shot in Nebraska, the "experts" believed a lynx would not cross any opening greater than seventy-five feet. This is ludicrous and I believe that many other theories (guesses?) that these "experts" put forth are equally dim-witted. They are, many times, based on subjective assumptions rather than objective study.	Comment noted. Appendix F, included in the DEIS and SDEIS outlined the scientific process the forests used to determine lynx habitat. The resulting mapping was an inventory of habitat. During site specific analyses the public can inform affected units of habitat conditions they are aware of that should be considered for those analyses. This amendment was undertaken to provide programmatic direction. Site specific analyses would provide an opportunity to update habitat information based on conditions present at that time.
177	2	16110	We support the science in the 1999 "Ecology and Conservation..." and	Comment noted. Alternative B reflects the LCAS. Alternative

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			2000 LCAS documents.	
229	6	16110	Please adopt the Lynx Conservation Assessment and Strategy as the standard for the management provisions of the lynx management plan.	D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol. 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
150	6	16110	CSCUSA appreciates that the DEIS does not simply propose lynx standards and guidelines based strictly on the LCAS as the WRNF did in its 2002 Final EIS for the WRNF. That would be short-sighted because the LCAS was originally drafted in 1999. Since then, the Forest Service, the United States Fish and Wildlife Service, and the Colorado Division of Wildlife have learned significant information about lynx to improve upon what was known in 1999, particularly in the Southern Rockies. That information tends to show that lynx are more adaptive, resilient, and capable of coexisting with human uses of National Forests, including managed recreation, than was assumed in 1999.	
198	1	16110	You have listed Canada lynx as Threatened under the Federal [ESA] in March of 2000 and as a result they are required to adopt a lynx management plan intended to protect both lynx and lynx habitat. You should base the plan on the [LCAS], or "Lynx Strategy" for short - a collaborative set of management recommendations made by government and academic lynx biologists.	Comment noted. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol. 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
208	1	16110	There are no research findings which indicate that grazing, mining, forest roads and over-the-snow activities do not pose a threat to lynx populations - at best, it is unknown whether these activities are a serious threat. The recommendations of the LCAS should be the management guidance followed until published, peer-reviewed findings indicate otherwise.	
229	1	16110	I am very disappointed that the proposed lynx management plan does not fulfill any of the requirements of the Lynx Conservation Assessment and Strategy. A management plan that has no scientific basis, or which contravenes the Forest Service's and the government's own management strategies, is a waste of the taxpayer's money and will just need to be redone.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
238	5	16110	In July 2003 the FWS issued a Notice of Remanded Determination of Status for the contiguous US distinct population segment of the Canada lynx. The notice stated that for several of the risk factors identified in the LCAS, no evidence exists that they are a threat to lynx populations in the [US]. The activities identified as not being a threat to populations of lynx were mining and grazing, unpaved forest roads, competition with lynx and other species, and packed snow trails. Because of this reevaluation, all of the standards addressing these risk factors in the LCAS were changed to	

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			guidelines in the preferred alternative. If these activities are not a threat to populations of lynx, then standards, guidelines or other direction should be eliminated. There is no reason for direction for activities that do not constitute a threat to populations of lynx. The definition for guideline in the Glossary states "Techniques or prescriptions that should be used to meet objectives; rationale for deviations must be documented". Based on that definition, the strong likelihood is that individual Forests will implement the direction that is not needed because they are forest plan guidelines and deviations are allowed only with documentation for each and every project.	
235	7	16110	The White River Plan virtually followed the Lynx Conservation Assessment and Strategy (LCAS), which aligns it with Alternative B in the current plan amendments, thus limiting overall flexibility. Once a management direction is determined for the other forests in the Southern Rockies, it might be best to wait on the White River Plan and align it accordingly.	The White River National Forest was incorporated into this amendment effort with the SDEIS as per direction from the Deputy Undersecretary discretionary decision in December 2004.
115	4	17400	Professionals, outside the pressures of agency deadlines and influence, should be a part of the formulation and review of this DEIS amendment.	Comment noted.
64	94	20000	The DEIS Alternatives are complex and the document is difficult to understand and interpret. Acronyms are used to describe all of the Standards and Guideline, and those same acronyms have different meanings depending on the Alternative. The public and decision-makers may have difficulty fully understanding the Alternatives and the differences among the Alternatives.	The FEIS includes a list of acronyms. Language presented in the alternatives has been reviewed and clarified where noted as a concern.
64	52	20000	Cumulative effects were not fully evaluated for lynx populations and sub-populations across the Southern Rockies. The Final EIS should discuss all risk factors for the lynx and demonstrate how the alternatives will contribute to the conservation and recovery of the lynx.	Cumulative effects are discussed in Chapter 3. The Forest Service consulted with the FWS to provide lynx habitat direction to ensure adequate regulatory mechanisms are in place.
64	17	20000	The ALL S2 Standard makes cumulative impacts analysis more difficult, and consistent FS evaluation and application of the Standard will be problematic in future NEPA actions.	Comment noted. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
64	85	20000	The seven exceptions and five additional situations under VEG S5 need to be better defined to indicate the acreage that may be involved. How many acres may be involved in research studies and genetic tests?	Comment noted. The exceptions were noted to address other multiple use items. It is unknown how many acres may be proposed for research studies and genetic tests.
78	4	20000	For the benefit of the lynx, other forest wildlife and the citizens of Colorado and Wyoming who value their natural surroundings, I urge the Regional Forester to adopt Alternative B with the following change: All management provisions outlined in the Lynx Strategy should be adopted as standards,	Comment noted.

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			not some as standards and some as guidelines.	
78	1	20000	I am writing to support the adoption of Alternative B and the fullest possible implementation of the Lynx Conservation Assessment and Strategy (LCAS) recommendations for all of USDA Forest Service Region 2. For the last 12 years, I have worked on conserving habitat and landscape linkages for lynx and other threatened and endangered species on the White River National Forest and was very heartened with the White River adopted significant lynx conservation measures as part of its revised Forest Plan.	Comment noted.
79/2; 207/2	2	20000	Pg S-17, Probability of lynx persistence. How come none of the alternatives actually increase the probability of lynx persistence in the forest? If I am understanding the alternatives and the purpose and need statement correctly, the two seem to be somewhat contrary to each other rather than supportive. It appears that the alternatives are focused on what activities the FS will be exempt from rather than how the activities will benefit the lynx.	Comment noted. The Forest Service is a multiple use management agency that provides habitat for wildlife as well as resource management for other uses. The Forest Service consulted with the FWS to provide lynx habitat direction to ensure adequate regulatory mechanisms are in place.
81	1	20000	I do not support the Forest Service's proposed forest plan amendments for the Routt, Rio Grande, Pike San Isabel, Arapaho Roosevelt, GMUG and Medicine Bow National Forests. The proposed Lynx Management Direction will have significant, long-term effects on forest management, and most importantly forest health.	Comment noted. An NFMA significance evaluation was completed and is documented in the FEIS. Overall multiple-use direction in the existing Forest Plans would be maintained. Future precommercial thinning actions may be limited, but opportunities would not be eliminated. The analysis discusses anticipated impacts for all alternatives considered, by affected resource area in Chapter 3.
82	4	20000	The DEIS considers only a limited number of alternatives, all of which are based upon the [LCAS]. It does not contain alternatives based on the wide range of other considerations that should be included as a basis for determining a Desired Future Condition of each individual Forest. Since other concerns are not addressed the Forest Service should not proceed with the proposed amendments. After designation of Critical Habitat, and completion of a Lynx Recovery Plan by the U.S. Fish and Wildlife Service, as required by the Endangered Species Act. Lynx conservation issues should be addressed with individual forest plan revisions or amendments. Sound forest management can be used to create, promote, or enhance lynx habitat, but lynx recovery objectives do not necessarily coincide with forest management. Forest management decisions should include lynx habitat, but not dedicated by it.	The proposed action was based on the LCAS. A range of alternatives was developed based on the issues and public comments. The Forest Service has a responsibility to conserve listed species and it is not necessary to wait until designation of Critical Habitat or completion of a Lynx Recovery Plan. The best available information including a Recovery Plan Outline was used in developing this EIS.
122	3	20000	The proposed amendments do not offer an opportunity for public review and comment on what constitutes lynx habitat, where linkage area	Comment noted. Appendix F, included in the DEIS and SDEIS outlined the scientific process the forests used to

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			boundaries are located, or how they are identified. Further, the proposed amendments are equally applicable to all vegetation that "could contribute to lynx habitat", as mapped by lynx biologists, despite acknowledgement by the US Fish & Wildlife Service that "In the...Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population". The State of Colorado has accumulated much science from the reintroduction of Lynx in Colorado. This data and information should be used to refine goals and objectives for Lynx management. This document systematically ignores that real, substantive information is available in Colorado to guide forests and forest plans on Lynx management.	determine lynx habitat. The resulting mapping was an inventory of habitat. During site specific analyses the public can inform affected units of habitat conditions they are aware of that should be considered for those analyses. This amendment was undertaken to provide programmatic direction. Site specific analyses would provide an opportunity to update habitat information based on conditions present at that time. The best available information was considered in this analysis, including updated reintroduction information from the CO DNR.
126	77	20000	We are concerned that the LCAS and amendment fail to ensure that adequate and timely measures will be taken to reverse the fragmentation of lynx populations within the U.S. populations, and between lynx populations in both the U.S. and Canada.	Comment noted. The Forest Service consulted with the FWS to provide lynx habitat direction to ensure adequate regulatory mechanisms are in place.
126	7	20000	The lynx protections provided in Alternative E are inadequate to restore the lynx: According to the Forest Service's own analysis of how the various alternatives address threats to lynx identified in the LCAS, Alternative E fully addresses just six of 17 "risk factors" to lynx (DEIS Table 3-18, p.139). By contrast the Forest Service found that Alternative B fully addresses 16 of the 17 risk factors, and could be readily amended to address all 17.	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
150	54	20000	The DEIS ranks the alternatives by probability of lynx persistence. DEIS at 3-45 to 3-47. The DEIS reports that Alternative D would provide the lowest probability of lynx persistence in the Southern Rockies after the no action alternative. DEIS at 3-47, Table 3-WL-6. CSCUSA believes that this finding has no basis, is arbitrary, and should be removed from the document. The analysis underlying the poor ranking of Alternative D relies upon two faulty premises: (1) Alternative D will allow more snow compaction which harms lynx, and (2) the flexibility of All Standard 2 proposed in Alternative D will adversely affect lynx. Each conclusion has no support in the DEIS, invites controversy, incites unnecessary lawsuits, and should be stricken. The Alternative D lynx persistence finding has no justification. It opens the Forest Service to unwarranted criticism and improperly threatens the viability of this NEPA process. The probability of lynx persistence rating of Alternative D should be equal to that of Alternative B or C.	Effects are discussed in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.

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168	7	20000	What the analysis is supposed to be focusing on here is the grooming and/or designation of new snowmobile trails. The public is informed that over time, unregulated expansion designated or groomed snowmobile trails could "impair future conservation efforts". Incredibly, the analysis fails to mention how this "unregulated expansion" a) could occur in an "unregulated" fashion since designating trails is, by definition, a regulatory action; or, b) how designating and/or grooming trails would, or could, "impair future conservation efforts". The FS should develop and adopt an alternative that drops all direction limiting snow compaction.	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. The alternatives varied in how snow compaction was addressed.
231	7	20000	All alternatives should indicate that management of late-succession and old-growth forest should maintain or enhance the stand distribution, and of stand sizes, large snags, and down wood of the minimum size needed for den sites. The final preferred alternative should require a definite and measurable objective for these components, preferably on a large landscape scale. Allowing an unpredictable amount of future timber treatment under the wildland fire 10 year comprehensive strategy provides less assurance of the desired results of this amendment. A quantifiable result is necessary to determine success of the amendment and to fashion any necessary future management actions.	Comment noted. VEG S6 provides management direction pertaining to late successional forests.
235	12	20000	[The State of] Colorado urges that as much flexibility remains in the adoption of these Amendments to adjust practices on the ground to assure the best possible habitat for Canada Lynx while adhering to the multiple-use obligations of the U.S. Forest Service.	Comment noted.
235	29	20000	Livestock Grazing Management: The State of Colorado urges the implementation of any of the alternatives to be in as sparing a manner as possible. The practices advocated in this section of the DEIS reflect how all of these amendments throughout the DEIS should be implemented: in a sparing, precise and case-be-case fashion. The DEIS says it best: "For the most part, existing direction and current practices already implementing management that is equivalent to that provided in the three action alternatives. Effects to livestock management practices from any of the three alternatives would be expected to occur only in specific localized situations where current management is not meeting standards or where a change in current management would be needed to resolve a site specific concern." (DEIS, ch 3, p 83)	Comment noted.
235	13	20000	Alternatives should be science driven only, weeding out speculation and conjecture and based on the science we know now. Flexibility should	Comment noted. The best available information was considered for this analysis. Site-specific analyses will

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			dominate only so we can integrate in new management practices based on science, as the science gets more complete, refined and certainly more complex.	continue to incorporate new information as it becomes available.
239	6	20000	Question of what date will be used to consider what is an existing trail: There could be different implications for the Steamboat trails based on which alternative is selected. Ken Brink was unsure whether the trail that was changed to an ungroomed status for mitigation purposes was in a different LAU or not. However, Ken was not clear on why mitigation was necessary at all, since he was sure that the trail had been groomed previous to 1999.	This is noted in a monitoring item as: Map the location and intensity of snow compacting activities and designated and groomed routes that occurred inside LAUs during the period of 1998-2000.
246	24	20000	The Table of Contents does not match up with the actual page numbers. Please ensure the two match in the Final Environmental Impact statement.	Comment noted. The pagination errors have been corrected.
89	6	20100	PLA cannot endorse the alternatives analyzed in the DEIS due to the flaws identified in our above comments. We urge the agency to reconsider its approach to energy exploration and development activities and develop a more reasonable range of alternatives in the FEIS.	Comment noted.
95/30; 127/30	30	20100	The proposed alternatives will permanently cap precommercial thinning in the national forests in Colorado and southern Wyoming to less than 10% of identified thinning needs. Rather than analyze the effects of these reductions in thinning on ASQs, the DEIS suggests that the volume shortfalls won't be a problem for 60 years and that additional harvest for snowshoe hare habitat could mask the reductions. Table 3-T5 projects the effects as reductions in the LTSY, which is meaningless, instead of addressing true effects on implementation or recalculation of ASQ. There is no question that the proposed reduction of precommercial thinning will have an immediate effect on subsequent recalculations of ASQ and the Forest Service is unacceptably trying to gloss over those pending reductions in their haste to implement pre-determined management direction for lynx.	The Forest Resources analysis has been updated. Analyzing the maximum allowable sale quantity (ASQ) over a 10-15 year period for the individual forests was not determined necessary. Forest health issues were reviewed and long term sustained yield impacts were estimated and updated effects are disclosed in the Forest Resource section in Chapter 3 of the FEIS. The effect of thinning on commercial timber sale volumes will not happen for many decades – well beyond the 2007-2011 analysis timeframe used in the employment and income analysis. The implication of potential commercial timber sale volume upon the timber industry many decades from now is speculative at best, and therefore not addressed. The benefits and costs of future commercial timber sale volume are addressed, however, in the Financial/Economic Efficiency subsection.
95/56; 127/56	56	20100	VEG G6. The flaw in this Standard is that it will restrict activities with no discussion of the objective or desired condition.	Comment noted. VEG G6 would provide direction to maintain snowshoe hare habitat, the main prey for lynx.
95/55; 127/55	55	20100	VEG G1. We are puzzled as to why direction that would have a positive influence on lynx habitat is subject to all other forest plan direction, when none of the rest of the proposed amendment direction is subject to all other forest plan direction. For the remainder of the proposed direction, lynx direction trumps everything else, but apparently not when the proposed	Comment noted. The wording of VEG G1 is as follows: VEG G1. Where little or no habitat for snowshoe hares is currently available, vegetation management practices should be planned to recruit a high density of conifers, hardwoods, and shrubs preferred by snowshoe hares. Preference should be

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			direction actually means doing something on the ground.	given to mesic sites and mid-seral stage stands. Provide for continuing availability of lynx foraging habitat in proximity to denning habitat.
95/10; 127/10	10	20100	If the Forest Service still believes the affected forest plans must be changed, we recommend consideration of lynx management direction in the plan revisions or a significant forest plan amendment for each national forest, including an in-depth review of the effects on forest management, timber sale programs and forest health, a range of alternatives for mapped lynx habitat alternatives to consider changes to VEG S5 as outlined in our detailed comments, and a full opportunity for public review and comment. Additionally, the Records of Decision should make it explicitly clear that reductions in multiple use outputs will not occur as a result.	Comment noted. The analysis has been updated to incorporate updated vegetation conditions. Lynx habitat mapping was a biological inventory, which was done in an interagency process, as documented in Appendix F of the DEIS, SDEIS and FEIS. Adjustments to the habitat mapping may occur based on site-specific analyses. An NFMA significance evaluation was completed and is documented in the ROD. Overall multiple-use direction in the existing Forest Plans would be maintained. Future actions may be limited, but opportunities would not be eliminated. The analysis discusses anticipated impacts for all alternatives considered, by affected resource area in Chapter 3.
95/8; 127/8; 8/10; 14/10		20100	The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the Lynx Conservation Assessment and Strategy, with only slight variations, despite the fact that, according to the FWS, the potential for lynx in Colorado has always been "limited" and that "the most likely cause for the loss of resident lynx in Colorado was a natural process.	The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need. The FS consulted with the FWS with the development of Alternative F, in response to comments received on the draft analysis.
95/34; 127/34	34	20100	We do not agree that a specific Goal for conserving lynx should be incorporated into the forest plans. None of the forest plans, including those already revised contain such a species - specific goal for any of the other T&E species. There are already goals in each of the forest plans that lynx objectives can, and should, be tiered to.	Comment noted. Our review indicated that most existing Forest Plans do not have such a goal in place.
106	7	20100	By mapping lynx habitat, the USFS is limiting the choice of reasonable alternatives. This is entirely evidenced by the fact that the DEIS fails to consider any alternative lynx habitat mapping schemes that would alter the costs and benefits associated with the proposed lynx amendment. Thus, the mapping of lynx habitat seems to have placed limitations on the USFS's desire and ability to select reasonable mapping alternatives and consequently to select alternatives that vary in their impacts to lynx and lynx habitat.	Lynx habitat mapping was a biological inventory, which was done in an interagency process, as documented in Appendix F of the DEIS, SDEIS and FEIS. Adjustments to the habitat mapping may occur based on site-specific analyses.
106	32	20100	The proposed lynx amendment doesn't even seem to maintain the status quo with regards to lynx habitat. According to the proposed amendment, the USFS will still be allowed to destroy and degrade lynx habitat, maintaining levels at what can only be described as arbitrary and	Comment noted. Alternative F was developed to respond to comments while ensuring adequate regulatory direction was provided.

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			biologically unjustified levels. We cannot understand how the proposed lynx amendment can possibly serve to conserve lynx when not only is habitat restoration not provided for, but continued habitat loss and degradation is explicitly allowed. We request the USFS not only provide for lynx habitat restoration through the proposed lynx amendment, but ensure no further loss or degradation of lynx habitat to ensure the species and the ecosystem it depends upon is appropriately conserved.	
106	33	20100	The proposed lynx amendment seems to entirely ignore the need to conserve the ecosystem that the lynx depends upon. Of particular concern is that ecosystem processes, like fires, insect outbreaks, and blowdowns are not explicitly addressed, except to explain when and where such events can be exploited for timber. There are no standards, guidelines, goals, or objectives that allow such events to occur undisturbed in lynx habitat in the Southern Rockies, with the possible exception of designated wilderness. However, even if natural disturbances are allowed only in wilderness areas, which make up a very small proportion of forested lands in the Southern Rockies to begin with, it is difficult to see how this adequately conserves the ecosystem that the lynx depends upon.	Comment noted. Several of the vegetation objectives under the action alternatives address ecosystem processes..
106	34	20100	The proposed lynx amendment fails to address the need to conserve other ecosystem components, in particular riparian areas, streams, wetlands, springs, wet meadows, bogs, large blocks of continuous forest, and old growth ponderosa pine and lodgepole pine. There is no specific direction or measures that explicitly conserve these valuable ecosystem components, despite the fact that they are crucial to the health of the ecosystem the lynx depends upon.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. See also VEG S6 and GRAZ S3/GRAZ G3 for direction provided for late successional forests and riparian areas.
106	51	20100	We are troubled by the USFS's refusal to include national forests outside the Rocky Mountain Region that are ecologically contiguous with those in the Region within the geographic scope of the analysis and Forest Plan amendment. We urge the Forest Service to incorporate the Carson, Santa Fe, and Manti-La Sal National Forests into this amendment process. In lieu of including these areas in the current effort, the only alternative is for the Forest Service to immediately begin a separate amendment process for those three forests.	The Northern Region of the USFS completed Forest Plan amendments for lynx in the Utah National Forests that are considered to have viable lynx habitat. Lynx were not documented historically in New Mexico and the state of New Mexico does not consider lynx a native species in their state. The FWS listing package did not include New Mexico.
106	18	20100	The USFS has failed to address the adequacy of lynx habitat mapping through the DEIS and proposed lynx amendment despite public concerns, despite the interconnected nature of lynx habitat mapping and the proposed amendment, and despite the fact that consideration of lynx	Lynx habitat mapping was a biological inventory, which was done in an interagency process, as documented in Appendix F of the DEIS, SDEIS and FEIS. Adjustments to the habitat mapping may occur based on site-specific analyses.

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			habitat mapping is essential to ensuring the USFS fully analyzes a range of reasonable alternatives for the proposed lynx amendment. To remedy this situation, we request that the USFS address the adequacy of lynx habitat mapping through the proposed lynx amendment and issue a revised DEIS to appropriately inform the public of this issue and to ensure the public is given and opportunity to comment on lynx habitat mapping.	
106	16	20100	That lynx habitat has already been mapped and will remain constant in all action alternatives strongly indicates the agency has failed to address unresolved conflicts and failed to provide the responsible official with reasoned choice of actions.	
106	31	20100	Of great concern is that the proposed lynx amendment provides no standards to provide for the actual restoration of lynx habitat in the Southern Rockies. This is a significant downfall in the proposed amendment. While loss of habitat is reported to have contributes to population declines and the listed status of the lynx (USFWS 2000), the proposed amendment makes no attempt to address this problem.	Management direction provides the direction for lynx habitat in the Southern Rockies. This amendment is a programmatic level analysis. Individual project proposals may include ground disturbing activities for habitat restoration.
106	50	20100	We are troubled by the USFS's refusal to include national forests outside the Rocky Mountain Region that are ecologically contiguous with those in the Region within the geographic scope of the analysis and Forest Plan amendment. Lynx released in Colorado are known to have traveled, and may be residing, in northern New Mexico, and are thought to have at least traveled into Utah. As a consequence, land use activities authorized by existing forest plans may affect lynx and lynx habitat and those forest plans should be amended as part of this regional process to ensure that lynx and lynx habitat are adequately protected.	The Northern Region of the USFS completed Forest Plan amendments for lynx in the Utah National Forests that are considered to have viable lynx habitat. Lynx were not documented historically in New Mexico and the state of New Mexico does not consider lynx a native species in their state. The FWS listing package did not include New Mexico.
145	7	20100	The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the [LCAS], with only slight variations. I would strongly recommend that the Forest Service not proceed with this amendment process. Instead, the Forest Service should address lynx conservation issues in individual forest plan revisions and amendments, after the Fish & Wildlife Services designates critical habitat and completes a Lynx Recovery Plan under the Endangered Species Act. The Forest Service should look to the individual forest plan revisions as the place to resolve the many issues regarding lynx conservation measures.	The proposed action was based on the LCAS. The other action alternatives were based on the issues and public comments. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
146	10	20100	The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the Lynx Conservation Assessment and Strategy, with only	The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need.

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			slight variations.	
149	53	20100	<p>The FS also failed to consider the required range of alternatives. All of the management alternatives the Forest Service considers in this planning process must ensure the recovery of the lynx across the Southern Rockies. To do otherwise is to violate the Endangered Species Act, the National Forest Management Act, and the National Environmental Policy Act, not to mention the agency's duties as public trust stewards of National Forest lands. The range of alternatives considered in this DEIS clearly fails to meet this duty. Only one of the four alternatives (Alternative B) potentially provides for appropriate lynx and lynx habitat protection. Although Alternative A (no action) fails, the Forest Service is required to include it in the analysis to serve as a point of comparison. However, Alternatives C and D both fail as well. Both depart wildly from the best available science on lynx management. In fact, the DEIS concedes that the preferred alternative "may lead to adverse effects" in every "Lynx Productivity, Mortality and Movements" analysis category. Moreover, the DEIS concedes that Both Alternative C and the preferred alternative will "...decrease probability of lynx persistence." DEIS at S-17. In fact, an appropriate range of alternatives would necessarily include more protective alternatives, and ones that significantly reduced the uncertainty of potential impacts, than those considered in the DEIS. For example, the failure of the preferred alternative to prohibit logging in lynx denning habitat - primarily mature and old-growth spruce-fir - is difficult to understand. That the DEIS doesn't even consider and alternative that would do this is entirely unjustifiable.</p>	<p>The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need. The LCAS recommended retaining 10 percent denning habitat based on a publication that discussed maintaining lynx habitat over time (Brittel et al. 1989). Brittel recommended a balance of conditions – 30 percent forage, 30 percent unsuitable habitat that would grow into forage habitat, 30 percent travel, and ten percent denning. The ten percent denning habitat was generally based on providing 10 percent old growth habitat. Ongoing research since 1989 has shown that lynx dens are often found under large logs in mature forest stands, but dens have been located in smaller diameter "jack-strawed" piles as well as in rock piles in a variety of structural stages from young regenerating forests to old forests. The integral component of lynx den sites appears to be the amount of downed, woody debris, not the age of the forest stand (Mowat, et al. 2000). Lynx den sites are found in both mature and younger forests that have a large amount of cover and downed, large woody debris. The structural component of lynx den sites are common features in managed (logged) and unmanaged (e.g. insect damaged, windthrow) stands. Based on 40 den sites studied by Squires et al. (in prep) denning habitat is found in a variety of forest conditions and is not a limiting factor for lynx. Indeed, lynx have used all kinds of deadfall for den sites, so it is likely almost any forest does supply denning habitat. Based on this information, the FS consulted with the FWS with the development of Alternative F, in response to comments received on the draft analysis. Alternative F consolidates all the denning requirements into one Guideline; Guideline VEG 11. The research does not indicate a certain minimum amount of denning habitat is required for lynx. The research does indicate that pockets of large amounts of down wood, root wads, or large piles of small wind thrown trees provide denning habitat; and that these pockets should be distributed across an LAU. In general, most forests have some pockets of down trees that would be adequate denning</p>

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				habitat. However, under Guideline VEG G11 if denning habitat appears to be lacking in an LAU, then projects should be designed to retain coarse woody debris, piles, or residual trees to provide future denning habitat.
149	38	20100	The DEIS identifies several significant and key issues: Lynx Productivity, Mortality and Movements (Significant Issue #1), Public Safety (Significant Issue #2), Human Uses (Significant Issue #3), Management Indicator Species (Key Issue #1), Other Threatened, Endangered, and Proposed Species (Key Issue #2). DEIS at 14. However, the actual narrative analysis inexplicably seems to substitute "human uses" for most of the other non-human considerations identified as significant and key issues. For instance, the DEIS summarizes Alternative C in this way: "Alternative C was designed to respond to key issue, while still providing for the conservation and recovery of the Canada lynx." DEIS at Ch. 2 p. 18. Yet the ensuing analysis summary focuses almost exclusively on how Alternative C reduces the impact of lynx conservation on human land uses like logging/fuels reduction, snowmobile use, and developed recreation.	Comment noted.
149	37	20100	[Due to] the elimination of many of the protections recommended by the LCAS, the replacement of numerous non-discretionary standards recommended by the LCAS with discretionary guidelines, the sweeping exceptions for harmful activities, and the FS' failure to adequately consider the potential impacts of ongoing land uses authorized under existing Forest Plans and this lynx amendment to those plans, the DEIS is legally and biologically insufficient.	Comment noted. Alternative F was developed to respond to comments while ensuring adequate regulatory direction was provided.
149	40	20100	This is not an analysis about how the alternatives contribute to the "key issues" (specifically management Indicator Species and other Threatened-Endangered-Proposed species), but almost exclusively an analysis of how these alternatives contribute to increased human use without the hassles of lynx conservation measures. Moreover, "contributing to the conservation of lynx" isn't even the applicable standard. The Forest Service must actually provide for lynx conservation (not simply make lynx conservation more likely than if it made no forest plan changes).	Comment noted. Direction for linkage areas is included in the amendment.
149	43	20100	A modified Alternative B that specifically identifies and incorporates the 38 critical linkages as designated elsewhere by the FS (and described in the DEIS Appendix D), and adheres to the management recommendations in the LCAS, would significantly improve the lynx amendment's treatment of lynx movement needs in the Southern Rockies. See Exhibit 1. We also	Comment noted. Direction for linkage areas is included in the amendment.

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			support, for the same reasons, a modified Alternative B that requires appropriate highway mitigation (including underpasses and overpasses) for lynx within the 38 designated lynx linkages.	
149	44	20100	Even the Forest Service, in this flawed DEIS, acknowledges that the preferred alternative will not meet its basic regulatory and legal duties to protect lynx and lynx habitat.	Although the Alternative D had some adverse effects, the alternative still met the stated Purpose and Need.
149	54	20100	The Forest Service's analysis and conclusions are fatally flawed for all of the reasons noted throughout this letter. Perhaps the most devastating failure is the preferred alternative's inclusion of extensive and sweeping exceptions to the few tangible (and non-discretionary) standards it does include. The exceptions included in the preferred alternative are so broad and sweeping that virtually any project imagined by Forest Service planners can be excluded. However, if a Forest Service planner isn't clever enough to figure out how to package a particular project under one of these numerous exceptions, they need fear not, since ALL S2 provides for the virtually unfettered ability to suspend any standard or guideline. The Forest Service, consequently, cannot assess the potential impacts of ongoing land use activities unless it assumes that none of the included standards will be enforced, since the agency's discretion to suspend the included protections is expansive. The Forest Service has no ability to make a reasoned determination of lynx viability, a point that even the DEIS acknowledges.	Comment noted. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
149	52	20100	The unlimited nature of all of the preferred alternative's exceptions, including standard ALL S2 (which permits the FS to suspect any of the amendment's protections), could result in cumulative impacts that were not analyzed in the DEIS. As the DEIS states: The ALL S2 exception standard for all lynx standards...would be discretionary at the project level, and the cumulative effects analysis at a project level may be very difficult to accomplish, in order to adequately address cumulative effects for the SRMGA lynx population.	
150	31	20100	Although Alternatives C and D should be revised to incorporate more of the 2003 Listing Decision, CDOW reintroduction data, and Lynx Report, those alternatives provide administrative flexibility without compromising lynx conservation when compared to the WRNF lynx standards. For example, Standard All 2 for Alternative D would authorize the Forest Service to override a particular lynx standard at the project level based on a written determination "that the project is not likely to adversely affect lynx" or if "long-term benefits to lynx and its habitat would result." DEIS at	

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			2-21. By its terms, that standard could be used only if there are no adverse effects to lynx, or where there will be long-term benefits to lynx.	
150	11	20100	The Forest Service should substantively revise the management direction proposed in Alternatives C and D to incorporate the sources of information identified. This would improve the range of the alternatives under review and give significant support to the Forest Service's ultimate decision.	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
156	4	20100	It appears to me that the [DEIS] does not contain a wide range of alternatives for the conservation and recovery of lynx. I think you took the easy way out and based all of your alternatives on the LCAS and gave each a few trivial and insignificant adjustments. I believe the Forest Service should not proceed with the proposed forest plan amendments because the proposals are inappropriate.	
158	7	20100	The DEIS does not contain or evaluate a wide range of alternatives for the conservation and recovery of lynx. All of the alternatives considered are based on the Lynx Conservation Assessment and Strategy, with only slight variations.	
168	2	20100	The agency failed to include a reasonable range of alternatives. BlueRibbon Coalition and others suggested the FS develop and analyze an alternative that focused on implementation of active management, including but not limited to mechanical vegetative treatments to create and restore hare habitat as well as lynx re-introduction in existing habitat. The FS should develop a pro-active alternative that includes prescriptions for mechanical vegetative treatments, pre-commercial timber harvest and re-introduction to supplement the lynx population.	
238	13	20100	The DEIS expects limited change to result from implementation of VEG G1, since harvest would be subject to the rest of Forest Plan Standards, guidelines and resource constrains. Why is a Guideline that actually contains direction for making a positive influence on lynx habitat a guideline that is subject to all other forest plan direction, when none of the rest of the proposed amendment direction is subject to all other forest plan direction. For the remainder of the proposed direction, lynx direction trumps everything else, but not when the proposed direction actually means doing something on the ground. Keep Colorado wild and attractive. Allow business to develop with the environment in mind so that eco-friendly people can come and play in Colorado's greatness. Please create a STRONG Forest Service Amendment that would ensure the safety of the Lynx habitat.	
246	62	20100	The Department [of the Interior] believes that within the range of	Comment noted. The Forest Service consulted with the FWS

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			alternatives and the various components described for each (objectives, standards, and guidelines), adequate and appropriate conservation measures are described. The exact combination of objectives, standards, and guidelines must now be developed to fashion in a final preferred alternative. The wording and language in components can be revised to strengthen or clarify plan direction.	and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
4	4	20200	The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward of Desired Future Condition, nor does it contain or evaluate a wide range of alternatives for the conservation and recovery of lynx.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed. The likelihood of long term lynx population persistence is also discussed.
64	7	20200	Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of alternatives in an EIS, the Southern Rockies Lynx Amendment DEIS will be rated "EC-2 (Environmental Concerns- Insufficient Information). [EPA rates this DEIS] "EC-2" (Environmental concerns-insufficient information). The cumulative impacts analysis [of the Preferred Alternative]is incomplete and inadequate.	
64	6	20200	[EPA rates this DEIS] "EC-2" (Environmental concerns-insufficient information). Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of alternatives in an EIS, the Southern Rockies Lynx Amendment DEIS will be rated "EC-2 (Environmental Concerns- Insufficient Information). Our rating is based on management direction in the Preferred Alternative that would allow many activities that may not promote adequate conservation to allow the lynx to be restored and recovered in the Southern Rockies and would allow greater soil erosion and stream sedimentation and more adverse impacts to other wildlife, soils, vegetation, and other Forest resources.	Comment noted. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
106	24	20200	An alternative that prohibits logging of old growth forest was dismissed. The alternative was dismissed because, "Prohibiting harvest of all mature or old-growth timber would substantially change the overall multiple-use direction in existing plans; therefore, not meeting the purpose and need." DEIS p.34. This line of reasoning seems severely flawed in several regards. ... The USFS seems to be inappropriately dismissing an alternative that directly contributes to the conservation of the lynx. It is difficult to see how the USFS is meeting its conservation duties under	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. VEG S6 provides direction pertaining to late successional forests as they relate to snowshoe hare.

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			section 7(a) (1) by dismissing such an alternative from detailed analysis.	
106	25	20200	... It is difficult to understand how this alternative would not meet the purpose and need. The USFS desires to preserve multiple-use objectives, yet this alternative preserves a host of multiple-use objectives. For instance, logging would still be allowed, it just would not occur in old growth forest.	
106	26	20200 This alternative would most likely allow for the logging of old growth and mature forest outside of lynx analysis units, so it is further difficult to believe how this alternative presents some inordinate burden.	
106	27	20200	An alternative that prohibits logging of old growth forest was dismissed. The alternative was dismissed because, "Prohibiting harvest of all mature or old-growth timber would substantially change the overall multiple-use direction in existing plans; therefore, not meeting the purpose and need." DEIS p.34. This line of reasoning seems severely flawed in several regards. Even if the proposed alternative "substantially changes" the overall multiple-use direction in existing plans, how is this unacceptable? The USFS is proposing to amend (i.e., change) plans anyway. Why then would changing the forest plans to accommodate this alternative be inappropriate?	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. VEG S6 provides direction pertaining to late successional forests as they relate to snowshoe hare.
106	28	20200 Even if this alternative doesn't meet multiple-use objectives, the USFS should know that conservation of the lynx takes priority over multiple-use objectives. The specific requirements of the ESA clearly supersede the general requirements of the National Forest Management Act and Multiple-Use Sustained Yield Act.	
106	29	20200 By dismissing an alternative that prohibits logging of old growth or mature forest, the USFS seems to be acting under an inappropriate interpretation of statutory construction. This further cast doubt over whether the "multiple-use" goals of the purpose and need for the proposed lynx amendment are appropriate.	
106	30	20200	.. We also request the USFS consider other reasonable alternatives, including alternatives that provide stronger protection than the LCAS and alternatives that rely primarily on standards (i.e., nondiscretionary measures) to ensure protection of the lynx and its habitat.	
126	8	20200	Even if the lynx protection provided in Alternative E were adequate to restore lynx, there is no assurance that those lynx protections will be implemented. Exemptions for fuel treatment work: Alternative E allows any projects labeled "fuel treatment work" to proceed in lynx habitat, whether	

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			or not they comply with lynx standards or guidelines.	
126	6	20200	The lynx protections provided in Alternative E are inadequate to restore the lynx: The Forest Service's own analysis indicates that Alternative E fails to adequately address many threats to lynx. Of the 40 standards to protect lynx and lynx habitat in the LCAS, just seven standards remain in Alternative E (DEIS, Appendix N). Four of these seven allow significant exemptions, including the one labeled "ALL S2" that itself is an exemption to any of the other standards (see below). The three standards that remain (1) to maintain habitat connectivity with all new developments and timber sales, (2) not to change boundaries of Lynx Analysis Units; and (3) to identify potential wildlife crossing areas for new highways in linkage areas are not sufficient to restore lynx.	do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
126	23	20200	We believe the Forest Service is obliged to create a "conservationist" alternative that incorporates the scientific information we have provided in out scoping comments and translates it into appropriate management actions.	The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need.
239	3	20200	Differences between the alternatives concerning new groomed trail development: For alternatives B and C, there are standards and objectives that say: A map of these 'consistently compacted areas' is not available in GIS, and there seems to be no definitive tables and no specific definitions for these consistently compacted areas. (Tables 3-REC1, REC2 and REC3 touch on this but are not clear, as the listing of areas is expressed as 'affected acres' rather than 'consistently compacted areas', and the 'groomed miles' doesn't include snowmobile trail miles). They were drawn by each forest, but the interpretation of the definition may vary quite a bit from forest to forest. So the number of miles and acres for these areas may vary greatly, and hence the implications under Alternatives B and C for new groomed trails will be different.	Comment noted. The Recreation section has been reviewed and information updated, or clarified.
239	2	20200	Differences between the alternatives concerning new groomed trail development: For alternatives B and C, there are standards and objectives that say: The only difference between B and C as far as implications to groomed trails is that for B there will be not net increase within each lynx analysis unit (LAU) whereas for C the standard says "no net increase within an LAU or a combination of adjacent LAUs". So C is slightly more lax on the standard.	Comment noted.
1	1	21000	The preferred alternative will decimate the lynx habitat areas. I wage that all lynx and habitats be established as Habitat Sanctuary Preserve areas. [I urge you]to promote lynx linkage areas, to promote the preservation of	Part of the purpose and need is to allow for multiple use management on NFS lands. This comment to eliminate or remove multiple use activities from the NFS lands is outside

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			all old growth, and to fully preserve each roadless area and unroaded area, and to designate some as wilderness. [I also urge you] to obliterate roads, to end logging, to eliminate off-road vehicles and snowmobiles, to exclude all ski areas, to expel all mineral and gas oil activities, [and] to remove all livestock grazing. May I urge the following: To establish the Southern Rockies Canada Lynx Natural Preserve of 2710 acres and to designate the Southern Rockies Canada Lynx Natural Preserve Wilderness of 2441 acres. Let us save the lynx!	the scope of this amendment.
5	1	21000	Only Alternative A is good. Alternative D is better than B or C but it is still not good. The USFS should not support this misuse of public lands. Alternatives B, C, and D all contain too much proposed and too much potential restriction on the American public's use of public lands.	Comment noted.
59	4	21000	We support limiting human uses as stated in all the alternatives including C and we feel limiting authorization to existing groomed or designated routes with limited expansion beyond that strikes a good balance. Human populations need to adapt to the limits of what a forest resource can provide without degrading itself. As our populations increase they will simply have to adapt and we support your agencies in your efforts to keep this balance.	Comment noted.
64	27	21000	We recommend that this VEG S3 Standard be used in all alternatives. We also understand from conversations with the FWS that the interagency lynx team biologists believe that VEG S3 should be written as, "Maintain at least ten percent of the lynx habitat in an LAU as denning habitat well distributed in the LAU."	Comment noted.
64	28	21000	It would be helpful to understand how fuel treatment projects will be evaluated as they potentially affect lynx and its habitats and how those evaluations will avoid adverse impacts individually and cumulatively. If the USFS believes some fuels treatment exemption is necessary, we recommend that the VEG Standards S1 and S3 allow exemptions to apply only in at-risk WUIs and other high-priority areas, not all hazardous fuels reduction activities as are allowed by exception under Alternative D.	Comment noted.
64	80	21000	We are concerned about the Medicine-Bow Forest Plan Revision that was scheduled for December, 2003. That revision also proposed the equivalent of Alternative B direction as part of its Preferred Alternative (DEIS, page 3-4). That alternative has positive impacts on virtually all MIS and other rare and sensitive fish and wildlife species. Will the Medicine-Bow Forest Plan Revision and direction be adversely affected (that is, weakened) by the Lynx Amendment DEIS or will it adhere to the more protective Standards	The Medicine Bow Forest Plan will be amended to provide for consistent management direction in the Southern Rockies.

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			in Alternative B?	
64	9	21000	Alternative D would allow many activities that potentially harm the lynx and its habitat and other species and resources. Further, Alternative D may not promote adequate conservation to allow recovery of the lynx and thus not respond to Purpose and Need. Progress that already has been made with LCAS conservation measures may be impaired by implementing Alternative D and replacing mandatory Standards with discretionary Guidelines. Alternative D also proposes Standards ALL S1 and ALL S2, that would allow projects to deviate from lynx Standards. Table 2-3 (pages 2-38 to 2-44) describes numerous deviations in direction from the Proposed Action that would weaken lynx protections through either weakened Standards or Guidelines. Standards established under Alternative B would better promote lynx conservation and recovery.	Comment noted. Anticipated effects are disclosed for all alternatives. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
64	16	21000	In Alternatives C and D, the ALL S2 Standard would allow projects that deviate from Standards to proceed. Standard ALL S2 allows numerous exceptions to mandatory Standards in the LCAS and is likely to result in inconsistent application of Standards and Guidelines across the landscape.	
64	18	21000	The ALL S1 Standard - meant to maintain habitat connectivity - allows exceptions for fuel treatments, fossil fuel exploration and development activities, and energy transmission facilities and activities. EPA recommends that those exceptions be removed. We also recommend that the ALL S1 Standard be the same as Alternative B for all alternatives, not allowing exceptions. These exceptions were not proposed in the Northern Rockies Lynx Amendment DEIS.	Comment noted.
64	84	21000	For denning and foraging habitats, Alternatives A, C, and D have Vegetation Standards and Guidelines that would allow for adverse effects to individual lynx. In the worst-case scenario, there could be adverse effects to both denning and the associated foraging habitat that may affect lynx populations in localized areas. There is no mention of the timing of vegetation management activities and their impacts to the actual denning and raising of young lynx.	Comment noted. Effects to denning and foraging habitat are discussed in the FEIS wildlife section of Chapter 3 (FEIS pp. 85-98).
86	7	21000	The USDA implemented the recovery program and should be bound to "follow through". In other words, the USDA should not adopt a new alternative unless the new approach increases the potential for lynx recovery and sustenance. This could be accomplished by adoption of alternative B; it will not be accomplished by adoption of alternative's C or D. To base a new alternative for lynx recovery primarily on an executive	Comment noted. The Forest Service consulted with the FWS to the development of Alternative F, which was developed to respond to comments.

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			order and not on realistic scientific data and knowledge is fraudulent.	
87	1	21000	We applaud the Forest Service for undertaking the development of a regional lynx conservation plan, but we are disturbed at how little the preferred alternative actually would do to protect lynx and lynx habitat.	
89	1	21000	The Forest Service apparently believes it has adequately addressed the President's National Energy Policy and Executive Order 13212, Actions to Expedite Energy Related Projects, by relegating energy resource considerations to analysis under Alternative D. PLA disagrees that the Forest Service has met the President's direction. Merely analyzing and including these values in an alternative the agency had no intention of adopting or even incorporating into the preferred alternative does not serve as compliance to the Executive Order, especially since it appears that the only noticeable distinction between Alternative B and Alternative D is that Alternative D possibly exempts energy activities from limits on the over-the-snow access. All other restrictions are the same in both alternatives. As a result of these findings, PLA asserts that the range of alternatives contained in the DEIS is inadequate in terms of NEPA compliance, particularly with respect to energy resource activities.	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
91	2	21000	There is no scientific evidence that the lynx introduction proposals will even work. By selecting Alternatives B or C, we will be restricted by the types of activities that can take place on our local forests. The lynx may not survive even if the entire forest was closed to human activity, hypothetically speaking.	Comment noted. Lynx introduction proposals are outside the scope of this analysis.
95/32; 127/32	32	21000	The DEIS projects effects on LTSY on the various national forests as high as a 16% reduction for the Routt NF, but we believe the DEIS has consciously and significantly understated both the short-term and long-term effects of this standard.	Appendix F includes a notation of climax lodgepole, and other dry forest types, as not contributing to lynx habitat. The Forest Resources - Timber Management has been reviewed and updated for the FEIS. An NFMA significance evaluation was completed and is documented in the ROD. Overall multiple-use direction in the existing Forest Plans would be maintained. Future actions may be limited, but opportunities would not be eliminated. The analysis discusses anticipated impacts for all alternatives considered, by affected resource area in Chapter 3.
106	3	21000	Alternatives C and D seem to prioritize exploitation of lynx habitat, rather than protection, to the ultimate detriment of lynx in the Southern Rockies. As portrayed in the DEIS, it does not appear that alternatives C or D appropriately conserve the lynx in accordance with the ESA. Rather, it seems that alternatives C or D will ultimately push the lynx to extirpation in	Comment noted. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.

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			the Southern Rockies.	
106	46	21000	Regulations at 36 CFR section 219.19 specifically require the USFS to maintain viable populations of native species. A viable population is defined as "one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area." Although it is unclear how the USFS defined the planning area for the proposed lynx amendment, it seems that even the USFS, in this flawed DEIS, acknowledges that the preferred alternative will not meet its basic regulatory and legal duties to protect lynx and lynx habitat.	
106	2	21000	Under alternatives c and d, the USFS is proposing massive departures from the recommendations of lynx scientists. Alternatives c and d seem to be based on the false assumption that widespread thinning and logging is needed to protect the lynx and to protect homes and communities, and seem to seriously downplay the impacts of winter recreation to lynx.	Comment noted.
115	2	21000	The alternative that best protects the lynx and its habitat whether alternative C or D or some other combination is the one to be chosen. Whether fuel reduction, precommercial thinning, etc. are justified is a questionable and maybe just reactions to funding opportunities. Natural successional diversity provides (when areas are large enough and migration corridors are available) the best mix habitat for the combination of species needed for the lynx. Mechanized routes intercepting wildlife corridors are not acceptable winter or summer.	Comment noted.
124	1	21000	It is likely that all of the alternatives (B, C, and D) would work well here. However, it is easy to anticipate a growing demand for summer and winter recreation and easy to see that the red zone of the wildland-urban interface is expanding rapidly at the federal forest edges. Establishing a solid foundation of protection now, allowing for the best likelihood for lynx recovery, would appear to be the best strategy for Larimer County; it is far easier and more cost-effective to protect what we have than recover what we have lost.	Comment noted.
126	46	21000	A policy limited to designated snowmobile "play areas" only is clearly deficient, since there are only four designated snowmobile play areas in the entire region.	Comment noted. Snowmobile use is addressed in the Human uses management activities and practices measures (HU) in Table 2-1.
126	1	21000	Predator Conservation Alliance initially supported the Forest Service in its development of regional land management plan amendments to restore lynx in the Rocky Mountains, but we are very concerned that the current Forest Service "preferred alternatives" [Alternative B] in both the northern	Comment noted.

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			and southern Rocky Mountain environmental impact statements are inadequate to restore lynx and their habitat. We urge the Forest Service to implement the "proposed action" in both areas, with some strengthening modifications that we described in our joint letters submitted for each of the amendments.	
136	2	21000	Change the HU G6 alternative described under Alternative C to match HU G6 proposed for Alternative B. Previous attempts to re-introduce lynx in New York's Adirondack State Park failed because of high vehicular mortality to lynx along paved roads.	The alternatives were developed to address issues. Changing Alternative C HU G6 to match Alternative B was not determined necessary for this analysis. Comment noted.
136	1	21000	I find it nearly impossible to understand why the Forest Service would recommend a management alternative for a federally threatened and state endangered species that, by its own admission, "Decreases the probability of lynx persistence," and "may not ensure sufficient habitat quantity, quality, distribution... to provide for lynx productivity." The state of Colorado has taken the lead in efforts to restore a viable population of lynx in the Southern Rocky Mountains, and I encourage the Forest Service to support those efforts by managing its land in a biologically sound manner for lynx.	Comment noted.
137	12	21000	The DEIS is very confusing regarding which is the proposed action - or which is the preferred alternative. It states Alt. B was the proposed action in scoping, yet Alt. D is the "preferred" [FS] alternative. Not clear - violates NEPA by not clearly disclosing the proposed alternative.	Alternative B represents the proposed action sent out in scoping. Alternative D was developed in response to issues from scoping and was identified as the preferred alternative by the decision maker. The selected alternative is identified in the Record of Decision.
137	7	21000	Overall, the new Alternative D is not an improvement for managing habitat and uses in National forests with Lynx populations. Alt. B was actually much better in providing protection and standards for Lynx, but fails also to include the Carson NF.	Comment noted. The Carson National Forest is outside the scope of this amendment.
148	7	21000	Alt B is about lynx, Alt D is pure politics: currying political favor with budgetary payoffs. That paddle-pawed feline, the lynx, has been a real roadblock to all the high-dollar management that USFS bureaucracy thrives on. Alt D is the political bulldozer to get that troublesome cat off the road to broad, budgetary horizons. This urban/wildland fire panic promises to be the cash cow for the USFS that the Cold War as for the military industrial complex, but first Lynx canadensis must be dealt with.	Comment noted.

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148	1	21000	The only plausible reason for this proposed amendment is to dispense with the troublesome strictures of the Endangered Species Act (ESA) so that more recent political caprice can be acceded to (recent political caprice = Executive Order 13212 and "A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: A 10-Year Comprehensive Strategy"). That is the essential difference between Alternative B and Alternative D. Alternative B embodies the spirit and letter of NFMA and ESA, acts of Congress deliberated over a period of years. Alternative D concedes to a prejudiced Executive Order and fire panicked rhetoric, both directives deficient in the legitimate dialogue that the Founding Fathers tried to ensure by means of the Constitution.	Comment noted.
149	1	21000	While we are thrilled to see the Forest Service undertake the development of a regional lynx conservation plan, we are astonished at how little the preferred alternative would actually do to protect lynx and lynx habitat. The preferred alternative represents a remarkable departure from the best available science on lynx conservation and the recommendations of the Forest Service's own biologists (and those of the other federal agencies involved in the development of the Lynx Conservation Assessment and Strategy).	Comment noted. Alternative B represents the management direction most closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
149	7	21000	The Forest Service must adopt an alternative that offers protections no weaker than those found in the current Alternative B and should, in fact, improve Alternative B in several key respects. The lynx amendment must include strengthened monitoring requirements.	Comment noted.
149	35	21000	The preferred alternative departs so radically from the best available science and the recommendations of the LCAS, even if the FS had complied with its analysis duties, the amendment as such, and ongoing implementation of existing Forest Plans, do not comply with the agency's substantive protective duties under NFMA and the ESA. The result is predictable: the proposed lynx amendment will not protect lynx. Even the FS concedes this problem.	Comment noted. The Forest Service consulted with the FWS to provide lynx habitat direction to ensure adequate regulatory mechanisms are in place.
149	42	21000	The Humane Society of the U.S. and the Urban Wildlife Research Center state that at least one million animals are killed each day on U.S. highways. Animal-vehicle collisions (AVCs) cause approximately 29,000 human injuries, 211 fatalities, and are estimated to cause over \$1 billion in property damage annually in the U.S. In Colorado, animal-caused crashes-which include wildlife and domestic animals-were cited as the	Comment noted. Direction is provided for linkages between lynx habitat areas.

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			number three reason for road accidents in 2001, behind inattentive driving, and excessive speeds, according to the Colorado State Patrol. Highways are also known to be a major barrier to wildlife movement because of wildlife mortality on highways and because roads, especially major interstates, such as I-70 prevent animals from moving from one landscape to another. Unfortunately, for these reasons and for reasons already discussed, the preferred alternative does not adequately protect landscape connectivity for lynx.	
149	36	21000	The preferred alternative's primary mechanism for managing the use of its many exceptions its repeated reliance on guidelines instead of standards (which can be readily ignored), and the standard which allows a land manager to ignore any of the amendment's provisions she or he couldn't find another way to circumvent, is the use of some monitoring provisions. This monitoring is presumably intended to identify the extent to which these exceptions are used. Even this lackluster effort fails, however, because DEIS fails to include a specific and concrete monitoring plan nor any specific triggers that will require a reevaluation of the exceptions and their use. Monitoring, even if conducted vigorously, is of little use without mechanisms to ensure that the monitoring results are evaluated and, if certain thresholds are exceeded, changes to the activities themselves (in this case the lynx amendment) are made. The DEIS does not do this.	Comment noted. The Forest Service consulted with the FWS to provide lynx habitat direction to ensure adequate regulatory mechanisms are in place.
150	25	21000	CSCUSA believes that the Forest Service is improperly concluding that Alternatives C and D would provide significantly less probability of lynx persistence in the Southern Rockies than would Alternative B. DEIS at 3-45 to 3-48. Those conclusions (discussed in Section P below) are fundamentally flawed. They are unwarranted, without basis, and are not supported by the DEIS.	Comment noted. The effects are discussed in Chapter 3.
150	7	21000	The DEIS appropriately proposes two action alternatives to the LCAS-based lynx standards and guidelines of Alternative B. Alternatives C and D provide flexibility that is not offered in Alternative B. By casting certain direction as guidelines (rather than standards) and providing standards and guidelines that allow flexibility so long as there are no adverse effects to lynx - such as Alternative D's All Standard 2 - the DEIS offers a range of alternatives. The flexibility inherent in Alternatives C and D helps achieve the purpose and need of the DEIS.	Comment noted.
150	33	21000	Alternatives B, C, and D, and the analysis in the DEIS, improperly treat the untested, unproven speculative snow compaction hypothesis as proven fact. Those statements should be eliminated. More troubling, snow	Comment noted. Chapter 3 discusses the anticipated effects under each alternative.

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			compaction theorizing appears to be the basis of the agency's conclusion that Alternative D will provide a lower probability of lynx persistence than would Alternatives B or C. DEIS at 3-20.	
150	41	21000	Vegetation Management Guidelines 6 and 8, Alternative D: Vegetation Management Guidelines 6 and 8 apply in Alternative D in lieu of, respectively, Vegetation Management Standards 4 and 6 that are proposed in Alternatives B and C. DEIS at S-9 to S-10. Vegetation Management Standards 4 and 6 exempt "developed recreation sites" and activities "within permitted ski area boundaries." Through an oversight, Vegetation Management Guidelines 6 and 8 do not carry over the exemption of the standards. CSCUSA specifically requests that the Forest Service add to Vegetation Management Guidelines 6 and 8 the exemptions for activities within permitted ski area boundaries. Otherwise, the guidelines are more restrictive than the standards upon which they are based.	Comment noted. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
150	39	21000	Vegetation Management Standard 3 provides: Maintain denning habitat within a LAU in patches generally larger than 5 acres comprising at least 10 percent of the lynx habitat. Where less than 10 percent denning habitat is present in a LAU, defer vegetation management practices and activities in stands that have the highest potential to develop denning habitat. DEIS at S-6, S-7, 1-8. The quoted portion of Vegetation Management Standard 3 is identical in Alternatives B, C, and D. It is unclear whether any LAUs in the National Forests at issue are below the 10% threshold. More importantly, this standard does not specify whether denning habitat must be maintained in patches larger than 5 acres where more than 10% denning habitat is present within an LAU. This should be clarified. To prevent a foreseeable misinterpretation of Vegetation Management Standard 3, the Forest Service should clarify that the obligations of the standard are not triggered, including within permitted boundaries of ski areas, unless the LAU contains less than 10% lynx denning habitat.	Comment noted. Chapter 3 discusses anticipated effects to lynx habitat. Denning habitat needs were reviewed and new information considered that noted denning habitat is not limiting. Alternative F was developed to incorporate new information and consideration of comments on the DEIS and SDEIS.
150	40	21000	Vegetation Management Standard 4, Alternatives B and C: Vegetation Management Standard 4 exempts "developed recreation sites" without reference to ski areas. DEIS at S7. Other standards list "permitted ski areas" when referencing "developed recreation sites". E.g., Vegetation Management Standard 6, DEIS at S-9. A ski area under special use permit is most certainly a developed recreation site. For clarity, we urge the Forest Service to add "permitted ski areas" as an example of a "developed recreation site" in Vegetation Management Standard 4.	Comment noted.

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177	7	21000	We don't believe that the president's executive order should override federal law such as the ESA. We fear that the administration's extremist anti-wildlife positions could also lead to a future repeat of this expensive FS work if alternative D is chosen in its current form. The issue could easily be solved for good if the worst parts of alt D were changed to limit spruce fir logging, far from towns, and limit new snowmobile trails. We ask that alt B be adopted or at least, something similar to C, that has reasonable limits on lynx habitat destruction under the guise of fire safety. A lynx plan that purposely and admittedly will "decrease the possibility of Lynx persistence" is unacceptable. Especially when the FS has studied and understands the problem well enough to know better.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
177	5	21000	As the FS admits, habitat (mainly old growth spruce fir) quality and connectivity are the main issues for lynx survival. You should have mentioned that this is also true of all of the other spruce fir MIS/TES species. Alt B would help all of the species and alt D would hurt them all. Chapter 3, Table S2, the FS admits that alt D will adversely affect snow compaction, landscape connectivity, and decrease the probability of lynx persistence. Alt C will "slightly decrease" the probability of lynx persistence. We believe this is correct, but do not agree that it is acceptable.	Comment and disagreement noted. Effects are discussed in Chapter 3.
204	1	21000	Alternative A (No Action), is not prudent, nor responsible administration of our public lands. Alternative B, is also not in the best interest of our society. Constraining the Healthy Forests Initiative is not responsible stewardship. Constraining Fire Fuel Remediation efforts ultimately will cause greater harm to our forests than the 'let it over grow', mentality has already done. As a Wildland Volunteer Firefighter on a Type III team, I feel that it is your responsibility to reduce fuels to not only save our environment, but to save the potential loss of life from fire fighters responding to a Wildland fire in a non fuel remediated area. The taxpayers cost of such 'hot' fires, the environmental impact of such 'hot' fires, and the increased potential for loss of human life is of far more concern to our society, than extending/protecting a lynx habitat in an area where lynx may currently or might in the future inhabit. An area that experiences such a 'hot' fire, resulting in sterilized soils that are impervious to water is not a suitable or enjoyable habitat for man nor beast.	Comment noted. Alternatives D and F provide for fuels treatments to address the Healthy Forest Initiative and National Fire Plan.
211	24	21000	The CWF is concerned about the ultimate conclusions made for lynx by the DEIS. The USFS failed to provide specific conclusions on whether the purpose and need is being met by each alternative. The USFS instead provided a relative scale of lynx conservation, based upon the conclusion	Comment noted. All action alternatives would provide management direction for lynx, while providing for other multiple uses. The Forest Service consulted with the FWS and considered comments received and developed

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			that the no action alternative does not meet the purpose and need. Alternative B appears to meet the purpose and need, alternative C decreases the likelihood of persistence as compared to alternative B, and alternative D results in a still lower likelihood or persistence. It would appear that the USFS is either unsure whether alternatives C and D meet the purpose and need for the action or has chosen not to answer the question directly.	Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
211	21	21000	Vegetation Standard 5: Alternative D contains so many exceptions to the vegetation standard that we question why the attempt was even to include this standard in Alternative D.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
211	25	21000	The conclusion states that alternative B meets the definition of outcome 3, which includes the applicable conservation measures necessary to conserve lynx that were developed from the LCAS. However, there are large gaps in the spatial analysis for alternative B and the accompanying exemptions. We believe that Alternatives C could meet the purpose and need for the action, depending on how often the exemptions are applied at the project level. However, CWF does not support alternatives C or D as currently written and does not think that they meet the purpose and need for the action. There is considerable question whether or not alternative D provides a basis for adequate regulatory mechanisms for the recovery of lynx in the SRMGA. To the contrary, implementation of alternative D may result in the inability of management plans to provide sufficient direction to conserve and recover the lynx, and it may significantly reduce the likelihood [of] survival and recovery of the lynx population in the SRMGA.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
211	6	21000	In Alternatives B and C, implementation of the "Wildland Fire Use" exemption may result in negative effects to lynx that are not disclosed in the DEIS. As stated in page 35, the standard applies to not only the landscape linkages, but to all lynx habitat. Therefore, the exemptions could result in negative effects to lynx through the breakdown of movement corridors. Also, in the absence of a broad scale assessment, this exemption could result in significant effects to a lynx home range, particularly if used in conjunction with other exemptions.	Comment noted. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
211	20	21000	Vegetation Standard 5: Included in each of the action alternatives is a list of exempted activities where this standard does not apply. We understand that the first item on the list in alternatives B and C is a misprint. If this	Comment noted.

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			exemption is not a misprint, it has the potential to facilitate giving up quality snowshoe hare habitat for livestock grazing, even where grazing may be inappropriate. The exemption should be removed from all of the alternatives because it is in direct conflict with conservation of lynx.	
217/2; 218/2	2	21000	Alternatives B and C impose severe limitations that are not scientifically justified. In addition, Alternative D is the only alternative that allows the Local Forest Managers to actively manage our Forest. This is how I think it should be since the local Forest Supervisors know best what is going in the Forest, rather than some bureaucrat in Washington trying to figure out what is happening.	Comment noted.
227	2	21000	If Alternatives B or C is selected, activity on the forest will be greatly restricted.	Comment noted. Anticipated effects are discussed in Chapter 3.
230	3	21000	The document identifies Alternative B as the "Proposed Action" and Alternative D as the "Agency Preferred Alternative", yet these terms are not defined. Also, the amendment does not provide any rationale for how the agency arrived at selecting Alternative D as the agency preferred alternative. The rationale and a description of any decision-making process that was used should be included in the document. Also, the document fails to clearly identify an environmental preferred alternative as required by the National Environmental Protection Act (NEPA).	Comment noted. Alternative B represents the proposed action that was sent out in scoping. At the time of the release of the DEIS, Alternative D was the alternative preferred by the decision maker. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
235	25	21000	VEG S4: Colorado supports Alternatives C or D, but reemphasizes the point raised in commentary in the DEIS of the potential to substantially increase the size of insect infestations resulting from blowdown and small infestations, resulting in significant loss of trees and increases in fuel loads. (DEIS, Chapter 3, page 74) These alternatives maintain flexibility in fuels treatment, but may prove counterproductive in the increase in fuel loads.	Comment noted.
235	26	21000	Alternative D (VEG G8) is more flexible than Alternative C (VEG S4) in that it would allow salvage of some areas smaller than five acres to allow for mitigating circumstances.	Comment noted.
235	27	21000	VEG S5: Colorado supports Alternative D due to flexibility in fuels treatment. Also, Alternative B is unduly restrictive on pre-commercial thinning, approaching "an 89% reduction of production of sawlog-sized material...anticipated over the next 60 years."	Comment noted.
235	28	21000	VEG S6: [The State of] Colorado supports both Alternatives C and D due to flexibility for fuels treatment.	Comment noted.

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235	15	21000	All S1 Standard: This Standard is problematic because its goal is to maintain habitat connectivity regardless of the circumstances related to permanent developments and vegetation management practices. Alternative D's application of the standard is preferable only because of allowance for fuels treatment, but there remain numerous questions about how this standard is applied on the ground. Does it, for instance, preclude ski area expansion because of standing disagreement whether ski slope[s] enhance or detract from connectivity? Does it extend beyond the boundaries of the various forests and apply to lynx linkages, which interface heavily with private property uses and uses on other non-federal lands? The Standard raises more questions than can be adequately measured or quantified.	Comment noted.
235	34	21000	HU S3 for alternatives B, C, and D cause Colorado concern due to the limitation on "non-recreational special uses". Specifically, Colorado does not want to limit the access of its Division of Water Resources to observe snow survey sites, gauging stations and dams. This limitation across-the-board for all action alternatives causes Colorado to choose the No Action Alternative for this issue.	Access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
235	35	21000	Colorado's biologists have advocated for Alternative B for Guideline HU G6 (See CDOW Letter, Remington), stating that any lesser direction (namely, Alternative D) adversely affect lynx by interrupting travel corridors. HU G6 under Alternative D treats road upgrades as a foregone conclusion with cautions to avoid or reduce effects to lynx habitat connectivity. Colorado errs toward Alternative D for safety reasons, but urges the Forest Service to thoroughly Analyze the prospect of increased speeds, increased traffic volume and change in types of usage for roads. The connectivity must be explored on a case-by-case basis, and current lynx movements, nearby denning and foraging habitat should all be analyzed.	Comment noted.
235	20	21000	Vegetation Management Activities and Practices: A measure of perspective needs to be maintained in the discussion of alternatives presented in this category. Table 3-T5 (DEIS, Chapter 3, page 79) points to the reductions in long-term harvest and pre-commercial thinning which will occur under the various alternatives. The pre-commercial thinning acreage starts at 4867 acres across the Southern Rockies for the No Action Alternative A and drops into the low three thousand ranges for the remaining alternatives. Between Alternative B and D, there is only a 155-acre difference in the amount of pre-commercial thinning.	Comment noted. The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest

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238	8	21000	We are very concerned about the restrictive nature of standard VEG S5, regarding precommercial thinning. This standard in Alternative B in lodgepole pine "would result in essentially no precommercial thinning within lynx habitat...for an indefinite period" and "an 89% reduction of production of sawlog-sized material would be anticipated over the next 60 years". Alternative D is vaguely better, as it would allow "for thinning to occur in some stands prior to the permanent loss of the physiological ability of a tree to respond"; the reductions in the future sawlog volume production "would be less than under Alternative B". it is hard to understand the significance of this since the DEIS states the large areas of lodgepole pine are not even included as lynx habitat. How much area and on what Forests does this analysis apply to?	health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative in Table 3-13. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
239	1	21000	From my reading, Alternatives B and C have a standard that would limit, to some extent, the creation of new groomed or designated trails outside of existing compacted areas. Alternative D provides a similar guideline, rather than a standard, but it is less specific about how and where there would be a limitation of new groomed trails, and from my understanding, it is not very strongly worded. All of the alternatives do not directly remove or create a conflict with any existing groomed trails, even if they are within "good" potential lynx habitat areas. The only complication [with State Park snowmobile trails] possible I see is if the interpretation of what "existing" or "designated" trails are, differs from what I have been able to glean from the plan and discussions with Lois Poppert.	Comment noted.
239	4	21000	Differences between the alternatives concerning new groomed trail development. For alternatives B and C, there are standards and objectives that say: For Alternative D, the goal of no net increase is a guideline (G10) rather than a standard, but the process for new groomed trails is not very clear. There is no discussion of an exception process, but since it is a guideline, it "would not be required to be implemented on all proposed activities." My understanding of that is that the forest supervisors would work with the guideline of not increasing the compaction significantly, but new groomed trails might be allowed or not allowed on a case by case basis, without a formal exception process. Alternative D still would have objectives to "maintain or improve lynx habitat", and "maintain connectivity", so new trails through prime denning or foraging habitat might not be allowed.	Comment noted.
242	9	21000	For VEG Standard 3, concerning denning habitat, we are comfortable with the level of protection afforded by Alternatives B and C.	Comment noted.

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242	4	21000	While we support the additional flexibility in Alternatives C and D in some cases, we could not support them entirely because in many cases the protection afforded was via Guidelines ("...preferred or advisable..."), rather than Standards ("...mandatory. Deviations...require a Plan amendment...").	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
242	5	21000	Specifically, for objective All Standard 1 (new or expanded permanent developments and vegetation management practices must maintain habitat connectivity), we support the additional protection afforded by Alternatives B and C.	Comment noted.
242	21	21000	For Alternative C and D, Guideline HU G6 changes the emphasis from 'avoid' to reduce effects of upgrading roads. For Colorado this could severely impact lynx habitat fragmentation and interrupt travel corridors. Thus for this standard, Alternatives C and D could adversely affect lynx.	Comment noted. Effects are discussed in Chapter 3.
242	12	21000	For VEG Standard 5, pertaining to pre-commercial thinning, we are comfortable with the level of protection afforded by Alternatives B and C.	Comment noted.
242	15	21000	Some grazing practices in riparian areas may be detrimental to lynx if they degrade these areas and lower prey abundance during this seasonal use. Alternative D replaced the grazing standards S1, S2, S3, S4 and Standard LINK S2 of Alternative B and C with guidelines G1, G2, G3, G4 and Guideline LINK G2. Thus, Alternative D may result in adverse impacts to lynx by decreasing snowshoe hare habitat if these guidelines are not followed.	Comment noted. The FWS noted grazing did not pose a threat to lynx populations, therefore the grazing items were changed to guidelines in Alternative D. Anticipated effects are discussed in Chapter 3.
242	19	21000	For HU Standard 2, Alternatives C and D protect lynx diurnal security habitat from ski area development or expansion only as a guideline, which is insufficient in our judgment.	Comment noted.
242	20	21000	For HU Standard 3, Alternatives B and C (identical) are adequate.	Comment noted.
242	7	21000	For VEG Standard 1, which protects against increases in the amount of unsuitable habitat, we are comfortable with the level of protection in Alternatives B, C, or D. Alternatives C and D increase flexibility (because of the greater scale the standard is applied to) for the use of prescribed fire.	Comment noted.
246	37	21000	Standard ALL S1, Alternative D. The Forest Service should use accepted protocols when proposing to implement new management techniques, i.e., using the Lynx Biology Team and Steering Committee to discuss the feasibility and implications of such techniques.	Comment noted.
246	41	21000	We acknowledge that the mosaic of habitat conditions that support lynx is	Comment noted.

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			in a large part shaped by large-scale events, such as fire. However, our understanding of how to apply that principle in the mountainous Southern Rockies is limited. The LCAS acknowledges this and recommends a broad-scale assessment to further our understanding of past and present landscape conditions. The broad-scale assessment referenced in the standard would provide for both lynx conservation and management flexibility.	
246	42	21000	Standard VEG S2. Under Alternatives C & D Standard VEG S2 has been converted to guideline VEG G7. Standard VEG S2 allows no more than a 15 percent change of lynx habitat on Federal lands in an LAU to an unsuitable condition in a 10-year period. The intent of the standard in the LCAS is to limit the rate of change of lynx habitat within an LAU to ensure sufficient habitat for lynx through time in each LAU. The LCAS recognized that while management actions are often designed to "mimic" natural disturbance events, they do not fully duplicate the complex ecological conditions created through natural disturbances. Furthermore, natural disturbances such as fire in lynx habitat are typically large, resulting in the maintenance of large blocks of contiguous suitable lynx habitat on the landscape through time. Management actions, on the other hand, typically affect much smaller patches on the landscape, potentially resulting in unnaturally high fragmentation of lynx habitat and reducing the ability to maintain or create the large blocks of contiguous suitable lynx habitat with which lynx evolved.	Comment noted. Guidelines are intended to be followed. During site specific project analysis if a guideline is not going to be met, the reason will be documented in that project decision.
246	49	21000	The Forest Service has informed the Department that the exemption for livestock grazing practices and activities added to alternatives B and C is a misprint and will be removed. The Department supports this removal.	Comment noted.
246	44	21000	Standard VEG S4. Alternative B meets lynx conservation needs. Under Alternative D, Standard VEG S4 was changed to a less-restrictive guideline, VEG G8, allowing for potentially inconsistent discretion in maintaining the 10 percent denning habitat minimum in the LCAS.	Comment noted. Effects to lynx are discussed in the Wildlife section in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	60	21000	The DEIS states that the cumulative effects described under Alternative B are similar to those under Alternative D with some "exceptions." The Department disagrees with this statement. Alternative B generally adheres to the recommendations in the LCAS. However, the DEIS shows that Alternative D will result in adverse impacts to lynx denning habitat, foraging habitat, and movement habitat and would, therefore, likely result in adverse effects to lynx. Please disclose the impacts on the long-term conservation and recovery of lynx in the SRMGA.	

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246	54	21000	As stated in the DEIS, Chapter 2 describes the proposed action that was developed to provide for the conservation and promote the recovery of lynx by maintaining or creating additional foraging, denning and linkage habitat while preserving the overall multiple-use direction in existing plans. Please identify in this chapter how the proposed exemptions in the standards for Alternatives C and D will promote conservation and recovery of lynx.	
246	53	21000	Table 2-2, Probability of Lynx Persistence, Alternative D: This part of the table compares the effects of the DEIS Alternatives on lynx persistence. It states that Alternative D would decrease the probability of lynx persistence, compared to Alternative B, but the chance of persistence would be greater under Alternative D than Alternative A. Alternative A is the No Action alternative that led to the "likely to adversely affect" determination in the 1999 Biological Assessment on existing forest plans. Please identify specifically how management under Alternative D would significantly increase the probability of lynx persistence when compared to Alternative A.	Comment noted. Effects to lynx are discussed in the Wildlife section in Chapter 3. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	52	21000	Table 2-2, Lynx Productivity, Alternative D: This part of the table compares the effects of the DEIS alternatives on lynx productivity. On one hand, it states that Alternative D would have effects similar to Alternative B for lynx productivity; however, it also states that exceptions in Standard ALL S1 and Standard VEG S5 may lead to adverse effects to lynx. The Department agrees that exceptions in Standard ALL S1 and Standard VEG S5 under Alternative D may lead to adverse effects to lynx. The Department does not agree that effects from Alternative D would be similar to those under Alternative B because Alternative B follows the general guidelines of the LCAS whereas Alternative D does not.	
246	59	21000	Chapter 3, Pages 16-41, Affected Environment and Environmental Consequences: This section of the DEIS describes the adverse effects to lynx that are likely to result if either Alternative C or D is implemented. In summary, the DEIS states that Alternative C would reduce denning habitat, adversely affect foraging habitat, but would maintain habitat connectivity. The DEIS states that adversely affect foraging habitat, but would maintain habitat connectivity. The DEIS states that adverse effects to lynx denning habitat, foraging habitat, and habitat connectivity are likely if Alternative D's Standards and Guidelines are implemented. The purpose of the lynx amendment is to replace the LCAS, but continue to promote the conservation of lynx and lynx habitat. As stated in the DEIS the Standards and Guidelines in Alternative D are likely to adversely affect	Effects to lynx are discussed in the Wildlife section in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.

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			lynx through significant negative impacts on denning habitat, foraging habitat and lynx habitat connectivity. Please identify how the preferred Alternative D will help promote the Southern Rockies Canada Lynx Amendment's goal of conserving lynx if it negatively impacts denning habitat, foraging habitat, and lynx habitat connectivity.	
246	11	21000	Standard ALL S2 should: 1) identify the basis for determining the effects of an action on lynx; 2) define short- and long-term effects; 3) clearly define those sorts of actions that result in only short-term adverse effects; or 4) preferably, be removed from consideration.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard
246	10	21000	The Department [of the Interior] disagrees that projects that deviate from important lynx standards and that may have adverse effects to lynx should be allowed to proceed under broad, general plan direction such as Standard ALL S2. The Department recommends that Standard ALL S2 as written be dropped from consideration in a final preferred alternative.	
137	9	21100	We urge the [FS] to tighten up the language in Alt. D, A, and B, especially VEG S5 and ALL S2 standards; also, to be more specific regarding the winter groomed trail requirements - especially (?) not expanding areas of compaction of snow - this is critical to lynx survival.	
246	2	21000	The Proposed Action, Alternative B, would sufficiently replace the LCAS and meet the Purpose and Need for action. The Department believes that the Preferred Alternative, Alternative D, does not meet the Purpose and Need. The analysis, as it is written currently, does not address the effects of each Alternative adequately to provide assurance that management actions under the Preferred Alternative D would adequately promote lynx conservation and recovery in the Southern Rocky Mountain Geographic Area (SRMGA).	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	29	21000	The Department recommends that the exemptions in ALL S1 be removed from consideration in the final preferred alternative. The exemptions do not contribute to streamlining the Section 7 consultation process nor do they provide adequate regulatory mechanisms that would lead to recovery and delisting.	
9	1	21100	I am in favor of Alternative A [because of the] lack of historical evidence that lynx were ever in this area.	Comment noted.
10	1	21100	I am in favor of Alternative A [because] I believe that the lynx are not native to this area and that it is an introduction and not a re-introduction as the CDOW would have the public believe.	Comment noted.
16	1	21100	I am in favor of Alternative A, no action in regards to the Draft	Comment noted.

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			Environmental Impact Statement (DEIS) for the Southern Colorado Rockies Canada Lynx Amendment. I don't have anything against the lynx; I just think they need to be able to survive the way things are now. When it was first talked about introducing the lynx in this area it was agreed that no special consideration would be given to the lynx, they needed to be able to survive on their own.	
19	1	21100	I am in favor of Alternative A [because] your change is multiple use not use for one purpose such as the Lynx or any other single use management.	Comment noted.
37/1; 44/1; 102/1; 151/1; 155/1	1	21100	I am in favor of Alternative A.	Comment noted.
40	1	21100	I am in favor of Alternative A. I don't want to change anything we have rights to today, but I think it is nice to see Lynx and moose. I don't think snowmobiling and 4-wheelers don't hurt 1 thing regarding any wildlife.	Comment noted.
45	1	21100	I am in favor of Alternative A. I would like to see the lynx thrive in this area. However, if you limit the public from their lands using the Lynx as a reason, you will ensure the demise of this species here.	Comment noted.
50	1	21100	I am in favor of Alternative A. Give more usage; not less.	Comment noted.
51	1	21100	I am in favor of Alternative A. I'm not in favor of anything that has to with restricting any of the backside/four wheel trailing - Either the Lynx will adapt to the trailing or they shouldn't be around in the area.	Comment noted.
54	1	21100	I am in favor of Alternative A. I am not in favor of any alternative that may impose more restrictions on outdoor use or backcountry travel.	Comment noted.
55	1	21100	I am in favor of Alternative A. Retired people need a way to get into the forest if we can't walk.	Comment noted.
64	10	21100	The No Action alternative (Alternative A) inappropriately assumes that future Forest Plan management direction will not incorporate lynx protections in the absence of this Programmatic EIS. "No Action" includes the White River Forest Plan Revision and the same direction in the Preferred Alternative of the Medicine-Bow Forest Plan Revision (in process). Therefore, "No Action" would likely incorporate direction in Forest Plan revisions that is similar to Alternative B, providing greater resource protections that Alternative D.	The analysis for the DEIS was originally not intended to address the White River NF. The analysis for the DEIS was completed prior to the release of the Medicine-Bow Forest Plan, however the DEIS was released after the Medicine-Bow Forest Plan Revision decision. The SR Lynx amendment is designed to provide consistent direction throughout the Southern Rockies. The FEIS will correctly note the "No Action" for these two forests is similar to Alternative B.
64	13	21100	The No Action Alternative should have included likely management direction in future Forest Plan revisions, not existing management direction, and should have established a baseline for existing resource	Comment noted.

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			conditions as well. Instead, the DEIS treats No Action as future conditions with no lynx management direction, contrary to actual changes in recent Forest Plan revisions and legal requirements, for comparison to action alternatives.	
98	5	21100	If hybrids to in fact exist, that should serve as proof that the lynx ought not to be here at all, being too distant from sustainable habitat. If genetic purity is to be addressed via the ESA, then perhaps this DEIS is not required at all. There is simply no need to file an amended plan. I know you're trying to be fair and thorough, and appreciate that, and suppose there has been pressure from the wildlife agencies involved, to force management changes. [Therefore], Alternative A must be chosen. There are several reasons why this program can be seen as well planned or carried out or examined, for the particular region being affected. Perhaps placing lynx near the Canadian border would be more sensible. If the lynx were to survive here on their own, for a number of years, without further human intervention or policy/management changes, perhaps revisiting the subject would be scientifically helpful then.	Comment noted. No hybridization has been documented in the western U.S.
101	1	21100	Alternative A would be my first choice, as I don't think the lynx program needs any actions to help them exist. Mother nature will take her course whether they thrive or not, and we as citizens shouldn't lose our rights to public land because of a transplanted lynx.	Comment noted.
109	20	21100	I urge you to pick Alternative A, No Action Alternative	Comment noted.
116	1	21100	Please stay with Alternative A as it is working well without change and the Lynx are existing under the program.	Comment noted.
121	1	21100	CCA supports and encourages the USFS to adopt Alternative A of the EIS. Additionally, CCA encourages the active and productive efforts of the Colorado Lynx Stakeholder's Group as an avenue in developing inclusive, well thought out solutions to lynx management. CCA further recommends that this stakeholder's group be expanded to include southern Wyoming.	Comment noted.
154	1	21100	I am in favor of Alternative A because the best alternative is to leave "as is" no reason for change!!	Comment noted.
202	1	21100	The CWGA encourages the Forest Service to adopt Alternative A, and continue utilizing current forest management plans, along with participating in Colorado Department of Natural Resources stakeholder group meetings to resolve lynx management issues.	Comment noted.
242	2	21100	Alternative A, the "No Action" alternative, as indicated does not sufficiently deal with threats to lynx and their habitats and will likely result in continued	Comment noted.

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			listing for lynx under the Endangered Species Act with additional restrictions on land use, recreation, and other activities. For this reason we do not further consider Alternative A.	
243	1	21100	We support Alternative A (no action) because we already have multiple use on the forest which needs to be maintained at all levels.	Comment noted.
243	2	21100	We support Alternative A (no action) because you don't even know if the lynx will survive or stay where you put them. You don' even know if they will survive or stay where you put them.	Comment noted.
2	4	21200	Regarding lynx protections and recovery, please consider the following: Adopt a strengthened Alternative B because it represents the recommendations made by Lynx Biologist Team in the "Lynx Strategy."	Comment noted. Alternative B represents the management direction most closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
3	1	21200	For the successful repatriation of this charismatic cat to the ecoregion, the USFS must include language in its final plan that will secure real protection for the species and its habitat. Adopt an alternative guided by the recommendations laid out in the Lynx Strategy (a strengthened Alternative B).	
6	2	21200	Adopt a strengthened Alternative B because it represents the recommendations made by the Lynx Biologist Team in the "Lynx Strategy".	
2	5	21200	Regarding lynx protections and recovery, please consider the following: Strengthen standard "VEG S5" in Alternative B to protect snowshoe hare habitat from all vegetative management projects that threaten their winter habitat, including but not limited to pre-commercial thinning.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
21	1	21200	I urge you to strengthen Alternative B as well as VEG S5 which protects snowshoe hare habitats.	
6	3	21200	Strengthen Standard "VEG S5" in Alternative B to protect snowshoe hare habitat from all vegetative management projects that threaten winter snowshoe hare habitat, including but not limited to pre-commercial thinning.	
2/6; 6/4		21200	Regarding lynx protections and recovery, please consider the following: Strengthen standard "HU S1" in Alternative B so that there is no net increase in snowmobile routes inside or outside of "baseline areas" to protect lynx from their impacts.	Comment noted.
64	93	21200	Greater resource protections that are provided in management direction under Alternative B also could result in greater recreation benefits, which is likely to provide the greatest socioeconomic values in most Colorado National Forests.	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not

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				anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
64	54	21200	One approach [in providing a more thorough evaluation of cumulative impacts] would be to retain management direction as Standards until biologists on the interagency lynx team agree that adequate research supports conversion of any Standards to Guidelines. In general, the direction in Alternative B is more consistent with lynx conservation and recovery. The USFS proposes to change many Standards in the LCAS to discretionary Guidelines where research and monitoring information regarding effects to the lynx are limited.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
64	26	21200	The interagency lynx team biologists were concerned about applying the VEG S1 Standard to limit disturbance over 30 percent of unsuitable habitat to "each LAU or in combination with immediately adjacent LAUs. We encourage the VEG S1 Standard for Alternative B to adequately protect lynx.	Comment noted.
64	30	21200	The proposed VEG S5 and S6 Standards in Alternative B appear to establish sound limits on vegetation management activities like precommercial thinning while allowing appropriate vegetation management to restore declining tree species and ecosystems.	Comment noted.
64	81	21200	Fish and other aquatic resources, soils, vegetation, other wildlife, and nearly all environmental resources are improved by Alternative B relative to Alternative D, and possibly relative to existing conditions. EPA supports Alternative B for improvement to soils, water quality, watershed integrity, and aquatic resources.	Comment noted.
64	31	21200	The proposed VEG S5 and S6 Standards in Alternative B appear to establish sound limits on vegetation management activities like precommercial thinning while allowing appropriate vegetation management to restore declining tree species and ecosystems. It would be appropriate to clarify conditions where snowshoe hare habitat would be a focus of such restoration treatments.	Comment noted.
64	8	21200	Management direction in Alternative B, with some modifications, may provide for more effective lynx conservation, meet the requirements established for lynx restoration and recovery in the LCAS and Biological Opinion, and meet the overall Purpose and Need. As the Environmentally Preferred Alternative among those considered, we recommend Alternative B as the Preferred Alternative.	Support of Alternative B noted.
64	4	21200	The Proposed Action, Alternative B, was developed to support the findings	Alternative B was designed to incorporate the LCAS.

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			in the LCAS and has a number of stated environmental and resource advantages besides lynx conservation and recovery, including: better protections of aquatic resources and species, better protection of nearly all terrestrial wildlife and plants that are of concern in Colorado National Forests, enhanced non-motorized recreation, financial savings to the Forest Service, and other significant benefits. We support the direction established in Alternative B to more fully protect the human and natural environment.	
64	15	21200	EPA recommends Alternative B as the Environmentally Preferred Alternative. Alternative B comes closest to complying with Section 7 (a) (1) of the endangered Species Act to recover the species by including management direction to limit or avoid adverse impacts to lynx and support its habitat and other needs. We recommend that the USFS work closely with the FWS to meet the ESA requirements. Alternative B also is noted to provide greater conservation effectiveness for other environmental resources.	Additional information has been reviewed and considered for the development of the other action alternatives. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
71	3	21200	Strengthen Standard VEG S5 in Alternative B to protect snowshoe hare habitat from all vegetative management projects that threaten snowshoe hare habitat.	
71	2	21200	We are in support of a strong Forest Service amendment to protect the lynx as well as crucial lynx habitat. Please use recommendations made by the Lynx Biologist team in adapting a strengthened alternative B.	
77	11	21200	The DEIS states, "Alternative B is designed to address activities on NFS lands that can effect lynx and their habitat." DEIS at S-3. In order for this analysis to survive scrutiny under NEPA, each of the action alternatives must, in fact, be so designed. Otherwise, the DEIS is a sham intended to support the selection of Alternative B as the only viable alternative. Through omission of this statement under the other action alternatives, the DEIS implies that the others are not even designed to meet the purpose and need for the project.	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
80	2	21200	Strengthen VDGS5-Alternative B to protect the snowshoe hare within the vegetative mgmt project that's threatens winter snowshoe hare habitat and no exceptions for logging, drilling or other harmful activities.	Comment noted.
80	1	21200	I am urging you to adopt a strong forest service amendment to protect the lynx population in the Southern Rockies by implementing a strengthened Alternative B that is recommended by Lynx biologists in the Lynx strategy group study.	Comment noted.

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86	1	21200	I recommend the USDA adopt alternative B.	Comment noted.
86	5	21200	Alternative B is clearly more advantageous to sustaining and increasing the lynx population than alt.'s C or D.	Comment noted.
87/2; 149/3	2	21200	We support and urge the Forest Service to adopt a slightly modified version of Alternative B. In fact, we do not believe that either of the other action alternatives (C or D) are legal alternatives as a result of their insufficient protections for lynx and lynx habitat, and, in particular, their wild departure from the recommendations of the lynx biologist team that prepared the [LCAS].	Comment noted.
126	14	21200	The Forest Service fails to justify why it did not select the "Proposed Action" (Alternative B) as its "Preferred Alternative" Alternative E. The [FS] does not explain or justify its selection of Alternative E as its "Preferred alternative," which is especially puzzling given that the [FS] has already agreed to the implementation of the "Proposed Action" (Alternative B) by signing the LCAS, and in fact is legally bound to implement Alternative B under the terms of a FWS biological opinion (USDI 2000).	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
133	1	21200	The Southern Rockies Canada Lynx Amendment DEIS was developed to provide for and manage the habitat for Canada Lynx in seven national forests of Colorado and Wyoming. Alternative B admirably attains this objective. It should be adopted. Fuel reduction, pre-commercial thinning and snowmobile trails are adequately provided for in alternative B. These three lesser considerations do not require social treatment by other proposed alternatives.	Comment noted.
138	4	21200	Preferred Plan - B	Comment noted.
144	1	21200	I favor alternative B: the Lynx must have an environment without interruption of man. In places that this cannot be avoided, such as campgrounds, and recreational places - Lynx habitat zone would be enforced. The Lynx and Bobcat are sacred to Comanche; historically the Shoshone were once part of the Comanche people. So the Lynx and Bobcat are culturally and spiritually connected to the Tribes.	Comment noted.
149	5	21200	The Forest Service must adopt an alternative that offers protections no weaker than those found in the current Alternative B and should, in fact, improve Alternative B in several key respects. Specifically we urge the [FS] to adopt Alternative B with the following modification: Standard HU S1 must be strengthened to limit snowmobiles in lynx habitat to designated routes and play areas only, to allow no net increase in snowmobile routes	Comment noted.

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			or play areas in lynx habitat whether they are "designated" or not, and to actively reduce snowmobile routes and play areas where they are not known to be compatible with lynx restoration. The numerous exceptions detailed in the DEIS should be eliminated.	
149	4	21200	The Forest Service must adopt an alternative that offers protections no weaker than those found in the current Alternative B and should, in fact, improve Alternative B in several key respects. Specifically we urge the [FS] to adopt Alternative B with the following modification: Standard VEG S5 must be expanded from pre-commercial thinning to include all vegetative management projects that reduce winter snowshoe hare habitat.	Comment noted.
149	6	21200	The Forest Service must adopt an alternative that offers protections no weaker than those found in the current Alternative B and should, in fact, improve Alternative B in several key respects. The lynx amendment must specifically incorporate the 38 critical linkages as designated by the Forest Service and fully incorporate the linkage management recommendations of the LCAS. It must also require appropriate highway mitigation (including underpasses and overpasses) for lynx within these linkages.	Comment noted.
150	26	21200	To the extent it merits any mention at all in the DEIS, the snow compaction theory should be accurately described as unproven, untested speculation. Moreover, Human Use Objective 1 for all action alternatives, and Human Use Standard 1 for Alternatives B and C, DEIS at S-12, rest on the snow compaction hypothesis, should be eliminated.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003). The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In

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				<p>northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).</p> <p>In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.</p> <p>The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.</p> <p>If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.</p>

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159	1	21200	I urge you to adopt a strengthened Alternative B because it represents the recommendations made by the Lynx Biologist Team in the Lynx strategy.	Comment noted.
159	2	21200	[Alternative B] would strengthen the standard VEG S5 to protect snowshoe habitat from vegetative management projects that would affect, especially under stories of balsam for and Englemann spruce. There is a good population of snowshoe hares in that area that feed on the low hanging branches and seedlings of subalpine fir and Englemann spruce.	Comment noted
165	4	21200	I urge you to adopt Alternative B so that meaningful protection and recovery of the Canada Lynx can occur.	Comment noted.
168	4	21200	(cont. from cmt no.3) The Forest Service must, in this instance, conduct a delicate balancing act in restoring out forests to structures and compositions that are both natural and sustainable, with full regard for both ecological resources such as lynx populations, as well as providing for human needs.	Comment noted. A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
168	3	21200	BRC strongly opposes Alternative B. Alternative B limits management flexibility and management alternatives and results in little or no benefit to the lynx or its habitat. In general, BRC opposes the "hands-off" management approach embodied in Alternative B. The "Ecosystem Conceptual Model" or whatever term the FS uses to describe the theoretical construct of how ecosystems form, change and relate to wildlife species, that serves as the basis for Alternative B is, in our view, deeply flawed. The assumption underlying Alternative B and any other alternative that severely limits human manipulation of forest resources is apparently based on the philosophy embodied in conservation biology. Without going into unnecessary detail, those assumptions appear to be: (1) The pre-European-settlement forests were shaped largely by fire, both lightning and Indian-ignited fire, that were frequent, widespread, and generally of low intensity; (2) Settlers wiped out Indian-ignited fire, suppressed most of the lightning-and human-ignited fires, logged, built roads, invaded and modified wildlife habitat and; (3) Modern forests are thus highly unnatural, the primary factor contributing to native species decline. Conservation biology teaches the natural ecosystem will be restored if we just stop logging, close roads, reduce recreation and re-introduce frequent low-intensity fire, prescribed fire. In other words, the forest will fix itself if we just stop doing the wrong things. BRC believes these assumptions are deeply flawed. The awkward facts: (1) modern forest have structures and compositions radically different from historical natural forests; (2) large human populations now occupy forests and/or depend on them for	

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			essential commodities and functions, ranging from timber and water to recreation and safety; and (3) both law and regulation provide for human uses that did exist in the "pre-settlement" forest.	
74/3; 172/2; 176/2; 178/2; 180/2; 181/2; 183/2; 188/1; 189/1; 190/2; 192/1; 194/1; 198/3; 201/2; 206/2;	2	21200	1) Adopt a strengthened Alternative B because it represents the recommendations made by the Lynx Biologist Team in the "Lynx Strategy"; 2) Strengthen Standard "VEG S5" in Alternative B to protect snowshoe hare habitat from all vegetative management projects that threaten winter snowshoe hare habitat, including but not limited to pre-commercial thinning; 3) Strengthen Standard HU S1 in Alternative B so that there is no net increase in snowmobile routes inside or outside of "baseline areas" to protect lynx from the impacts of snowmobiles; 4) The lynx management plan should not include exceptions for logging, drilling, or other potentially harmful activities; 5) The management provisions outlined in the Lynx Strategy should be adopted as standards, which are required, not as discretionary guidelines.	Comment noted. Alternative B was designed to incorporate the LCAS. Additional information has been reviewed and considered for the development of the other action alternatives. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need
177	1	21200	Because we believe the land owned by all US citizens should be managed based on facts and science, we support Alt B, which is based on the LCAS. We are disappointed that very narrow political views have created a preferred alternative (D), which prefers backcountry logging, oil and gas development and snowmobiling to lynx and other wildlife habitat.	A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
184	1	21200	I support Alternative B of the Southern Rockies Lynx Amendment DEIS. Alternative B is the least intrusive and manages the forest resource best for Lynx recovery. Please support Alternative B.	Comment noted.
191	2	21200	I would also like to see certain areas of Alternative B strengthened, in particular, "VEG S5" -- habitat for snowshoe hare should be protected from thinning.	Comment noted.
191	1	21200	I feel that Alternative B is the best alternative because it represents recommendations from the lynx biologist team. If we want to make any authentic effort at protecting this endangered species, then we will list to the opinions of scientists.	Comment noted.
195	2	21200	There is no reason to believe that mechanical thinning would reduce wildland fire risk, yet lynx would definitely be adversely affected by declining habitat acreage brought about by alternative D. Therefore, alternative B would be the best alternative.	Comment noted.
197	1	21200	I urge you to adopt Alternative B, as this includes most of the proposals cited by the US Fish and Wildlife Service biologists as critical to preserving	Comment noted.

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			lynx habitat and prey long-term. The San Juan Mountains and wilderness areas, in particular, deserve more stringent protection measures, including diminishing the number of snowmobile trails, and ensuring the protection of the snowshoe hare, by not thinning crucial old-growth stands. Research in Canada's boreal forests has demonstrated that both the lynx and snowshoe hare need largely undisturbed old-growth conifer habitat to ensure long-term population viability. As the lynx is now considered a 'threatened' species under the Endangered Species Act, it is essential the the Forest Service work to secure a long-term future for this cat and prey species in the remaining old-growth wilderness ares of the San Juan Mountains.	
200	1	21200	I support alt B and the strengthening of VEG 5 including a ban on precommercial thinning. Further I favor no net increase in snowmobile traffic (HU S1). Snowmobiles have no place in this area at all. Do not make exceptions for commercial activities.	Comment noted.
203	2	21200	I support alt B and the strenthening of VEG 5 including a ban on precommercial thinning. Further I favor not net increase in snowmobile traffic (HU S1). Snowmobiles have no place in this area at all. Do not make exceptions for commercial activities.	Comment noted.
211	1	21200	The CWF believes that the USFS preferred alternative (i.e., D) does not adequately provide for the conservation of the lynx. We recommend selection of Alternative B as the preferred alternative because, as stated in the Abstract, it "reflects the proposed action described in scoping and would adopt the LCAS, edited for clarity.	Comment noted.
211	19	21200	Vegetation Standard 4: The exceptions described for Alternative B when the affected area is smaller than 5 acres are acceptable. However, the "defensible fuels profiles" language should be deleted from the exemptions for this alternative. That language is too vague and could be applied to any vegetation management action anywhere on a forest and at any time. The CWF believes that use of this language/process undermines the adequacy of the regulatory mechanism for maintaining adequate denning habitat across the landscape.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
216	1	21200	We call on USFS Region 2 to implement vegetation management, habitat protections, and monitoring provisions for Alternative B as an acceptable public compromise of maintaining winter recreation and allowing for wild land urban interface fuel treatments while increasing probability of lynx persistence in the Southern Rockies.	Comment noted.
216	6	21200	Alternative B should be the agency alternative. The latter is fine resource	Comment noted.

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			stewardship when compared to the Alternative D cop-out.	
229	3	21200	Part of Alternative B is the requirement for sufficient snowshoe hare habitat, protected from logging, thinning, or other vegetation management. Please therefore adopt the strongest possible approach to snowshoe hare habitat protection - and strengthen the VEG S5 in Alternative B.	Comment noted.
229	2	21200	The lynx biologist team which prepared the Lynx Conservation Assessment and Strategy stressed the importance of Alternative B. Please adopt this as part of the management plan.	Comment noted.
230	2	21200	Alternative B incorporates conservation measures that manage vegetation in the best interest of the lynx, reduces snow compaction and maintains connectivity within and between habitat areas. Furthermore, the U.S. Fish and Wildlife Service has analyzed these conservation measures in formal consultation and concluded that, adopting them would not likely jeopardize the continued existence of the lynx. The conservation measures would provide management direction that would likely result in maintenance of sufficient habitat quantity, quality, distribution and conditions to allow the species to maintain breeding populations within most historic habitats.	Comment noted.
230	1	21200	The NWF strongly supports the selection and implementation of Alternative B for the conservation and recovery of Canada Lynx. This alternative is based on science and includes the applicable conservation measures necessary to conserve the lynx. This alternative was developed from the Lynx Conservation Assessment and Strategy (LCAS), which is based on the best available scientific knowledge and recommendations. It is NWF's belief that our national forest should be managed using the best available science.	Comment noted.
235	39	21200	LINK G1 in Alternative B advocates National Forest System lands to remain in public ownership and the commentary (Chapter 3, Page 125) says that linkages should be in public ownership, and it is worth mentioning that a clear distinction be made that linkages in public ownership only be Forest Service Lands.	Comment noted. The amendment applies to National Forest System lands only.
235	17	21200	[The State of] Colorado acknowledges the inherent conflict between maintenance of lynx foraging and denning habitat and the critical need for hazardous fuel reduction and creation of defensible space. Yet alternative B and the ALL S1 Standard, both of which advocate for enhanced foraging habitat, cause concern by virtue of its severity	Comment noted.
242	3	21200	Alternative B most fully adopts the recommendations of the (LCAS), and offers the best protection for lynx habitat. Although this strategy perhaps	Comment noted.

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			offers the greatest assurance of short and long-term recovery and security of lynx population, it may do so in several cases by being overly restrictive.	
242	16	21200	For the Human Use Management Activities and Practices category (HU), we prefer Alternative B. For HU Standard 1, Alternative B restricts further development to areas presently impacted.	Comment noted.
242	8	21200	For VEG Standard 2, pertaining to timber management practices, we support Alternative B which maintains the prescriptions of the LCAS as a standard, which the Forest Service must enforce, as opposed to a guideline.	Comment noted.
59	2	21300	We would like to go on record as supporting Alternative C. Activities resulting in snow compacting may affect Lynx productivity and regulatory directions limit new snow compacting areas. At the same time the ability there is flexibility to address the snow compacting standard in some LAU's to see if increased recreational use can occur without adverse effect to Lynx's ability for predation provides balance in alternative C.	Comment noted.
59	3	21300	Alternative C allows for fire thinning close to dwellings and fire use practices to help restore Lynx habitat. We support the focus of using the limited resources of forest management agencies to make it safe for homes first and then doing what is possible to improve the nature habitat for Lynx and other species.	Comment noted.
59	1	21300	We would like to go on record as supporting Alternative C. Forest Management activities such as timber harvest, thinning, grazing, fire, etc. are regulated so as to not allow unsuitable habitat standards not affecting Lynx is in place.	Comment noted.
124	2	21300	The Board of County Commissioners supports Alternative C, allowing flexibility to protect both human safety and forest health, while providing substantial protection for lynx habitat.	Comment noted.
136	4	21300	Alternative C permits the Forest Service to continue salvage harvest near human communities for its defensible fuels program (VEG S4), but restricts fuel treatments in areas that might be important to lynx, but are normally distant from human communities (VEG S3). I believe that Alternative C is the best choice to sustain a viable lynx population while permitting reasonable human use of the Southern Rockies ecosystem.	Comment noted.
150	51	21300	Human Use Guideline 10, Alternative C, requires lynx foraging habitat improvement projects to offset projects that "result in a permanent conversion of winter foraging habitat..." DEIS at S-14. The Forest Service should clarify that the responsibility and cost of undertaking a habitat	Comment noted. Providing for foraging habitat improvement projects in other areas of lynx habitat would be identified by the Forest Service and could be completed as Forest projects or partnership projects.

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			improvement project rests on the Forest Service, not the ski area special use permittee. Unlike the Forest Service, the permittee has no authority or ability to propose or undertake a "habitat improvement project." And those projects will most certainly occur outside existing special use permit boundaries. The discussion in the DEIS could be misinterpreted to require the permitted ski area to fund and execute a lynx habitat improvement project. DEIS at 3-122. CSCUSA requests that the Forest Service add a sentence clarifying that the Forest Service bears the cost and responsibility of such a project.	
211	15	21300	Alternative C would use individual or a combination of lynx analysis units (LAU's) to apply the 30% unsuitable threshold when conducting effects analysis. The DEIS does not provide adequate spatial analysis for this alternative standard. The best scientific and commercial information available was used in preparing the LCAS. The LCAS provides guidance on the requirements of a lynx home range and the approximate size. By combining several LAU's, the effects would be diluted, and the likelihood of adverse effects to an individual lynx home range could rise to the level of take. However, take might not be detected due to the dilution of effect. Section 7 consultations are typically conducted by examining the effects to individuals of this species. By combining LAU's, the effects analysis would shift to several individuals who might be affected incrementally by the action. The CWF recommends that effects analysis should be limited to a single LAU for vegetation management actions.	Comment noted. Alternatives C and D allowed for the consideration of a combination of LAUs for application of VEG S1. Alternatives B and F apply the standard to individual LAUs.
211	16	21300	Vegetation Standard 2 (rate of change standard). This standard restricts timber harvest and salvage sales to changing 15 percent of lynx habitat within an LAU to an unsuitable condition within a 10-year period. For alternative C, this standard had been converted to a guideline. Conversion of this standard to a guideline greatly reduces its effectiveness. The intended purpose of the standard in the LCAS was to limit the rate of change of lynx habitat within an LAU to ensure that a LAU would provide sufficient habitat for lynx through time and could not be rendered incapable of supporting lynx by a single action of several actions over a short period of time.	Comment noted. A wide range of alternatives was considered. Alternative B provides direction within VEG S2. Alternatives C and D provides direction within guideline VEG G7. Alternative F provides direction within VEG S2. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
221	1	21300	We urge the USFS region 2 to implement Alternative C, though we feel even stronger vegetation management, habitat protections and monitoring provisions could be implemented.	Comment noted.
242	10	21300	For VEG Standard 4 pertaining to management following disturbance we support Alternative C, which protects both lynx and property by allowing	Comment noted.

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			for fuels-reduction management.	
242	13	21300	We support Alternative C, which protects both lynx and property by allowing for fuels reduction around developments.	Comment noted.
242	17	21300	For HU Standard 1, Alternative B restricts further development to areas presently impacted. Alternative C extends the no-net increase to all of the Lynx Analysis Units (LAUs) immediately adjacent to the impacted unit. In our judgment this does not afford lynx adequate protection from potential competitors taking advantage of compacted snow.	Comment noted.
11	2	21400	I am not highly in favor of any of the Draft Environmental Impact Alternatives as I think we have created this impact by wrongly introducing lynx where they should not be, but if I have no choice in the matter, then I am in favor of Alternative D which adds direction similar to Lynx Conservation Assessment and Strategy, but partially responds to concerns about restrictions on new snowmobile trails, precommercial thinning, fuel reduction projects associated with communities as risk of wildfires, and [modifies] standards to that they may be more flexible so as to address local situations and new information.	Comment noted.
13	1	21400	There are no known impacts to areas of Native American Cultural sites that are sensitive to this Tribe in regards to the amendment, however the Southern Ute Tribe prefers plan D. In the event of inadvertent discoveries of Native American sites, artifacts, of human remains, this Tribe would appreciate immediate notification of such findings.	Comment noted.
20/1; 38/1; 43/1; 92/1; 152/1; 228/1;	1	21400	I am in favor of Alternative D which allows flexibility in addressing what happens in our local forest.	Comment noted.
39/1; 42/1; 91/1;	1	21400	I am in favor of Alternative D in regards to the [DEIS] for the Southern Rockies Canada Lynx Amendment which allows flexibility in addressing what happens in our local forest.	Comment noted.
41/1; 46/1; 49/1; 53/1; 61/1; 65/1; 69/1; 120/1; 139/1; 142/1	1	21400	I am in favor of alternative D.	Comment noted.
47	1	21400	I support Alternative D. I love to snowmobile, ATV, snowshoe, cross country ski and hike.	Comment noted.
48	1	21400	I support Alternative D because (1) I have become convinced that there is no accurate historical evidence that the lynx (as opposed to the very similar looking bobcat) was ever in this area, (2) the chances of survival	Comment noted.

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			appear to be severely limited due to the natural 7-year cycle of the snowshoe rabbit (the primary food supply for the lynx) population and (3) it appears to be extremely irresponsible to place significant recreational (and therefore economic) activities of human beings (snowmobiling in particular) at risk by the introduction of a species that has little, if any, chance of long term survival in this area (as opposed to other areas from which it would be transplanted and where it has thrived without human interference).	
52	1	21400	The purpose of this letter is to state my preference for the adoption of Alternative D with respect to the Draft Environmental Impact Statement for the Southern Rockies Canada Lynx Amendment. It is my understanding that Alternative D would add direction similar to Lynx Conservation Assessment and Strategy while partially responding to concerns about restrictions on new snowmobile trails, pre-commercial thinning and fuel reduction projects associated with communities at risk of wildfires and while modifying standards so that they may be more flexible in addressing local situations and new information. I support this Alternative because (1) I have become convinced that there is no accurate historical evidence that the lynx (as opposed to the very similar looking bobcat) was ever in this area, (2) the chances of survival appear to be severely limited due to the natural 7-year cycle of the snowshoe rabbit (the primary food supply for the lynx) population and (3) it appears to be extremely irresponsible to place significant recreational (and therefore economic) activities of human beings (snowmobiling in particular) at risk by the introduction of a species that has little, if any, chance of long term survival in this area (as opposed to other areas from which it would be transplanted and where it has thrived without human interference).	Comment noted.
56	1	21400	As an outdoorsman and environmentalist I would like to see Alternative D instituted because of the needs of the small towns in this area.	Comment noted.
57	1	21400	I am in favor of alternative D. If these cats were never in Colorado, why restrict or eliminate use of land by everyone just to use our tax dollars for "keep busy" jobs.	Comment noted.
58	1	21400	I think the forest service has chosen the best alternative (D) for them to follow in managing the National Forest. There has to be a proactive plan to reduce the fuels in the Forest.	Comment noted.
60	1	21400	The purpose of this letter is to state my preference for the adoption of Alternative D with respect to the Draft Environmental Impact Statement for the Southern Rockies Canada Lynx Amendment. It is my understanding	Comment noted.

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			that Alternative D would add direction similar to Lynx Conservation Assessment and Strategy while partially responding to concerns about restrictions on new snowmobile trails, pre-commercial thinning and fuel reduction projects associated with communities at risk of wildfires and while modifying standards so that they may be more flexible in addressing local situations and new information. I support this Alternative because (1) I have become convinced that there is no accurate historical evidence that the lynx (as opposed to the very similar looking bobcat) was ever in this area, (2) the chances of survival appear to be severely limited due to the natural 7-year cycle of the snowshoe rabbit (the primary food supply for the lynx) population and (3) it appears to be extremely irresponsible to place significant recreational (and therefore economic) activities of human beings (snowmobiling in particular) at risk by the introduction of a species that has little, if any, chance of long term survival in this area (as opposed to other areas from which it would be transplanted and where it has thrived without human interference).	
62/1; 63/1; 132/1;	1	21400	I support Alternative D because I am an active snowshoer/ATV'er and this alternative would allow me to continue my recreational opportunities.	Comment noted.
64	92	21400	Timber outputs were the only output assigned monetary values in the evaluation of Present Net Value (PNV) of financial impacts (page 3-149). Even with that narrow evaluation of socioeconomic impacts, Alternative D is the worst alternative economically (most negative PNV).	The economic and social effects section has been revised. Narratives addressing recreation, timber, and fuels reduction have been added.
64	51	21400	Taken in sum, the activities noted to harm individuals in Alternative D would seem likely to affect the overall viability of the species.	Comment noted.
64	61	21400	We are concerned whether Alternative D will ensure adequate monitoring within the LAU's to determine whether more protections are needed.	Monitoring is identified in Table 2-1.
64	12	21400	Alternative D replaces Standards with Guidelines, allowing Forest managers flexibility to pursue activities that can be harmful to individual lynx and other resources.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
64	22	21400	The proposed ALL S2 Standard in Alternative D may not provide direction that will conserve and recover the lynx, as summarized by the DEIS (page 3-45). The lynx Biological Opinion says, "...For most agency actions, noncompliance with the standards in the LCAS increases the likelihood that actions would adversely affect lynx" (page 138).	
64	70	21400	Under Alternative D, "no net increase in authorized snow compaction" is a Guideline. Failure to implement the Standard (as is done in alternative B) is stated to potentially lead to additional negative impacts to individual lynx	The wildlife analysis discussed snowpack effects on lynx.

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			from competition for prey resources. No discussion is provided on how this Guideline will promote the conservation and recovery of the lynx or its prey. That discussion should be included in the Final EIS.	
64	11	21400	Alternative D direction could result in worse than existing conditions, as opposed to "No Action," for many resources and activities because it allows exceptions and exemptions to environmentally adverse activities that have not been implemented under existing conditions.	Comment noted. Alternative D was evaluated and anticipated effects displayed.
64	1	21400	We have concerns that the Preferred Alternative, Alternative D, goes beyond preserving the existing multiple-use direction in existing Forest Plans. Alternative D also does not appear to respond effectively to the stated Purpose and Need and would result in more adverse impacts than other alternatives.	Comment noted. Alternative D was evaluated and anticipated effects displayed. Alternative F was developed in response to comments and is included in the FEIS.
66	2	21400	I support Alternative D because I have become convinced that there is no accurate historical evidence that they lynx (as opposed to the very similar looking bobcat) was ever in this area.	Comment noted.
66	3	21400	I support Alternative D because the chances of survival appear to be severely limited due to the natural 7-year cycle of the snowshoe rabbit (the primary food supply for the lynx) population	Comment noted.
66	1	21400	The purpose of this letter is to state my preference for the adoption of Alternative D with respect to the Draft Environmental Impact Statement for the Southern Rockies Canada Lynx Amendment. It is my understanding that Alternative D would add direction similar to Lynx Conservation Assessment and Strategy while partially responding to concerns about restrictions on new snowmobile trails, pre-commercial thinning and fuel reduction projects associated with communities at risk of wildfires and while modifying standards so that they may be more flexible in addressing local situations and new information.	Comment noted.
67/1; 70/1	1	21400	After reading and studying the alternatives, I agree with the Forest Service that Alternative D is the practical manageable alternative for our National Forests. Alternatives B and C impose severe limitations that are not scientifically justified. In addition, Alternative D is the only alternative that allows the Local Forest Managers to actively manage our Forests. This is how I think it should be, since the local Forest Supervisors know what is going on in the forests, rather than some bureaucrat in Washington trying to figure out what is happening.	Comment noted
68	2	21400	Adoption of any other Alternative than Alternative D would only add expense, delay and additional regulation, when regulation of coal mining	Comment noted.

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			operations already occurs.	
75	1	21400	We believe that Alternative D is the most flexible alternative under consideration and does the best job of striking a proper balance between habitat protection and continued public access for legitimate economic purposes. Particularly gratifying to many of our members is the USFS's finding that energy exploration and development practices and energy transmission facilities need not pose a threat to lynx populations within the forests in question. Prudent development of domestic energy resources, carried out in a responsible manner, provides tremendous economic and security benefits to our nation. Given the impact that rising energy costs are having on U.S. consumers, delivery of additional supplies to the market has taken on additional urgency.	Comment noted.
78	2	21400	The adoption of the Preferred Alternative D would jeopardize all the work done to protect lynx and their habitat on the White River in two ways: first by isolating the White River from the rest of the Southern Rockies national forests, and secondly by creating pressure to amend the White River Forest Plan to conform to the lower standard adopted for the rest of Region 2.	Comment noted. The White River National Forest is included in the amendment area. Alternative F was developed in response to comments to ensure adequate regulatory mechanisms are in place to provide for lynx habitat.
86	6	21400	The only obvious logic behind the USDA's position of Alternative D is by order of the current administration. This approach [Alternative D] is based on very poor, or non-existent science.	Comment noted. Alternative F was developed to address comments received, and is the preferred alternative for the FEIS.
88	1	21400	Regarding the Canada Lynx recovery questions, I recommend Alternative D. Chapter 3 P7 Colorado was the southern edge of the range of the Lynx.	Comment noted.
95/9; 127/9	9	21400	We strongly recommend that this process to amend the forest plans be abandoned. The marginal improvements proposed in Alternative D are not adequate. Frankly, we do not see any benefit to mass amendment of the forest plans in Colorado and southern Wyoming to incorporate lynx direction that will undermine other uses of the national forests.	Comment noted.
96	1	21400	I prefer alternative D because it provides a broader range of alternatives and provides greater flexibility for multiple use management.	Comment noted.
96	2	21400	Alternative D is my choice as it partially responds to concerns about the restriction on new snowmobile trails, precommercial thinning, fuel reduction projects associated with communities at risk of wildfire. Best of all it modifies standards so they may be more flexible in addressing local situations and new information; as well as contributing to lynx conservation recovery.	Comment noted.
98	6	21400	On page 13 of the DEIS, regarding Alternative A, the report states "this	Comment noted.

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			alternative may not provide for lynx persistence and recovery..." (And how can one recover what one does not know existed anyway?). Alternative A might also reduce the public perception that this program is only another excuse to prevent the public from trespassing on its land, and does allow the NFS to keep its word that the public will not be adversely affected or limited. That's all to the good. And at the least, the NFS should not be put in the position of contributing to failed science. If a compromise is required, Alternative D is the only one permissible.	
99	4	21400	I am an active snowmobiler, snowshoer and I feel that alternative D would allow me to continue my outdoor activities.	Comment noted.
99	3	21400	I support the Forest Services' preferred Alternative D. The Snowshoe rabbit population has always been cyclical, that is to say, every 7 years the Snowshoe rabbit population decreases quite significantly.	Comment noted.
99/2; 119/1;	2	21400	I support [Alternative D] because there seems to be a lack of historical evidence that the Lynx was ever in this area. The lynx is native to boreal forests in Canada, not the forests of Colorado.	Comment noted.
99/1; 118/1	1	21400	I support the Forest Services' preferred Alternative D.	Comment noted.
100	1	21400	Grand County is in support of Alternative D, which is similar to the [LCAS], but allows for fuel reduction projects, maintaining recreational values and necessary infrastructure maintenance.	Comment noted.
105	2	21400	As an avid recreationist in the forest I feel very cheated that many of the changes happening to the Land Management Plan have not considered recreation opportunities enjoyed by so many forest users. Alternative D seems to offer some protection of the rights of recreationists as well as other forest users.	Comment noted.
105	1	21400	My choice is the preferred Alternative D. It appears to be the least restrictive to the other uses of the forest.	Comment noted.
103/1; 104/1; 107/1; 108/1; 111/1; 112/1; 114/1; 160/1; 162/1	1	21400	After reviewing the four alternatives, I support the Forest Services' preferred Alternative D. I support it because the Canadian Lynx is a foreign species for this State, never having been a permanent resident. I further support the FS in their analysis, when considering the economic impact that arbitrarily closing or limiting the forest would have on the mountain communities that depend on the access to the forest by local residents and visitors alike.	Comment noted.
113	2	21400	Alternative D would offer some protection from unfair regulations designed to protect an unthreatened species in an inappropriate habitat.	Comment noted.
119	2	21400	I am in favor of Alternative D. The population of the Snowshoe rabbit is	Comment noted.

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			cyclical, which means the food source for the lynx decreases significantly every 7 years. Without this food source, the lynx would not survive.	
119	3	21400	I am in favor of Alternative D. The lynx introduction proposal has no scientific evidence that it will even work.	Comment noted.
119	5	21400	I am in favor of Alternative D. The presence of snowmobile trails have not been scientifically proven to affect lynx survival. If snowmobile trails are closed along with other winter sports, many small towns in our area will be devastated by the loss of revenue. We live here year around so we are greatly concerned that other summer activities might be included in this "ridiculous proposal."	Comment noted.
123	2	21400	Alternative D adds direction similar to the Lynx Conservation Assessment and Strategy, but modifies standards to allow flexibility for fuel reduction projects, local situations and new information. Alternative D is am more comprehensive alternative, and one we readily support.	Comment noted.
123	1	21400	We support Alternative D because this alternative provides for the protection of the watersheds from risk of wildfire and the resulting water quality impacts.	Comment noted.
129	1	21400	I am in favor of the Forest Service's Agreement supporting Alternative D in the Management Alternative for our National Forests. I do not support the introduction of the Canadian Lynx into Colorado. I'm asking you to not support their experiment any longer.	Comment noted.
130	1	21400	The Board of County Commissioners is in favor of Alternative D concerning the Draft Environmental Impact Statement (DEIS) for the Southern Rockies Canada Lynx Amendment.	Comment noted.
131	3	21400	We especially support Alternative D's inclusion of the standard ALL S2, which allows a project proposal to deviate from one or more of the lynx standards without amending the Forest Plan, if a written determination is made that the project is not likely to adversely affect the lynx or if the project may result in short-term adverse effects the lynx but would result in long-term benefits to the lynx and its habitat, subject to ESA requirements. By allowing project-level consideration of the impact of a proposed action on the lynx and its habitat, this standard prevents the Forest Plans from imposing unduly burdensome requirements that do not result in any net conservation benefit to the lynx. Because Alternatives B and C do not include this ALL S2 standard, Alternative D better achieves the Act's goal of balancing multiple-use interests and conservation of the lynx.	Comment noted.
131	2	21400	Alternative D also best responds to the significant issues raised during the	Comment noted.

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			public scoping period regarding the negative impacts the proposed Lynx Amendment may have on public safety and human uses, while still providing for the conservation and recovery of the lynx. In particular, it lessens these potential negative impacts by listing certain lynx conservation measures as permissive guidelines rather than mandatory standards. This approach offers the greatest amount of flexibility to conserve the lynx while still allowing the appropriate level of multiple-use under the Forest Plans.	
131	1	21400	We support the Forest Service's identification of Alternative D as the preferred alternative because it strikes the appropriate balance between protection of the lynx and the requirement of the National Forest Management Act that Forest Plans provide for multiple use, including outdoor recreation.	Comment noted.
137	8	21400	The new Alt D has much too much room for vagueness and exceptions and will not adequately protect Canada Lynx in Southern Colorado (and Northern New Mexico dispersal areas).	Comment noted. Alternative F was developed in response to comments received and removes some of the vague measures.
137	6	21400	The average acres of annual precommercial thinning and regeneration harvest acres in the preferred Alt. D basically stay similar to what they are now. This will negatively affect lynx, and an alternative should have been developed that reduces this average.	Comment noted. Precommercial thinning in non-lynx habitat would be anticipated to be similar over time.
137	1	21400	We are concerned that the DEIS and preferred FS Alternative D, fail to include any areas of the Carson National Forest. Since lynx have dispersed to the Carson NF from Colorado and to Northern new Mexico - it is important to include Carson NF in this amendment especially areas adjacent to the So. San Juan Wilderness and Weiminuche Wilderness and Wolf Creek Pass and Chama areas.	Comment noted.
137	11	21400	We recommend strengthening the standards especially in Alt. D; also, more attention should be given to dispersal habitat, and its protection, and to disturbance from roads and timber projects and, the Carson and Santa Fe National Forests need to be included in these alternatives.	Comment noted. The Carson and Santa Fe National Forests are outside the scope of this analysis.
138	1	21400	Alternative D expedites FS give - aways under the guise of wildfire management.	Comment noted.
140/6; 141/4	6	21400	I would ask that as you evaluate alternatives, please know that I recommend Alternative D, which partially responds to some of the concerns that I have enumerated and directionally reduces some of negative impact on continued effective forest management and access for the hundreds and thousands who enjoy the responsible use of the San	Comment noted.

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			Juan Mountains in Southern Colorado.	
148	6	21400	The DEIS conclusion that "...Alternative D...contributes to lynx conservation and recovery..." is contrary to the well documented conclusions of LCAS. Alt D advocates vegetation manipulation and road building which are clearly detrimental to lynx. Alt D advocates vegetative manipulation of high elevation forests which is contrary to evolutionary history and would actually aggravate the fire hazards it promises to reduce.	Effects are discussed in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
149	39	21400	The analysis of Alternative D is even more slanted. The DEIS summarizes this alternative by explaining that: Alternative D was designed to go even further in responding to the key issues than Alternative C while still contributing to the conservation of the lynx. It was developed to provide a broader range of alternatives and provides greater flexibility for multiple use management. DEIS at Ch. 2 p. 18. Yet once again the analysis is nearly exclusively focused on the ways in which Alternative D will provide for more human uses. The analysis does not even address the "key issues" it claims motivated the reduction of lynx protections. The following points are characteristic of this entire analysis: Standard ALL S1 was modified to provide assurance that collaborative fuels reduction and fossil fuels projects would not be affected by the standard. DEIS at 19. Standards VEG S1 and S3 were modified to provide assurance that collaborative fuels reduction projects would not be affected by the standard. Id.	Comment noted. The purpose and need is to provide conservation of lynx as well as provide for multiple uses on National Forest System lands.
149	9	21400	The preferred alternative, Alternative D, represents a remarkable departure from the best available science and the recommendations of the lynx biologists responsible for the LCAS. As such, it passes neither biological nor legal muster. Alternative D fails in at least three general respects: 1) the preferred alternative eliminates many of the protections recommended by the LCAS; 2) the preferred alternative replaces many of the non-discretionary standards recommended by the LCAS with discretionary guidelines; 3) Where the preferred alternative still includes standards, those standards are generally gutted with numerous and sweeping exceptions for logging, oil and gas drilling, and other activities known to be harmful to lynx and lynx habitat.	Effects are discussed in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
150	55	21400	Alternative D and Snow Compaction. The DEIS concludes that Human Use Guideline 10 of Alternative D will harm lynx due to snow compaction concerns: HU G10, under Alternative D, has direction on no net increase in authorized snow compaction as a guideline. Deviations to the no net	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate

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			<p>increase direction at the project level could lead to additional negative impacts to individual lynx from competition for prey resources, depending on how often the HU G10 guideline is applied at the project level. DEIS at 3-43; see also DEIS at 3-20 (same). As stated throughout our comments the snow compaction hypothesis has been rejected by the Fish and Wildlife Service and has no basis in the literature. E.g., Lynx Report at 36-39. It is highly arbitrary and irrational for the Forest Service to rely upon snow compaction theorizing to conclude that Alternative D would lead to a lower probability of lynx persistence when compared to Alternatives B and C.</p>	<p>competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time” (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003). The DEIS Chapter 3, page 18 stated “Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that “Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey.” (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005). In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most</p>
216	5	21400	<p>Simply monitoring annual increases in snow compaction activities and extent of fuels treatment projects in lynx habitat as proposed in Alternative D is rear-view mirror habitat management and a failure to embrace your own exemplary habitat analysis as well as good conservation biology</p>	
246	58	21400	<p>Chapter 2, Page 19, Alternative D: While the best scientific and commercial data available do not indicate that grazing or snow compaction are threats to lynx conservation and recovery at this time, adverse effects to individual lynx could result from these activities if the guideline is not followed.</p>	
246	56	21400	<p>Chapter 2, Page 19, Alternative D: We recommend that the Forest Service replace the phrase in the 10th bullet, "U.S. Fish and Wildlife Service's determination that livestock grazing/snow compaction is not a threat to lynx" with the phrase, "U.S. Fish and Wildlife Service has no information at this time to indicate that snowtrail compaction is a threat to lynx."</p>	

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				<p>significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.</p> <p>The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.</p> <p>If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.</p>
150	57	21400	<p>We hope that these comments are helpful to the Forest Service in completing its analysis, preparing a final environmental impact statement, selecting lynx management direction, and issuing a record of decision. We reiterate our support for Alternative D as modified by our comments. Whichever alternative the Forest Service selects, we urge the Forest Service to incorporate the balanced flexibility that is offered in All Standard 2 and other features of Alternative D. That flexibility provides ample protection for lynx while giving the agency the ability to achieve its multiple use goals.</p>	<p>Comment noted. Alternative F was developed in response to comments received on the DEIS.</p>
150	56	21400	<p>Alternative D and All Standard 2. The second basis of the Alternative D probability of lynx persistence finding is All Standard 2. That standard would allow the Forest Service to exempt a site specific project from any lynx standard if "a written determination is made that the project is not likely to adversely affect lynx" or "long term benefits to lynx and its habitat would result." DEIS at S-5. By its terms, All Standard 2 could be relied upon to exempt a site specific project from a particular lynx standard only where no adverse effects to lynx would occur, or where lynx would receive long term benefits. Despite that fact, the DEIS repeatedly concludes that "the exceptions allowed under All S2 could result in adverse effects." DEIS at 3-40. Elsewhere the DEIS states that "All S2 reduces the effectiveness of the standards," DEIS at 3-44, that "the All S2 standard could allow adverse effects to habitat in a number of LAUs" and "the All S2 exception to all lynx standards, may allow adverse effects to lynx habitat</p>	<p>Effects are discussed in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.</p>

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			components and connectivity across the SRMGA." DEIS at 3-47. The above conclusions form the basis of the Alternative D lynx persistence findings. They are illogical, arbitrary, and do not have a rational basis. All Standard 2 could be employed only if the [FS] concludes "that the project is not likely to adversely affect lynx" or if "long term benefits to lynx and its habitat would result." DEIS at S-5. How can this standard ever lead to the "adverse effects" predicted in the DEIS, and identified as the basis of the low lynx persistence finding for Alternative D? It is deeply problematic that the [FS] believes that adverse effects to lynx will occur if it exercises its judgment based on the best available science that no adverse effects to lynx will occur. That logic does not support the conclusion that Alternative D will provide a low probability of lynx persistence.	
150	2	21400	Alternative D (and to lesser extent Alternative C) provides flexibility that is not available under Alternative B. It is critical that the Forest Service retain flexibility in its lynx management direction for the Southern Rockies. Lynx science is not static - it changes and evolves as the Forest Service, United States Fish and Wildlife Service, and Colorado Division of Wildlife learn additional information about the degree to which lynx are capable of adapting to human uses of National Forests. Flexible lynx management direction will allow the agency to tailor its future decisions to incorporate the best available science while fully protecting lynx. And the United States Fish and Wildlife Service plans to designate critical habitat for lynx in the Southern Rockies over the next two years. Adaptive lynx management direction will give the Forest Service the tools to best respond to the critical habitat designation.	Comment noted. The FWS designated critical habitat in 2006; this decision is being reviewed. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
150	4	21400	CSCUSA requests the Forest to strike the lynx persistence conclusions about Alternative D from the DEIS.	Comment noted.
150	5	21400	Lynx management direction for all the Southern Rockies should be flexible, adaptive, and consistent. The WRNF lynx direction does not offer those qualities, especially because it arbitrarily would impose static, inflexible standards and guidelines for part of Colorado while the rest of the state may be subject to different management direction. There is no reason why the flexible lynx direction proposed in Alternative D should not apply within the WRNF.	Comment noted. The White River National Forest was added to this amendment effort and will have the same lynx management direction as the balance of the forests.
150	10	21400	All Standard 2 of Alternative D should be incorporated into the selected alternative. This will help avoid "analysis paralysis" will provide ample lynx protection, and will help achieve the agency's multiple-use goals.	Suggestion noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F,
150	52	21400	All Standard 2 applicable to Alternative D provides flexibility by allowing	

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			the Forest Service to exempt a site specific project from any lynx standard if "a written determination is made that the project is not likely to adversely affect lynx" or "long term benefits to lynx and its habitat would result." DEIS at S-5. CSCUSA supports the flexibility that All Standard 2 would provide, especially because that flexibility would never, by definition, compromise lynx conservation.	the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
152	4	21400	I value the use of the forest. I do not want restrictions to be placed on these activities because of the potential of lynx.	Comment noted. The purpose and need is to provide conservation of lynx as well as provide for multiple uses on National Forest System lands.
153	1	21400	I support the reintroduction of Canada Lynx to Colorado, and Alternative D.	Comment noted.
161	1	21400	I agree with the Forest Service that Alternative D is the most practical and manageable alternative for our National Forests. Alternatives B and C impose severe limitations that are not scientifically justified. In addition, Alternative D is the only alternative that allows the local Forest Managers to actively manage our Forests. This is how I think it should be, since the local Forest Supervisors know best about what is going on in the Forests, rather than some bureaucrat in Washington trying to figure out what is happening	Comment noted.
168	1	21400	BRC supports Alternative D.	Comment noted.
168	11	21400	BRC strongly supports the addition of Standard ALL S2 allowing projects to go forward if, although short-term adverse effects to lynx may occur, long-term beneficial affects o the lynx would result.	Comment noted.
175	1	21400	The State and County have spatial buffers of 1/2 mile, and temporal buffers from May 1-June 30 and December 1-April 15 to provide protection for big game during critical time periods and locations from disturbance from machines and dogs. Jim stated Alternative D won't provide spatial or temporal buffers for lynx. He observed that Colorado provides more protection for big game species than the Federal Alternative D would provide for lynx, a listed threatened species. He is concerned that the lynx, as a listed species, needs more protection than Alternative D provides.	Comment noted.
177	6	21400	Alternative D is a huge disappointment that gives consideration for lynx, other MIS/TES, the great majority of taxpayers, and the entire ecosystem, only if it convenient for the few beneficiaries of subsidize drilling (executive order 1322), subsidized backcountry logging ("A collaborative approach.") It is surprising that the fire plan has the gall to include the word "communities" in the title, while allowing the taxpayers' money to be	Comment noted.

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			diverted to high elevation forest, miles from any structures. A compromise on this item, that would require, or nearly require, this money to be spent where it actually helps protect communities from fire, and preserves lynx habitat, would help restore the FS credibility regarding both fire and wildlife.	
195	1	21400	Alternative D, the Forest Service preferred alternative, would actually contribute to the lynx's decline by reducing lynx habitat. The supposed benefit of alternative D would be greater flexibility in fuels reduction for wildland fire prevention. However, the evidence in Colorado points to the fact that wildland fires are not stopped by mechanical fuels reduction. They Hayman and Missionary Ridge fires stopped just after entering the Lost Creek and Weminuche Wilderness Areas, respectively, even though no mechanical thinning had occurred in these areas. By contrast, the area around Cheesman Reservoir, which was very heavily thinned, burned completely in the Hayman Fire.	Comment noted. Alternative F was developed in response to comments on the DEIS and discussed in the FEIS. All action alternatives would provide management direction for lynx habitat.
203	1	21400	I would like to go on record as supporting Alternative D. I believe this alternative would most benefit the reintroduction of the Canada Lynx based on recent scientific study.	Comment noted.
208	3	21400	Alternative D is insufficient to protect lynx and should be rejected or modified for more protective measures. It is not surprising that this is the preferred alternative, given the direction from this administration, but it is certainly disappointing and disheartening.	Comment noted. Alternative F was developed in response to comments on the DEIS and discussed in the FEIS. All action alternatives would provide management direction for lynx habitat.
209	1	21400	The selected alternative D is probably the best out of the 5 available since the no action alternative will most likely be challenged legally. I would like to add that I hope the USFS and the [USFWS] should consider the ramifications of their decisions not only based on solely habitat but also on the likelihood that many of the action plans that seem to be developed to meet the endangered species act in the past tend to eliminate or severely restrict access for commercial as well as recreation and social uses. This direction has done more to make the general public resent the animal that you are trying to protect than you could imagine. This direction has not only put the animal in question in social jeopardy, but it has also led major declines in confidence with the general population regarding the operation and function of the USFS and [USFWS]. Please do not make this error again when it comes the lynx. In addition the lynx should only be protected in areas that have population problems. If a healthy lynx population exists in an area, do not implement the amendment in that area. Leave our recreation and access to the federal lands alone. We have had enough	Comment noted.

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			restrictions put on us already. Don't put this animal in social jeopardy as you have done with other species such as the grizzly bear. It is about time the USFS and [USFWS] started listening to the average guy and not just to the environmental groups.	
211	17	21400	Vegetation Standard 3: It is unclear why this standard is provided an exemption for Wildland Fire Use, and why alternative D includes an exemption for Fire Plan activities. If a LAU where exemptions were to be implemented did not provide sufficient denning habitat, it may result in significant effects and a high potential for "taking" of lynx denying the appropriate shelter for its young.	Part of the purpose and need for this amendment is preserving the overall multiple-use direction in existing Forest Plans. Along with preserving overall multiple-use goals is the need to meet other direction such as the Healthy Forest Initiative and the National Fire Plan. Alternatives varied by standards and guidelines,.
211	9	21400	The "ALL S2" exemption for Alternative D would allow any projects to proceed, including when they deviate from the lynx standards and guidelines, without amending a forest plan but subject to ESA requirements, under 2 conditions: (1) The determination for the project is "not likely to affect" lynx; (2) short-term adverse affects will occur but will result in long-term benefits to lynx. The exemption makes little sense. First, it is unclear regarding what entity would be making the effects determination for lynx, or any other federally listed species. In addition, the DEIS does not clarify what information or standard would be used to make such effects determinations. The USFS should explain the rationale for this approach, identify who will be making such determinations, and describe the scientific information such determinations will be base upon. We suggest the "Canada Lynx Conservation and Strategy" (LCAS) continue to be the basis for such determinations.	Comment noted. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
211	12	21400	We recommend that exemption from the "ALL S2" standard be removed from consideration in the final decision. The exemption has no real value for lynx conservation. It is too broad, effectively exempting any projects authorized by the USFS, which defeats the purpose and need for the action described in the DEIS. Depending on how they are implemented, implementing these exemptions in Alternative D could result in serious adverse effects to lynx in the SRMGA.	Comment noted. ALL S2 was not included in Alternatives B, C a Comment noted. Alternative F was developed to respond to comments and does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
242	6	21400	We believe Standard All S2 in Alternative D to be inadequate in that it allows management activities and practices to go forward if they deviate from one or more lynx standards as long as a written, no-adverse affect determination is made, or if long-term benefits to lynx or its habitat would result. It is not clear how any management activity that deviated from one or more standards, which are designed to protect lynx and their habitat, could be found to have no adverse affect. Even if that were possible,	

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			short-term adverse effects and long-term benefits are not defined or quantified. Without restrictions on the scale of proposed projects, and clear definitions of short and long-term, this standard inadequately protects lynx and lynx habitat.	
211	8	21400	The CWF recommends that the exemptions for "ALL S1", be removed from consideration in the final decision on the preferred alternative. If those exemptions would be implemented along with the rest of Alternative D, they could appreciably reduce the likelihood of survival and recovery of lynx in the SRMGA. Therefore the DEIS should include detailed information and a clear conclusion regarding the effects of the "ALL S1" exemption for Alternative D. The document should clearly state what the effects could be if connectivity cannot be maintained within the Southern Rockies, and it should point out that if persistence of lynx in the ecosystem cannot be maintained, then alternative D does not meet the purpose and need for the action.	Comment noted. Effects are discussed in Chapter 3. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
217/1; 218/1;	1	21400	After studying and reading the alternatives, I agree with the Forest Service that Alternative D is the most practical and manageable alternative for our national forest.	Comment noted.
227	1	21400	I am in favor of Alternative D in regards to the Draft Environmental Impact Statement (DEIS) for the Southern Colorado Rockies Canada Lynx Amendment which allows flexibility in addressing what happens in our local forest.	Comment noted.
227	4	21400	Please do not restrict our forests because of the small area that we use for snowmobiles. Alternative D is the most flexible to allow us to use the forest. Please choose Alternative D.	Comment noted.
235	42	21400	[The State of] Colorado challenges the "Rationale for Outcomes" rating Alternative D as offering a "lower likelihood of persistence of Canada Lynx". The ALL S2 exception, although unclear as to its short and long-term value, still requires a written determination that a proposed project will not adversely affect lynx.	Comment noted.
235	21	21400	VEG S1: [The State of] Colorado supports Alternative D in this standard due to provision for fuels treatments. Interestingly enough, the level of unsuitable habitat currently ranges from 3-8%, so a relaxed application combining LAUs and allowance for fuels treatment is appropriate.	Comment noted.
235	23	21400	VEG S2: [The State of] Colorado supports Alternative D as a guideline. Once again, unsuitable habitat under current practices ranges from 3-8%, and the likelihood of that changing due to current fiscal limitations is	Comment noted.

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			negligible. Alternative D maintains flexibility.	
235	24	21400	VEG S3: [The State of] Colorado supports Alternative D, once again primarily because of flexibility in fuels treatment.	Comment noted.
235	19	21400	[The State of] Colorado acknowledges the inherent conflict between maintenance of lynx foraging and denning habitat and the critical need for hazardous fuel reduction and creation of defensible space. Colorado supports these management alternatives recommended in Alternative D, and specifically Alternative D under Standard VEG S5, in order to actively pursue fuels reduction as a means for creating defensible space and allowing for fuels treatment.	Comment noted.
235	18	21400	Colorado acknowledges the inherent conflict between maintenance of lynx foraging and denning habitat and the critical need for hazardous fuel reduction and creation of defensible space. Alternative D, "permits Fire Hazard Reduction Thinning to be conducted within the structure ignition zone and in landscape setting critical for the development of defensible fuels profiles" (DEIS, p.108) and it is the alternative wherein "firefighter and public safety is not adversely affected." As for any direct threat to lynx denning and foraging habitat, Alternative D proves workable inasmuch as identified lynx habitat affected ranges from 67,000 to 80,000 acres in a ten-year period (DEIS, pp.98-99), especially since much of the fuels treatment is in non-lynx habitat.	Comment noted.
242	14	21400	We specifically oppose Alternative D because these protections are guidelines and not standards.	Comment noted.
242	11	21400	For VEG Standard 4 pertaining to management following disturbance we do not support Alternative D for this standard because protecting denning habitat becomes only a guideline.	Comment noted.
242	18	21400	For HU Standard 1, Alternative B restricts further development to areas presently impacted. Alternative D further erodes this protection by making it a guideline.	Comment noted. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101).
246	26	21400	The Department recommends that the Medicine Bow National Forest not be included in the proposed Canada lynx amendment since the Medicine Bow National Forest Plan contains conservation than does the preferred Alternative D in this DEIS.	Comment noted.
246	36	21400	Standard ALL S1, Alternative D. The DEIS estimates the amount of lynx habitat considered for fuels reduction to total 611,150 acres, which constitutes 7 percent of the lynx habitat within the amendment area. The DEIS goes on to discuss that only 80,000 acres of the full 611,150 would	Thank you for noting that discrepancy. Appendix B has been reviewed and updated to include this reference.

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			actually be treated within the next 10 years based on documentation from Finney (2001). This reference is not listed in the section on literature cited.	
246	38	21400	Standard ALL S1, Alternative D. The Forest Service should use accepted protocols when proposing to implement new management techniques, i.e., using the Lynx Biology Team and Steering Committee to discuss the feasibility and implications of such techniques.	Comment noted.
246	39	21400	Under Alternative D, Standard ALL S1 does not apply to fossil fuel exploration and development practices, nor to energy transmission facilities associated practices and activities. Please identify why these activities should be exempt from the Forest Plan Amendment Standard ALL S1.	The purpose and need for this amendment is to establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices on national forests in the Southern Rockies, while preserving the overall multiple-use direction in existing Forest Plans. Along with preserving overall multiple-use goals is the need to meet other direction such as Executive Order 13212, Actions to Expedite Energy Related Projects.
246	57	21400	Chapter 2, Page 19, Alternative D: We recommend that the Forest Service replace the phrase in the 11th bullet, "U.S. Fish and Wildlife Service's determination that livestock grazing is not a threat to lynx" with the phrase, "U.S. Fish and Wildlife Service has no information at this time to indicate that livestock grazing is a threat to lynx."	Comment noted.
246	64	21400	Because the Southern Rockies Lynx Amendment DEIS documents that the Preferred Alternative D may not ensure that management would provide for lynx recovery, the Department cannot advise the Forest Service to adopt Alternative D as written.	Comment noted.
246	63	21400	Alternative B in the DEIS most closely follows the direction found in the LCAS. The Southern Rockies Canada Lynx Amendment DEIS identifies the goal of the amendment to be to conserve Canada lynx, and then goes on to describe how the Preferred Alternative D will result in adverse impacts to lynx denning habitat, foraging habitat, and movement habitat. It is stated further than Alternative D may not ensure that management requirements are implemented that would provide for lynx persistence and recovery. The Department questions how the implementation of Alternative D will result in a situation that differs significantly than what the situation was in 1999 when the Forest Service and BLM determined that their land management plans were likely to adversely affect Canada lynx, and that the LCAS was needed to promote the conservation of lynx and lynx habitat.	Comment noted. Effects are discussed in Chapter 3. Alternative D includes management direction for lynx habitat, although some items are presented as guidelines instead of standards. The addition of direction for units lacking lynx habitat management direction would provide for habitat. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	61	21400	Please clarify how Alternative D will meet the Southern Rockies Lynx	

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			Amendment DEIS goal of conserving Canada lynx while resulting in a lower likelihood in persistence of Canada lynx than would occur under management based on the LCAS.	
246	55	21400	Please explain how Alternative D will provide for lynx persistence and recovery in the Southern Rocky Mountains since it also does not include many of the conservation measures in the LCAS.	
246	33	21400	Standard ALL S1, Alternative D. The Department recommends that specific elements, identified as guiding processes by the Forest Service, be identified and addressed individually in the Standards and Guidelines.	Comment noted.
246	14	21400	Currently, under Alternative D and the collaborative fuels treatment process, precommercial thinning would be allowed within lynx habitat within the Wildland Urban Interface (WUI). However, the size of the WUI has not been defined. We suggest defining the WUI, such that precommercial thinning activities are restricted to within 1 mile of structures to minimize the adverse affects to lynx as a result of implementing these activities within lynx habitat.	Comment noted. The definition of WUI used for the FEIS analysis is the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101.)
246	13	21400	Under Alternative D, VEG S5, we believe it may be acceptable and appropriate to use some precommercial thinning within lynx habitat to reduce forest fuel accumulations to protect structures and for other objectives. We support development of clearly defined "sideboards" to guide where and under what conditions such precommercial thinning activities would occur within lynx habitat.	Comment noted.
246	9	21400	The Department believes that some short-term adverse effects to lynx and lynx habitat may be irreversible in the long term. Standard ALL S2 does not meet the intent of Alternative D to efficiently address the issue of wildland fire risk and contribute to lynx conservation. If projects fitting Standard ALL S2 are infrequent, a more efficient route would be to leave clear, strong plan direction in place (e.g., eliminate ALL S2), and deal with these infrequent projects through site-specific plan amendment.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
246	6	21400	ALL S2, under Alternative D, provides no direction for the basis or standard of information that would be used to determine whether a project is likely to adversely affect lynx. We anticipate implementation of ALL S2 could lead to confusion resulting in delays in planning and consultation	

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			that have largely been overcome through use of the LCAS.	
246	12	21400	Under Alternative D, Standards VEG S1, VEG S3, and VEG S5 include a provision exempting fuel treatment projects that are identified through collaborative processes, such as that described in A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy Implementation Plan from adherence to the particular standard's criteria. We recommend caution in exempting a broad range and unknown number of actions from plan direction. As currently worded, this exemption is sufficiently vague that it does not allow an adequate analysis of the potential effects upon lynx or lynx habitat under implementation of Alternative D.	
246	5	21400	ALL S2, under Alternative D, provides no direction for the basis or standard of information that would be used to determine whether a project is likely to adversely affect lynx. We agree with the DEIS conclusion that this lack of direction would cause inconsistency in application of measures to conserve lynx.	
246	4	21400	Standard ALL S2 in effect nullifies other lynx standards in the plan. The DEIS on page 35, Table 2-2, Chapter 2, indicates that implementation of ALL S2 under Alternative D may result in adverse effects to lynx productivity, mortality, and movements. It also indicates on pages 16-41 of Chapter 3 that possible adverse effects to foraging habitat, denning habitat, and lynx habitat connectivity could occur if Alternative D were to be implemented.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
246	1	21400	Alternative D will allow the greatest multiple-use management flexibility compared to the other alternatives; however, it will deviate significantly from recommendations in the LCAS. The Department understands the Forest Service's objective to implement a plan that will allow for a high degree of multiple-use flexibility and adaptive management. We also support the efficient implementation of fuel treatment projects to reduce forest fire risks to people and property. However, the Department stresses that Forest Service and BLM land management plans must contain direction that results in actions that conserve lynx and lynx habitat, to fully meet the Purpose and Need stated in the DEIS (page S-1).	
246	3	21400	Our primary concerns are with portions of Alternative D, as they contain broad exemptions from proposed lynx standards or from important standards recommended in the LCAS.	
246	32	21400	Standard ALL S1, Alternative D. The Department recommends that actions identified in the DEIS that will be exempt from the Forest Plan	Comment noted. ALL S1 is a standard that provides for maintaining habitat connectivity and this includes vegetation

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			Amendment standards be clearly documented in the Final EIS. The Department would advise caution in exempting a broad range and unknown number of processes and activities from the Forest Plan's standards.	treatments. The results of this fuels treatment allowance under Alternative D within lynx habitat was expected to be somewhat limited. The estimated potential treatment acres under the fuels exception allowed under Alternative D over a
246	34	21400	Standard ALL S1, Alternative D. The effects analysis in the DEIS states also that "with no limits defined within the standard (exemption), there could be adverse effects to individual lynx, as well as the Southern Rockies lynx population, if high quality foraging habitat is not maintained in a well-distributed fashion." The Department agrees with this assessment, and believes that the risks to the SRMGA may be worse than the Forest Service anticipates, since this alternative is limited by the standards and guidelines of the LCAS.	ten year period was slightly more than one percent of lynx habitat. The treatments would be targeted adjacent to communities. This exception is not included in Alternative F Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	15	21400	Currently, under Alternative D and the collaborative fuels treatment process, precommercial thinning would be allowed within lynx habitat within the Wildland Urban Interface (WUI). However, the size of the WUI has not been defined. From our understanding of the exemption language in VEG S5, Alternative D, fuel treatment projects (including precommercial thinning) could move forward in areas outside WUI, if deemed necessary, without adherence to VEG S5. Again, considering the importance of winter snowshoe hare habitat to lynx populations, this broad exemption renders analysis of the effects of this exemption on lynx difficult.	The results of this fuels treatment allowance under Alternative D within lynx habitat was expected to be somewhat limited. The estimated potential treatment acres under the fuels exception allowed under Alternative D over a ten year period was slightly more than one percent of lynx habitat. The treatments would be targeted adjacent to communities. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
246	23	21400	The DEIS identifies that Alternative D is the Forest Service's preferred alternative. However, Alternative D does not appear to be consistent with the Forest Service's stated Purpose and Need for the Southern Rockies Canada Lynx Amendment. Page S1 of the DEIS states that "The purpose and need for the proposed amendment is: To establish management direction that conserves and promotes the activities and practices on the Southern Rockies National Forests, while preserving the overall multiple-use direction in existing Forest Plans." Please elaborate on how Alternative D is consistent with the purpose and need for the Southern Rockies Canada Lynx Amendment.	Alternative D includes management direction for lynx habitat, although some items are presented as guidelines instead of standards. The addition of direction for units lacking lynx habitat management direction would provide for habitat.
246	28	21400	Ultimately, the analysis concludes that consistent repetitive application of these exemptions could reduce the likelihood that the Canada lynx population would have the ability to persist in the SRMGA. The Forest Service should adequately explain the effect of Alternative D on the likelihood of survival and recovery of lynx in the SRMGA. If connectivity	Although the Alternative D had some adverse effects, the alternative still met the stated Purpose and Need. A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered

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			cannot be maintained within the Southern Rockies, and persistence of lynx in the ecosystem cannot be maintained, then Alternative D does not meet the purpose and need for the DEIS.	comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
109	12	23000	How will this DEIS work in the courts? When a judge hears arguments in an appeals case, he/she generally goes by the written document giving authority to land managers. Even the few, specific quotes I have referenced above might be the ones a judge could certainly use to uphold an agency directive to stop most management activities in the state. We live in a world of extremes - we have to look at what extreme paragraphs might be placed before a judge. This DEIS says exactly what it effects -- the entire state.	The amendment applies to lynx habitat on National forest System lands. Alternative F was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
137	13	23000	Alt. D fails to comply with the LCAS (p. 45 and 47, ch. 3) recommendations - a significant violation of the [APA] - arbitrary and capricious. Ignores USFWS Biological opinion.	Although the Alternative D had some adverse effects, the alternative still met the stated Purpose and Need. A wide range of alternatives was considered, including Alternative F which was developed in response to comments on the DEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
224	1	23000	The Forest Service should not proceed with forest plan amendments but should address lynx habitat locally and only after the USF&W Service designates lynx habitat and SIGNSA [?] Recovery Plan per the ESA law. Single-species dominant management is bad for the forest and likely not helpful to the species itself.	The FWS designated critical habitat in 2006. NFS lands were not included because a conservation agreement is in place and forest plan revisions/amendments are in progress. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service has consulted with the FWS to ensure Alternative F would provide lynx habitat direction to conserve the lynx. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS
235	9	23000	Many of the definitions, processes, geographic descriptions and other elements described in the appendices of the proposed amendments are cause for concern. These elements will serve as the predicate for establishing critical habitat. While many of these terms were developed in the LCAS, their practical and legal application will be put to the test in these Amendments and there is little hint of how severe and broad and application could be, or how widespread a Court could interpret these terms.	
2	9	23200	Regarding lynx protections and recovery, please consider the following: The fate of the restored lynx population in the Southern Rockies is precarious. Lynx face severe threats in the region, including inappropriate logging practices, ski resort developments, interstate highways, and irresponsible snowmobile use; therefore, full use of all Endangered Species Act preservation tools is necessary.	Comment noted.

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6	6	23200	My understanding is that [under the federal Endangered Species Act] the management provisions outlined in the Lynx Strategy should be adopted as standards, which are required, not as discretionary guidelines.	Comment noted. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
77	3	23200	The Forest Service must also adhere to the requirements of other federal statues such as the Multiple-Use Sustained Yield Act (MUSYA), among others. MUSYA requires that the public lands remain open to a wide variety of "intensive" uses, provide recreational opportunities of all types, and expand these opportunities as the public demand for them grows. Any document or project not in conformity with this edict is subject to reversal by the federal courts. Each of the Alternatives in the DEIS threatens to restrict, rather than expand, the scope of recreational use of the affected lands. However, the DEIS itself notes that snowmobile use in Colorado is increasing and expected to continue to increase in the future. See DEIS at Ch. 3-112. Opportunity must therefore be expanded to meet this anticipated increasing demand. Because each Alternative reduces snowmobile use from current levels, no decision made based upon the DEIS could possibly comply with MUSYA, and the DEIS must therefore be revised to comply with MUSYA.	Comment noted. Although one part of the purpose and need is to establish management direction that conserves and promotes the recovery of lynx, multiple use objectives are provided for and not eliminated as noted in the analyses. There are many laws, regulations and policies that apply to Forest Service activities which may limit some actions on specific areas to ensure protection of affected resources. For example, ground disturbing activities may be prohibited where adverse impacts to identified cultural resource sites the protection of cultural resource sites, eligible for listing on the National Register of Historic Places, would occur. However, this does not eliminate activities across all areas of the National Forests.
77	4	23200	Congress never intended the ESA to apply to areas where the species did not already exist. Giving such an interpretation to the ESA allows the executive agencies, such as the Forest Service, to expand their control and authority far beyond what Congress and their organic acts contemplated.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. The Southern Rockies is at the southern fringes of their range, however. Lynx have been historically documented as far south as Conejos County, in the very southern part of Colorado. The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. The two efforts are

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				unrelated; the USFS would be amending the Forest Plans for lynx habitat regardless of the state's efforts.
77	5	23200	The ESA requires designation of "critical habitat" in order for its most restrictive provisions to apply. Where, as here, the agency treats the area as if it were, in fact, critical habitat while it has not been so designated, the agency exceeds its authority and violates the ESA.	This is an incorrect interpretation of ESA. Federal agencies are required to conserve listed species and to consult with FWS on actions that may affect listed species or designated critical habitat. All forests in the amendment area have confirmed lynx sightings and are considered occupied.
95/35; 127/35	35	23200	ALL 01. This objective does not meet the definition of objective in 36 CFR 219 219.7. It does not contain a) measurable results, b) an estimate of the time required for accomplishment or c) an estimate of the resources needed for accomplishment.	The regulation cited in the comment refers to the 2000 planning regulations which were replaced by the 2005 and 2008 regulations. This proposal is being completed under the provisions of the 1982 regulations. The definition in the 1982 regulations 36 CFR 219.3 is "Objective: A concise, time-specific statement of measurable, planned results that respond to pre-established goals. An objective forms the basis for further planning to define the precise steps to be taken and the resources used in achieving identified goals."
95/40; 127/40	40	23200	VEG 01. This objective does not meet the definition of objective in 36 CFR 219.7. It does not contain a) measurable results, b) an estimate of the time required for accomplishment or c) an estimate of the resources needed for accomplishment.	The objectives proposed are measurable and in general, time specific. For example, ALL O1 states to "Maintain or restore lynx habitat connectivity in and between LAUs and in linkage areas." Any project or activity located in and between LAUs and in linkage areas would be designed to maintain or restore connectivity (measurable planned result); and generally would be done through that project (although all projects may not meet all objectives at one time, but may move towards an objective or be benign) - therefore it is time specific.
95/12; 127/12	12	23200	The Purpose and Need also indicates that adoption of the proposed management direction is needed to comply with National Forest Management Act (NFMA) requirements for viable populations of native vertebrate species. However, the proposed amendments do not comply with the 36 CFR 219 forest planning requirements, specifically, 36 CFR 219.27 (a) (5 and 6) which require diversity of plant and animal communities "to meet overall multiple use objectives" and adequate fish and wildlife habitat to maintain viable populations "consistent with multiple use objectives established in the plan" (emphasis added). The proposed amendments were designed solely for conservation and recovery of lynx, without consideration of "overall multiple use objectives" of the affected forest plans as required in the forest planning regulations.	Comment noted. Although one part of the purpose and need is to establish management direction that conserves and promotes the recovery of lynx, multiple use objectives are provided for and not eliminated as noted in the analyses. There are many laws, regulations and policies that apply to Forest Service activities which may limit some actions on specific areas to ensure protection of affected resources. For example, ground disturbing activities may be prohibited where adverse impacts to identified cultural resource sites the protection of cultural resource sites, eligible for listing on the National Register of Historic Places, would occur. However, this does not eliminate activities across all areas of the National Forests.

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106	47	23200	The failure to fully address threats to the lynx with adequate regulatory mechanisms is a failure to meet obligations to protect and restore lynx under both the ESA and the National Forest Management Act.	
106	1	23200	Although the proposed amendment takes steps in the right direction, ultimately it seems that the Region is failing to appropriately conserve the lynx under section 7(a)(1) of the endangered species act ("ESA"). The Region seems to believe that the management of the lynx must be balanced with the multiple-use mandates of the National Forest Management Act and the Multiple Use-Sustained Yield Act (see e.g. DEIS p.6, stating there is a need to preserve "overall multiple -use direction in existing Forest Plans"). While we are fully in support of multiple-use of our public lands, ultimately the USFS is obliged first and foremost to ensure conservation of the lynx and its habitat in accordance with the ESA. Section 7(a)(1) specifically requires agencies, like the USFS, to "utilize their authorities in furtherance of the purpose of this chapter by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this title." The affirmative duty to proactively conserve threatened and endangered species has been held a mandatory, nondiscretionary obligation that is crucial to ensuring proper and effective implementation of the ESA. See, Sierra Club v. Glickman, 156 f.3d 606 (5th cir. 1998). Thus the USFS's attempts to balance multiple use with lynx protection is glaringly inconsistent with the ESA.	Comment noted. The FS consulted with the FWS as well as considered comments on the DEIS in developing Alternative F, the preferred alternative in the FEIS to ensure adequate management direction would be provided to ensure regulatory mechanisms are in place for lynx habitat.
109	1	23200	The USFS should not issue blanket decisions that set forth public policy to amend individual forest plans. Experience shows that even setting forth these alternatives causes real management changes on national forest even before the decision documents are signed.	Comment noted. By through this amendment process there will be consistent direction throughout the Southern Rockies forests.
109	2	23200	You are not following the CFR 219 regulations which require consideration for multiple use management. You are forcing single species management and negating all the public collaboration that has gone in to building the forest plans on the forests covered by the DEIS.	
122	4	23200	As a clear example of single issue management, the [LCAS], on which the proposed amendments were based, is a self-described "conservative approach" to lynx management. Amending the direction from the LCAS into the forest plans makes all other forest plan Goals and Objectives subservient to lynx Goals and Objective, contrary to the Forest Service's multiple use mandate, the Forest Service's stated intent of preserving the overall multiple-use direction in existing forest plans, and the requirements of the Organic Act and National Forest Management Act.	Part of the purpose and need is maintaining multiple-use management direction. This amendment process has also included public involvement.

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119	4	23200	The lynx is thriving in Canada and the Northern US, so it should not be considered as a threatened species in our area since it has never been found here.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. The Southern Rockies is at the southern fringes of their range, however. Lynx have been historically documented as far south as Conejos County, in the very southern part of Colorado. The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. The two efforts are unrelated; the USFS would be amending the Forest Plans for lynx habitat regardless of the state's efforts.
149	2	23200	If the Forest Service intends to comply with the Endangered Species Act, the National Forest Management Act, and other relevant legal and regulatory duties, the final lynx amendment must comport with the best available science on lynx conservation and the recommendations made by top lynx biologists in the Lynx Conservation Assessment and Strategy (LCAS).	Comment noted. The best available information was considered in the development of the proposed action. New information and issues from scoping were used in the development of alternatives. Alternative F was developed between the DEIS and the FEIS to incorporate updated information.
149	46	23200	Failure to fully address threats to the lynx with adequate regulatory mechanisms is a failure to meet the Forest Service's obligations to protect and restore lynx under both the Endangered Species Act and the National Forest Management Act.	The Southern Rockies Lynx amendment includes the contiguous forests in Colorado to ensure a consistent strategy is in place. The Forest Service will complete consultation with the FWS on the selected alternative prior to issuing a Record of Decision.
149	51	23200	The Forest Service failed to comply with most of these duties [under law]. For the reasons discussed throughout this document, it failed to take a hard look at the impacts of the land use activities in question to lynx and lynx habitat. The absence of a reasonable assessment of the ways in which and extent of the numerous exceptions might be used fatally flaws the FS' assessment of potential impacts. The FS's analysis of the full range of effects, including direct, indirect, and cumulative, are flawed for the same reasons. The FS failed to explain what methods, if any, it used to assess the impacts of the numerous exemptions and departures from the recommendations of the LCAS.	Comment noted. The best available information was considered during this analysis. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
181	1	23200	Because the U.S. Forest Service is mandated to adhere to the March 2002 Endangered Species Act, your agency is required to protect lynx and its habitat. Without these protections, logging, oil and gas drilling and unfettered snowmobile use will continue to destroy lynx habitat, and individual lynx will face the genuine risk of being accidentally killed.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.

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235	14	23200	Should any alternative or management practice designated in these Amendments be determined to have any adverse effect on lynx or lynx habitat, the Forest Service will have to consult with the Fish and Wildlife Service under Section 7 of the Endangered Species Act.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
238	1	23200	The endangered Species Act requires the identification of critical habitat, but the Fish and Wildlife Service has failed to comply with that requirement to date. Amending the forest plans prior to the identification of critical habitat is premature and inappropriate.	The FWS designated critical habitat in 2006. NFS lands were not included due to following the conservation agreement. All forests in the amendment area have confirmed lynx sitings and are considered occupied. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. The FWS development process for a Recovery Plan is outside the scope of this analysis.
77	1	23210	NEPA requires the agencies to use the best available science and a sound scientific method. The DEIS reflects a dearth of both.	The best available information was considered in the analysis. Updated information has become available since the initial analysis and has been considered and information updated in the analysis document as appropriate.
106	8	23210	The USFS is also prohibited from "undertak[ing] in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment" while work on a programmatic EIS is in progress. In other words, while the USFS is developing its programmatic EIS for lynx management in Region 2, the agency cannot undertake major federal actions covered by the EIS that would significantly affect the quality of the human environment. The only exceptions to this prohibition are if: 1) The action is justified independently of the program; 2) The action is itself accompanied by an adequate EIS; or 3) The action will not prejudice the ultimate decision on the program (prejudice of the ultimate decision occurs when it tends to determine subsequent development or limit alternatives).	Comment noted.
149	34	23210	The preferred alternative represents a remarkable departure from the best available science (e.g., the Lynx Science Report) and the recommendations of the lynx biologists responsible for LCAS. The problems are both procedural and substantive. First because the preferred alternative incorporates so many sweeping exemptions and limitations on the application of the amendment's lynx protections, but fails to carefully analyze the extent to which these exemptions will be employed, it cannot	Comment noted. The best available information was considered during this analysis. Alternative B reflects the LCAS. Alternative D considered the USFWS determination issued July 3, 2003(Fed Reg. Vol 68. No 128 pp. 40076-40101). Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest

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			meet its NEPA duties to assess and analyze the potential environmental impacts of ongoing land uses authorized under existing Forest Plans nor of this amendment. The FS fails to consider the full range of direct, indirect, and cumulative impacts on lynx because, simply, it does not know the extent of the potential impacts that would be authorized under this amendment and the existing Forest Plans. The management recommendations, in the absence of any reasonable rationale or biologically credible basis, also violate the APA's prohibition on arbitrary and capricious actions. Simply wishing to allow for more land use than the LCAS would provide for, in the absence of the full disclosure required by NEPA and a credible determination that all of the FS' protective duties will be met, is insufficient.	Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
230	6	23210	We are concerned about the "All S1" standard. We are also concerned that individual forest and will not be evaluated in regards to the Southern Rocky Mountains Geographic Area (SRMGA). As discussed in a paper titled, Estimating the Cumulative Effect of Development on Wildfire Habitat, the authors found the "tyranny of small decisions made singly" occurs because "while each single land use change results in a negligible impact, the accumulation of these individual changes over time and within a landscape or region may constitute a major impact." We feel this document is woefully inadequate in addressing the cumulative impacts of Forest Service actions on lynx. We assert this is a fundamental violation of NEPA.	Comment noted. ALL S1 is a standard that provides for maintaining habitat connectivity and this includes vegetation treatments. The results of this fuels treatment allowance under Alternative D within lynx habitat was expected to be somewhat limited. The estimated potential treatment acres under the fuels exception allowed under Alternative D over a ten year period was slightly more than one percent of lynx habitat. The treatments would be targeted adjacent to communities. This exception is not included in Alternative F. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
230	8	23210	The effect analysis on page 30 of the DEIS states, "with no limits defined within the standard, there could be adverse effects to individual lynx, as well as the Southern Rockies lynx population, if high foraging habitat is not maintained in a well-distributed fashion." We do not believe this analysis meets the requirements of NEPA to fully analyze impacts of federal actions. To fully meet the requirements of NEPA the document should disclose the level of fuel treatment scheduled to occur in lynx habitat and analyze the impacts of these actions. If not possible at this time, then exemption should be eliminated.	Fuels treatments are discussed in the Fuels, Fire and Fire Ecology section. Fuels treatments will be proposed in site specific analyses, this analysis noted the anticipated amount that may be treated based on the areas that are within one mile and three miles of Communities at Risk were estimated to be 0.15-0.37% of the identified lynx habitat annually. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. Alternative F incorporates some limits to fuel treatments.
144	2	26000	The Forest Service should not make final decisions on any proposed action without the knowledge and input by the tribes and citizens.	Public involvement for projects would occur when actions are proposed. This analysis provides management direction.
64	29	30000	EPA supports restoring native forest habitats and natural processes (for	Comment noted.

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			example, Ponderosa pine and aspen systems). Where tradeoffs may occur, the impacts to lynx habitat versus the impacts to declining ecosystems need to be considered.	
8/7, 14/7; 146/7	7	30200	The DEIS fails to identify desired vegetation structures, desired landscape diversity and structural stages, potential prey habitat, and core areas of breeding habitat which may be the basis for population viability, if viable populations are even possible in the SRMGA.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed. The likelihood of long term lynx population persistence is also discussed.
14/9; 146/9	9	30200	While there is a general discussion of characteristics of lynx habitat in the Southern Rocky Mountain Geographic Area (SRMGA), there is no discussion about the desired condition of that habitat. The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the Desired Future Condition.	
145	2	30200	The national forests included in the Southern Rockies Lynx DEIS are at the periphery of lynx population distributions and have provided more than marginal lynx habitat or populations. Despite acknowledgements in the DEIS that many of the included areas have always been marginal lynx habitat, it is proposed to implement forest plan direction for the national forests in Colorado and southern Wyoming as though those national forests contain valuable habitat for the conservation of lynx.	The Southern Rocky Mountain Geographic Area has been deemed a Provisional Core Area in the Recovery Outline (FWS 2006). See BA, 2007.
8/8, 14/8; 146/8		30200	There didn't appear to be any discussion about the adequacy of current forest plan direction to provide adequate structural habitat diversity for lynx or to achieve historic or "natural" forest conditions for any of the affected national forests.	Comment noted. Current Forest Plans, with the exception of the White River and Medicine Bow National Forest Plans, lack direction to provide for lynx habitat. The purpose of and need for the amendment is to establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates adverse effects from land management activities and practices on the Southern Rockies national forests, while preserving the overall multiple-use direction in existing Forest Plans. The direction for lynx habitat management is to ensure adequate lynx habitat is provided. Adequacy of the current plans were evaluated in the No Action Alternative discussions. See Environmental Consequences of the No Action alternative on lynx in Chapter 3.
183	1	30200	As a citizen, I am extremely concerned about the many ways in which the US Forest Service has recently been acting on behalf of the current administration to turn its back on its mission of sustainably managing one of our nations greatest resources, in favor of short term management for commercial gains. The current act which reflects this is the US Forest Service bending to special interests by ignoring the science associated with lynx recovery efforts and reducing the protections for Lynx habitat in the "lynx strategy."	See Environmental Consequences of the No Action alternative on lynx in Chapter 3.
170	1	30200	I am currently a resident of Vermont, where we prize ourselves on progressive approaches to protecting the environment. In our state, eco tourism and alpine sports make up a substantial amount of our economy, so you can see why such protection is so important to our state's viability. With an ecologically unique history as Colorado, it seems that your state	Comment noted.

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			has provided the structure to address this concern.	
170	2	30300	I have visited Colorado once and I can't wait for a return visit. However, the idea of the Canadian Lynx population being decimated by logging and oil and gas drilling frightens me. Would I want to visit a state where the government passes inconsequential legislation that offers no real protection for the Lynx, or their Habitat? No, as a consumer I will exercise my right of choice. Keep Colorado wild and attractive. Allow business to develop with the environment in mind so that eco-friendly people can come and play in Colorado's greatness. Please create a STRONG Forest Service Amendment that would ensure the safety of the Lynx habitat.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
235	16	30300	Standard ALL S2 allows management activities and practices to go forward if they deviate from one or more lynx standards as long as a written, no-adverse affect determination is made, or if long-term benefits to lynx or its habitat would result. It remains unclear how a deviation from a protective standard would not be adverse, nor is it clear how short-term adverse effects and long-term benefits could be defined or quantified. Colorado can support projects, and if it gives a clearer definition and timing of the short-term effects and long-term benefits which would result from any proposed activity.	It is stated in the EIS that Standard All S2 would have adverse impacts to lynx. Alternative F was developed to address comments received, and is the preferred alternative for the FEIS.
246	8	30300	The Department recognizes the need for adaptive management strategies to conserve species and provide management flexibility where necessary and appropriate. However, projects with only short-term adverse effects and long-term benefits, as allowed by ALL S2, have not been clearly identified. The lengths of time identified as "short-term" and "long-term" are not defined in the DEIS glossary and are open to inconsistent interpretation. As such, ALL S2 again could potentially create unneeded confusion related to effects of land management actions on lynx, misinterpretation of standards, and misapplication of ALL S2, thus delaying project planning and consultation and resulting in avoidable adverse effects on lynx.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
64	74	31600	Because lynx are dependent on deep snow in spruce-fir habitats, both natural climate variability and long-term global warming may pose a potential risk to lynx conservation. Our concern is that the FWS Remand Notice says that global warming is "speculative", and as a result the DEIS does not mention global warming as a potential risk factor for lynx. Most U.S. and international scientists believe climate change poses real risks to our environment, although the exact nature and magnitude of the risks remain uncertain. Recent years during the regional drought have had	Global climate change has been addressed in the Final Biological Assessment.

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			unusually low and shorter duration snowpack, which may be affecting lynx and snowshoe hare survival and populations. Given the uncertainties, natural climatic variability and global warming/climate change should be identified and mentioned as potential risk factors, recognizing that their extent and magnitude are not easily measured.	
64	75	31600	We concur with the FWS Remand Notice, that the potential for long-term reduction in snow depth is uncertain. However, lacking any supporting science and recognizing existing science, further evaluation should consider how reduced snowpack in recent years has affected lynx and whether it may pose a threat to its viability in the foreseeable future.	The wildlife analysis considered snowpack effects for lynx. This is discussed in the analysis document. Climate change has been addressed in the Final BA.
145	5	32000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected national forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on precommercial thinning will contribute to long-term risks of insects, disease and fire.	
238	10	32000	We are very concerned about the restrictive nature of standard VEG S5, regarding precommercial thinning, this proposed standard fails to recognize the benefits of precommercial thinning for lynx habitat conditions through: a) reducing self-pruning and consequently maintaining limbs along more of the tree length for a longer period of time, thus increasing hiding cover and b) providing conditions that enhance the growth of shrubs that provide valuable forage.	Research is on-going on this subject, but to date the best available science discloses negative impacts to snowshoe hare densities after standard types of pre-commercial thinning.
238	11	32000	We are very concerned about the restrictive nature of standard VEG S5, regarding precommercial thinning. If implemented, this standard will result in stagnation and consequently loss of growth in lodgepole pine that will never be recovered; besides the loss of timber growth, this will contribute to the already overabundant mid-serial class landscape structure with limited future options.	
213	1	33000	Natural wildlife is more than just pretty creatures in our midst. More than sympathy toward our fellow earthlings. I need them: "I" need them and the moose, the wolf, the grizzly bear and all our brethren naturally existing in my world. What am I without them...just another selfish being... and I don't want to be a selfish being. Please help them, and I will do my very best to live with them. I have to have them, for people cannot be my only source of enrichment. Please understand this...I need them more than many	Comment noted.

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			people do; my life would be diminished if I were to think that only people exist in my homeland.	
2	10	33200	Regarding lynx protections and recovery, please consider the following: We have an obligation to future generations to restore lynx to their proper ecological role in the Southern Rockies.	The Forest Service has an obligation under many laws to provide for viability of native (and desired non-native) wildlife species. The National Forest Management (NFMA), National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA) all provide the mandate to conserve native wildlife species.
3	3	33200	For the successful repatriation of this charismatic cat to the ecoregion, the USFS must include language in its final plan that will secure real protection for the species and its habitat. The management plan should not include exceptions for logging, oil and gas drilling, or recreational impacts (snowmobiles are a particular concern).	The final plan will include protection for the species, while maintaining some flexibility for multiple use management.
5	6	33200	No tax money should be spent on this artificial issue [the management of the Canadian Lynx].	The National Forest Management Act (NFMA), National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA) all provide the mandate for the Forest Service to conserve native wildlife species. Comment noted.
6/1; 172/1; 176/1; 178/1; 198/2; 201/1; 206/1	1	33200	Unfortunately, the Forest Service's proposed lynx management plan ignores nearly every recommendation made in the Lynx Strategy and includes no real protection for lynx or lynx habitat. Without these protections, logging, oil and gas drilling and unfettered snowmobile use will continue to destroy lynx habitat, and individual lynx will face the risk of being accidentally killed.	The alternatives in the DEIS considered the LCAS. Alternative B was fashioned after the pertinent measures in the LCAS, Alternative C allows for a small amount of management flexibility, and Alternative D allows more flexibility for fuels treatments, energy development and precommercial thinning. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
8	9	33200	While there is a general discussion of characteristics of lynx habitat in the Southern Rocky Mountain Geographic Area (SRMGA), there is no discussion about the desired condition of that habitat. The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the Desired Future Condition.	The Vegetation standards and guidelines indirectly state the desired future condition for lynx habitat. For example, VEG S3 directs that at least 10% of the habitat should be in denning habitat (typically old growth structural stage) and well-distributed. VEG S1 directs that no more than 30% of the habitat should be in the very early seral stages (seedling/stand initiation stage).
11	1	33200	I am very opposed to any further introduction of the CANADIAN Lynx into the State of Colorado, not only are they not proven to be native to this area, there is not an ample food supply. I feel that mostly, people are concerned about is the money and to put this animal on the endangered	Comment noted.

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			list so lands can be closed to the public. This animal is from Canada, and that is where they should be left.	
14/3; 146/3	3	33200	The DEIS does not adequately identify which portions of the affected national forests will be affected by the proposed amendments. The headings for the proposed direction contain several variations of "Applies to lynx habitat in Lynx Analysis Units (LAUs), and in linkage areas subject to valid existing rights". However, the only details are a very broad-scale map and a description of Procedures for Lynx Habitat and Lynx Analysis Unit Mapping. Without detailed information about the location and extent of lynx habitat and linkage boundaries, the Forest Service is simply not in a position to accurately analyze and describe effects and potential impacts. The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are, or how they are identified.	The map in the DEIS was small and difficult to see the details. This map was improved for the SDEIS and FEIS. Larger scale maps were available electronically and were available for review at the public meetings. The final includes a small scale map; however, the analysis was based on reviews of appropriate scale maps and database information. Lynx habitat mapping was a biological inventory, which was done in an interagency process.
22/1, 23/1, 24/1, 25/1, 26/1, 27/1, 28/1, 29/1, 30/1, 31/1, 32/1, 33/1, 34/1, 35/1, 36/1, 93/1, 94/1	1	33200	I do not support the proposed Lynx management direction!	Comment noted.
64	87	33200	The seven exceptions and five additional situations under VEG S5 need to be better defined to indicate the acreage that may be involved. How, is "so as to not measurably reduce lynx forage habitat" defined?	Chapter 3, Wildlife resource environmental consequences of foraging habitat discussion noted 80,000 acres were likely to be treated for fuels, this is slightly more than one percent of lynx habitat, some of which would be precommercial thinning covered under the fuels exemptions in Alternative D.
64	49	33200	The Canada Lynx Biological Opinion (October 25, 2000), stated that research efforts should be initiated to better understand the potential for human activities to impact the lynx, including research into effects of precommercial thinning, snow compaction, highways and key linkage areas, forest road densities, human disturbances, and grazing. It is unclear if lynx research and studies have occurred to support conclusions in the DEIS.	No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. On-going research was considered for the FEIS. The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level. If it is found that lynx and coyotes are competing in a

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				particular area due to snow compacting activities then the guideline would be followed; and if not then the guideline need not be followed.
64	50	33200	The Remand Notice did not cite new research to support conclusions of low risk from various human activities. If the research has been conducted, please indicate in the Final EIS whether and how those research studies provide adequate information and data to draw conclusions that activities damaging to individual lynx and their habitat will not pose threats to lynx populations.	There is no "new" research to support conclusions of low risk from various human activities; research is on-going and not finalized. The Remand Notice stated only that there was a "lack of evidence" needed to state that there positively was a threat to the entire population of lynx.
64	53	33200	Many actions, if taken together for cumulative analysis instead of considering the effects of each individual action, appear to have the potential to reduce habitat both for the lynx and for its prey base, snowshoe hare. We realize that there are uncertainties in the magnitude of effects of activities and management direction on the lynx population as a whole, and that conclusive information on the risk factors in the LCAS and thresholds of effects is lacking. However, without adequate research and monitoring, it is difficult to understand how the various risk factors, as concluded in the DEIS, do not pose a threat to lynx populations when the long-term cumulative impacts of all risks are considered.	DEIS Chapter 3 pages 41-49 of Chapter 3 (under Summary of Effects to Lynx) summarized the cumulative effects to lynx, by alternative. Rationale for the "likelihood of lynx persistence in the SRMGA" were discussed by alternative.
64	56	33200	Please include specific details about the monitoring plan and the adaptive management plan in the Final EIS. Those details should note the monitoring and management protocols, thresholds, proposed responses to foreseeable and reasonably unforeseeable impacts, and budget and resource needs and availability.	
64	57	33200	It is unclear in the DEIS how research results, monitoring data, and other information may be used to inform management decisions. Monitoring typically is part of USFS land management decisions, and is critical for an adaptive management approach that can respond to changing environmental conditions, habitat alteration, unexpected lynx impacts, and other needs for lynx conservation and recovery. Lynx are difficult to monitor or census, and that monitoring requires costly equipment and methods. Effective monitoring will be critical to evaluate population responses and habitat conditions, particularly for Alternatives that deviate substantially from direction in the LCAS.	Colorado Division of Wildlife will continue to monitor the population of lynx, the USFS will continue to monitor the habitat for both lynx and snowshoe hare. Comment noted and monitoring section has been revised for the FEIS.
64	58	33200	A monitoring program should identify land management effects not only on the lynx but also on its food sources and its needed denning, foraging, and linkage habitats. We make this comment because of significant uncertainty about lynx population impacts from proposed management direction and	Comment noted and monitoring section has been revised for the FEIS.

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			about the cumulative impacts from the adverse impacts associated with proposed activities that are excepted or exempted from the Standards and Guidelines.	
64	47	33200	The [recommended additional disclosure of] cumulative impacts analysis should include an evaluation of the likelihood that proposed USFS direction is likely to conserve and restore the lynx.	The "Likelihood of Lynx Persistence in the SRMGA" analysis will be revised for the final preferred alternative in the FEIS.
64	35	33200	The VEG G7 and G8 Guidelines allow winter snowshoe hare habitat to be removed. That removal does not protect lynx and its habitat and hence does not contribute to lynx conservation and recovery. Please present the data and scientific rationale that supports this tradeoff of snowshoe hare habitat or requires mitigation to balance such losses, as can occur under such guidelines.	As guidelines, VEG G7 and G8 would be adhered to by the Forests in most cases. This allows the Forests flexibility in vegetation management where it can be justified in the site-specific analysis, without having to amend the Forest Plan.
64	59	33200	Monitoring results should be provided to biologists and managers, to assure that adjustments in management direction, if necessary, can conserve and restore the lynx.	Comment noted.
64	24	33200	If an action under ALL S2 has short-term adverse affects, it may be allowed if there are long-term benefits. In a small population, any short-term adverse affect could result in the loss of that population. Such a loss can make long-term benefits irrelevant if the species no longer exists in an affected area. Please explain how the long-term effects versus short-term effects are defined for Standards and Guidelines.	Comment noted. Alternative F was developed to respond to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2 standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
64	82	33200	There should be a separate section in the Final EIS to discuss the biology of the lynx as well as its food sources, especially snowshoe hare.	DEIS Chapter 3 page 6 referred the reader to "The Ecology and Conservation of Lynx in the United States (Ruggiero et al. 2000) for the latest science regarding biology of the lynx and snowshoe hare.
64	88	33200	The seven exceptions and five additional situations under VEG S5 need to be better defined to indicate the acreage that may be involved. Is the timing looked at to insure that there will be no disturbance to actively denning lynx?	Chapter 3, page 30 describes approximately 80,000 acres of lynx habitat potentially treated for fuels reduction in the next 10 years (1.3%).
64	23	33200	Given our evaluation of the ALL S2 Standard, we do not believe it should be part of an amendment to conserve and recover the lynx because the potential risks are likely to outweigh its benefits.	Comment noted. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. This alternative does not include the ALL S2

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				standard. In addition, Alternatives A, B and C did not include the ALL S2 standard.
68	1	33200	For the first time in 22 years, the issue of the Canada Lynx arose at the West Elk Mine and created delays to a methane drainage project that resulted in West Elk's work force being exposed to higher levels of methane that would have afforded by having the project approved and completed.	Comment noted.
71	1	33200	Your proposed lynx management plan includes no real protection for lynx or lynx habitat as required by the U.S. Fish and Wildlife Service and ignores nearly every recommendation made by the Lynx Strategy. Under your plan lynx habitat will continue to be destroyed by logging, oil and gas drilling and increased recreational snowmobile use.	Comment noted. The standards and guidelines provide management direction that was noted as lacking when the species was listed as threatened. The final plan will provide protection for the species, while maintaining some flexibility for multiple use management.
74	2	33200	Unfortunately, you have ignored nearly every recommendation made in the Lynx Strategy and includes no real protection for lynx or lynx habitat. Without these protections, logging, oil and gas drilling and unfettered snowmobile use will continue to destroy lynx habitat, and individual lynx will face the risk of being accidentally killed.	The alternatives in the DEIS considered the LCAS. Alternative B was fashioned after the pertinent measures in the LCAS, Alternative C allows for a small amount of management flexibility, and Alternative D would allow more flexibility for fuels treatments, energy development and precommercial thinning. Alternative F would also allow flexibility for fuels treatments, energy development and precommercial thinning.
77	12	33200	The term "habitat" must be given a standard definition, including population numbers, across all of the forests included in this study. See DEIS at 3-6, 3-9. As written, the DEIS does not sufficiently define this term, and must be revised. Continuity must be provided to avoid the appearance of arbitrariness or bias. At the very least, "habitat" must mean areas where the species actually exists or has been known to exist in the very recent past.	Lynx habitat is defined in the Glossary.
77	2	33200	The Roe Report flatly contradicts many of the summary conclusions and guesswork found in the DEIS, and must therefore be obtained, reviewed, and incorporated by the Forest Service prior to the issuance of the Final EIS and the record of decision. Specifically, the Roe Report states that human activities have a much lesser effect on lynx than the DEIS would indicate.	The "Roe Report" was reviewed for the analysis, even though it is not a research paper, nor peer-reviewed scientific literature. Both the "Roe Report" and the DEIS analysis acknowledge the lack of evidence regarding snow compaction and competition, either supporting or refuting the hypothesis.
77	9	33200	Chapter 2 of the DEIS concerns "Issues." The DEIS summary sets forth three "Significant Issues," of which the first is "Lynx Productivity, Mortality, and Movements." See DEIS at S-2-3. In general, this first section is filled by "mays" and "cans" rather than "does" and "wills." Specifically, items (b) and (c) under heading 1 are false concerns. As the Roe Report reveals, "there is no evidence in the literature to support the hypothesis that open	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of

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			(non-forested) areas greater than 100 m wide are a barrier to lynx movement."	maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Dispersal travel movements may be much different.
78	3	33200	Protecting lynx habitat and migration/dispersal corridors throughout the Southern Rockies will do much more than increase the viability of one re-introduced species - it will provide an umbrella for other interior forest dependent species and help ensure robust biodiversity and ecological sustainability throughout the region.	Comment noted.
78	7	33200	It is totally unacceptable for Region 2 to even consider adopting a lynx 'management' plan that "may not ensure sufficient habitat quantity, quality, distribution and other conditions to provide for lynx productivity" and "decreases the probability of lynx persistence" relative to the scientifically developed recommendations of the LCAS.	The final plan will provide protection for the species, while maintaining some flexibility for multiple use management. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
83	2	33200	Why should one animal, that is plentiful in Canada, be given more concern than the people and animals that live in the forests of Colorado already? To protect one species without addressing the possible harm to other wildlife and habitat is not acceptable. I take offense to the government in part and whole to try and convince the people of Colorado that the Canadian lynx is a threatened or even an endangered species. In Canada these cats are plentiful enough to be hunted and killed. The only reason the Canadian lynx is threatened in Colorado is because this isn't Canada and there obviously must be a lack of food by how many have died. If we want to help these lynx survive than leave them alone in Canada.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. However, the Southern Rockies is at the southern extreme of their range. A species being almost extirpated from the fringes of their range can indicate a problem for the species viability.
84	4	33200	PAW urges state and federal agencies to adopt science-based Canada Lynx monitoring protocols and adaptive management strategies to ensure future natural resource management decision are based on facts.	Comment noted.
86	2	33200	It is clear the USDA "pre-intends" to adopt alternative D. It appears this approach is based primarily on executive order 13212, which places a higher value on expediting energy related projects over the work of creating and preserving adequate lynx recovery habitat. However, a simple executive order should not take precedence over scientific reality. If the USDA intends to fully address all issues in the EIS, the major issue of adequate lynx habitat should be the primary concern and ultimate focus of	The USFS is a multiple use agency, and fully believes that energy development at some level can occur along with the conservation and recovery of lynx in the Southern Rockies. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred

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			the EIS.	alternative in the FEIS that would meet the purpose and need.
87	3	33200	Why is the Forest Service refusing to include national forests outside the Rocky Mountain Region that are ecologically contiguous with those in the Region within the geographic scope of the analysis and Forest Plan amendment? This seems and overnight, one that will hopefully be amended in the final. Considering the fact that lynx released in Colorado are known to have traveled, and may be residing, in northern New Mexico, and are thought to have a t least traveled into Utah, protection if the lynx outside the Rocky Mountain Region is required. As a consequence, land use activities authorized by existing forest plans may affect lynx and lynx habitat and those forests plans should be amended as part of this regional process to ensure that lynx and lynx habitat are adequately protected.	Region One of the USFS completed Forest Plan amendments for lynx in the Utah National Forests that are considered to have viable lynx habitat. Lynx were not documented historically in New Mexico and the state of New Mexico does not consider lynx a native species in their state. The FWS listing package did not include New Mexico as within lynx range.
91	3	33200	The Canada Lynx do not breed every year. They breed based on the food supply. They may breed once every two to three years. Decisions will need to be reviewed annually. If the lynx population does not increase as anticipated, I do not want the forest activities jeopardized because of the lynx.	The biology of the lynx is referenced in the Ecology and Conservation of Lynx in the United States (Ruggiero et al. 2000). Lynx can breed every year, but depending on food supply, kitten survival is variable.
92	3	33200	If lynx have not been able to thrive in this area before, they may not be able to survive now either. I do not want activities restricted in this area for a project that may not survive anyway.	The USFS has the responsibility of managing for potential lynx habitat and the associated potential lynx, regardless of the State of Colorado's lynx translocation project.
95/36; 127/36		33200	ALL S1. Since neither the FS nor the FWS has identified forest management activities as a threat to lynx movement, and the literature doesn't document any threats from forest management activities to lynx movement, this standard should be changed to read - new or expanded permanent developments and activities must maintain habitat connectivity.	Vegetation management adjacent to highways is a critical component of maintaining connectivity. Vegetation management includes prescribed fire, wildland use fire, as well as timber management. In combination, these vegetation management practices and activities, if not planned carefully, could lead to fragmentation of lynx habitat connectivity in some areas.
95/13; 127/13		33200	The DEIS does not adequately identify which portions of the affected national forests will be affected by the proposed amendments. The headings for the proposed direction contain several variations of "Applies to lynx habitat in Lynx Analysis Units (LAUs), and in linkage areas subject to valid existing rights". However, the only details are a very broad-scale map on page 4 and a description of Procedures for Lynx Habitat and Lynx Analysis Unit Mapping in Appendix F. Without detailed information about the location and extent of lynx habitat and linkage boundaries, the Forest Service is simply not in a position to accurately analyze and describe effects.	The map in the DEIS is small and difficult to see the details. This map will be improved for the FEIS. Larger scale maps were available electronically and were available for review at the public meetings. The final includes a small scale map; however, the analysis was based on reviews of appropriate scale maps. Lynx habitat mapping was a biological inventory, which was done in an interagency process.
95/60; 127/60		33200	LINK G1: This [guideline] is completely inappropriate and irrelevant and	Link G1 applies to linkage areas only, and means that NFS

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			overreaching, and should be deleted.	lands within a lynx linkage area should not be traded away in a land exchange, unless a compelling case can be made that the benefits outweigh the potential impacts. That is why it is a guideline, as opposed to a standard, because there may be cases where a land exchange is warranted.
95/54; 127/54		33200	VEG G1. We agree with the concept behind this Guideline, i.e., encourage management to increase the habitat conditions necessary for lynx. But the Forest Service has undermined the concept by making it a Guideline, which means the Forest Service may not take it seriously. Perhaps not surprisingly, while the DEIS recognizes the potential to increase vegetation management "for the purpose of establishing additional snowshoe hare habitat and future denning habitat" (p3-76), the DEIS also acknowledges an expectation of limited change to result from implementation of VEG G1, "since harvest would be subject to the rest of forest plan standards, guidelines and resource constraints.	Comment noted. All Guidelines in Forest Plans are generally implemented, unless a compelling case can be made in the analysis and decision documents why they are not being adhered to and how the objective will be met.
95/7; 127/7		33200	The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the Desired Future Condition.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed.
95/15; 127/15		33200	6.3 million acres of national forest land in the Southern Rocky Mountain Geographic Area (SRMGA) have been mapped as lynx habitat within LAUs, but there has never been a forest plan amendment or a Line Officer decision or public review and comment regarding designation of LAUs or mapping of lynx habitat. The Forests lynx maps were reviewed and "accepted" [emphasis added] by lynx biologists from the FWS and Forest Service. The Forest Service cannot so cavalierly hand off designation of lynx habitat and LAUs to lynx biologists without amending the forest plans or without providing an opportunity for public review and comment. This applies to both the areas to be managed for lynx recovery and conservation to comply with the ESA and the areas to be managed for lynx viability to comply with the NFMA.	Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.
95/20; 127/20		33200	There is no discussion in the DEIS about the current condition or distribution of lynx habitat or the desired condition or distribution of lynx habitat. Neither is there any discussion about the adequacy of current forest plan direction to provide adequate structural habitat diversity for lynx or to achieve historic or "natural" forest conditions for any of the affected national forests. These should have been an important part of proposing	Current condition of lynx habitat is referenced in the FEIS in Chapter 3, Wildlife section. Distribution of lynx habitat is shown in the map (Figure 1.), which although small in the hard copy, can be zoomed in electronically from the CD. The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are

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			the overall direction for lynx. While there is a general discussion of characteristics of lynx habitat in the Southern Rocky Mountain Geographic Area, there is no discussion about the desired condition of lynx habitat. Those Forests are currently dominated by mature and older forests. There needs to be a better discussion about whether this is desirable and how much early successional forest is needed.	referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed.
98	2	33200	The DEIS states that this program was developed based on the best science available. I believe that is not true for a couple of reasons: From the beginning this was a troubled effort, as many lynx starved. The availability of food (hares) should have been studied long before the reintroduction began. Despite this obvious failure, the FWS or DOW response was to increase the number of lynx released.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. The two efforts are unrelated; the USFS would be amending the Forest Plans for lynx habitat regardless of the state's efforts.
106	6	33200	The mapping of lynx habitat is undeniably an action concerning the proposed lynx amendment. The mapping of lynx habitat also has an adverse environmental impact. Already, lynx analysis units are guiding the implementation of various forest management actions, including timber sales and road construction projects that are adversely impacting lynx habitat. Thus, the mapping of lynx habitat is already having direct and indirect adverse environmental impacts and is therefore prohibited under CEQ NEPA regulations.	Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.
106	4	33200	The DEIS and proposed amendment entirely fail to address the adequacy of lynx habitat mapping in Region 2, despite the fact that numerous concerns have been raised over this issue. The USFS has already mapped lynx habitat throughout Region 2 and is apparently relying on this mapping as a basis for implementing the proposed amendment and assessing its effectiveness with regards to lynx conservation.	Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways.
106	10	33200	Lynx habitat mapping has formed the basis for analyzing and assessing the impacts of these activities to lynx and lynx habitat. Many of these actions have also adversely impacted lynx and lynx habitat, indicating the mapping of lynx habitat is leading to potentially significant adverse impacts in the interim.	Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.
106	9	33200	There is no question that the mapping of lynx habitat, in addition to implementation of the recommendations of the LCAS, is major federal action, which is covered by the proposed lynx amendment that may	

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			significantly affect the quality of the human environment.	
106	5	33200	The proposed amendment and DEIS make no indication that lynx habitat mapping will change or be addressed through the current NEPA process, indicating that the mapping of lynx habitat and its concordant and ongoing impacts upon national forest management have already been decided and are being implemented.	
106	20	33200	We do have many concerns over the adequacy of lynx habitat mapping throughout Region 2. We are also concerned that lynx habitat was not mapped using the best available science. On the Medicine Bow National Forest, for example, suitable denning and foraging habitat was mapped directly adjacent to busy highways, such as State Highway 70 over the Sierra Madre and the State Highway 130 over the snowy Range. In the final rule to list the lynx as a threatened species, the U.S. Fish and Wildlife Service specifically identified highways as threats to lynx.	
106	21	33200	We do have many concerns over the adequacy of lynx habitat mapping throughout Region 2. Suitable habitat was mapped in areas that have experienced intensive industrial logging, including extensive strip-cutting and clear cutting. Although these areas may provide some valuable habitat components, the best available scientific information indicates lynx typically prefer less disturbed areas for denning.	
106	15	33200	The mapping of lynx habitat is connected with the proposed lynx amendment because the amendment cannot be implemented without the mapping of lynx habitat and because lynx habitat mapping is an interdependent part of the lynx amendment and depends upon implementation of the lynx amendment for justification. The failure to address the adequacy of lynx habitat mapping also strongly indicates the USFS has not considered a range of reasonable alternatives for the proposed lynx amendment.	Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.
106	11	33200	The mapping of lynx habitat forms the foundation of the proposed lynx amendment. Implementation of the proposed amendment is contingent primarily upon the existence of mapped lynx analysis unit and thus it is clearly not independent of the proposed amendment.	
226	4	33200	It appears that delineation of LAUs is arbitrary. Larger landscape considerations should be given managing for lynx. This would allow for a more balanced landscape and would provide habitat where the most potential exists.	
106	13	33200	The mapping of lynx habitat will prejudice of the ultimate decision for the	

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			proposed lynx amendment because it will determine subsequent development and has limited alternatives. Indeed, implementation of the proposed lynx amendment is contingent upon lynx habitat mapping, thus by mapping lynx habitat before issuing the proposed amendment, the USFS has predetermined where and to what extent adverse environmental impacts will occur.	<p>a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.</p> <p>Ponderosa pine habitats are not considered suitable lynx habitat, as the snowshoe hare, which is the lynx's primary prey, doesn't use ponderosa pine habitats. The National Lynx biology team, and the Lynx and Wolverine steering committee excluded the Black Hills as lynx habitat, based on the best science available. See project file for mapping direction from Lynx and Wolverine Steering committee.</p>
106	12	33200	We have not seen any EIS come from any National Forest in Region 2 that explicitly deals with mapping lynx habitat. Thus, the mapping of lynx habitat is not covered by another EIS.	
106	14	33200	The mapping of lynx habitat has already limited the analysis of a range of reasonable alternatives. Mapped lynx habitat is the same under all action alternatives analyzed for the proposed lynx amendment, strongly indicating the mapping of lynx habitat has precluded the analysis and selection of reasonable alternatives.	
106	19	33200	We do have many concerns over the adequacy of lynx habitat mapping throughout Region 2. Individual forests did not seem to employ consistent methods of identifying and delineating lynx habitat. Of additional concern is that it seems no on-the-ground surveys have been done to verify the existence and quality of mapped lynx habitat.	
106	54	33200	Overall, historical reports of lynx inhabiting the Black Hills seem accurate and valid. These reports indicate that the lynx historically inhabited the Black Hills as a permanent resident (Grinnel 1875, Dodge 1876, Turner 1974), but the extensive habitat modification and unchecked hunting pressure has most likely caused the decline and possible extirpation of the species (Graves 1899, Shinneman 1996, USFS 1996), similar to what has occurred in other portions of the species contiguous United States range (USFWS 2000). The Black Hills should therefore be considered as within the contiguous United States range of lynx.	
106	52	33200	We are troubled that the proposed lynx amendment excludes the Black Hills National Forest of South Dakota and Wyoming. The Black Hills have strong floristic ties to the Northern Coniferous Forest biome and several species of animals typical of boreal forests exist in the Black Hills.	
106	53	33200	We are troubled that the proposed lynx amendment excludes the Black Hills National Forest of South Dakota and Wyoming. The reports of Grinnel (1875) and Dodge (1876) strongly indicate the lynx historically inhabited the Black Hills as a permanent resident – not as dispersing individuals.	
106	57	33200	Historical reports of lynx and the present-day and historical occurrence of	

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			lynx habitat in the Black Hills strongly indicates the Black Hills are within the contiguous United States range of lynx. Thus, the USFS should include the Black Hills National Forest in the proposed lynx amendment to ensure adequate habitat protection and lynx recovery in the forest.	
106	23	33200	The abundance of coarse woody debris is far outside the range of natural variability for the Medicine Bow as a result of extensive clear cutting (Tinker and Knight 2000, 2001). It is unclear how this scientific information was used to map currently suitable lynx habitat on the Medicine Bow and to ensure adequate protection of lynx habitat.	The Medicine Bow NF mapped what would be considered suitable habitat for lynx in today's condition. Even though some conditions have changed from historically, the dry lodgepole type of habitat found in southern Wyoming, probably never did provide winter lynx habitat, as it is not successional to spruce-fir, which is the prime denning habitat. See project file for the Forest's Rationale and criteria for lynx habitat mapping.
106	22	33200	Lynx habitat seems to have been delineated with the caveat that enough suitable habitat currently exists to ensure the long-term survival of the lynx. On the Medicine Bow National Forest, this assumption is highly suspect. Studies have demonstrated for instance, that the Medicine Bow National Forest is extremely fragmented as a result of extensive clear cutting and road building, that the amount of older (e.g., mature to old growth), continuous forest has been drastically reduced, and that the forested ecosystem of the Medicine Bow is generally far outside its range of natural variability with regards to these impacts.	
106	49	33200	Consider region-wide adoption of the lynx as an MIS. Such a designation would ensure that threatened and endangered species are appropriately represented in MIS lists and would give the USFS a valuable tool in estimating the effects of forest management to lynx and other species dependent upon similar habitats. If the USFS does not believe the lynx warrants designation as an MIS, we request the agency fully explain how other MIS adequately represent the habitat and biological needs of the lynx.	Many forests have either lynx or snowshoe hare as a Management Indicator species. It is much more cost efficient to monitor snowshoe hare, which is the primary prey of lynx, through pellet counts, than it is to monitor individual lynx.
109	7	33200	The DEIS will cause unreasonable and costly federal constraints to be placed, under the guise of the Endangered Species Act, upon most of the State of Colorado. DEIS Page S-4 states (caps as in document), " ALL MANAGEMENT ACTIVITIES AND PRACTICES (ALL) - Applies to lynx habitat in Lynx Analysis Units (LAU's), and in linkage areas subject to valid existing rights."	The direction in the alternatives that relate to "ALL MANAGEMENT ACTIVITIES AND PRACTICES" relate only to Standard ALL S1 which provides for habitat connectivity; Guideline ALL G1, which suggests using techniques to avoid or reduce effects to lynx when constructing highways; and LAU S1, which says LAU boundaries will not be changed unless based on new information and reviewed by US Fish and Wildlife Service (while the species is still listed).
109	9	33200	Exactly to what land does this DEIS apply? A. Lynx habitat is defined as anything above 4,000 feet and some below 4,000 feet. Appendix F, page 1, paragraph 2("Areas below 4,000 ft, usually should be excluded.") B. Non-lynx habitat is "areas such as lakes and openings that do not support	Glossary Page 9 states that lynx habitat in the Southern Rockies is from 8,000 feet to 11,500 feet elevation. The linkage areas are specifically mapped and shown on the map on page 4, described in Appendix D.

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			snowshoe hare populations and are not considered to be capable of providing lynx habitat." Glossary p11. C. Lynx Linkage Areas are the basins, valleys and agricultural lands. (DEIS Glossary page 9). This is the whole state of Colorado except for the surface of lakes when they are not frozen and the very southeast corner which is below 4,000 feet.	
121	3	33200	The EIS says that this action is needed to conserve the lynx. This is an ironic statement considering lynx populations are growing remarkably through the natural propagation without the USFS-managed direction. This begs the question of why the USFS is recommending an arbitrary and capricious plan that focuses on a sole species that seems to managed very well within the present direction of the USFS?	We are not aware of lynx populations growing remarkably in the United States through natural propagation in the recent past. The Forest Service, as well as the Bureau of Land Management, have been managing lands since April, 2000 under a Lynx Conservation Agreement, which obligates the agencies to consider the conservation measures in the Lynx Conservation Assessment and Strategy in our land management decisions.
121	6	33200	Current lynx population development is of sounder science and data than proposed in this EIS. CCA strongly recommends that the USFS use this quantifiable direction in their management strategies for this species and for consideration in future EIS publications.	Comment noted. The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need. The FS consulted with the FWS with the development of Alternative F, in response to comments received on the draft analysis.
121	2	33200	CCA's primary concerns with the draft EIS rest in the overreaching scope that is being prescribed in the name of a sole species; the lynx. USFS is tasked with managing their lands in a multi-use methodology. The draft EIS usurps this method by dictating management strategies for vegetative resources, wildlife, other endangered species, grazing, recreation, etc. for unfounded needs of preserving the lynx. The EIS goes into great detail of what "might impact" the lynx or lynx habitat, but bases very few of these "mights" on scientific or historically relevant proof or data. It is the responsibility of USFS to publish an EIS that provides adequate documentation, data and proof to support any recommendation made. The recommendation made throughout the EIS will pose a diametric shift in forest management and will most assuredly change the ecological demographic for many resources the USFS is mandated to manage beyond the lynx.	The DEIS bases the purpose and need for the addition of conservation measures for lynx on the science discussed in "The Ecology and Conservation of Lynx in the United States" (Ruggiero et al. 2000) which summarizes the latest pertinent science regarding lynx and snowshoe hare (the primary prey of lynx) into one scientific publication. The conservation measures proposed in all alternatives are not expected to pose a diametric shift in forest management.
126	49	33200	We have a hard time commenting on the specifics of this proposal without a better idea about where it will be implemented and where it will not be implemented. From the maps we have been able to find, we understand that there is discrepancy among the forests about whether or not all lands are included, and that some lands may be excluded based upon arbitrary	The lynx habitat mapping process was not based on arbitrary criteria. The mapping process explanation, and each forest's rationale and criteria can be found in Appendix F and the project file. The USFWS was an integral part of the mapping effort, and we are not in violation of the ESA.

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			criteria. We urge the Forest Service to implement the proposed amendment in all areas that could provide suitable lynx habitat. Failure to do so is in violation of the ESA, since it may allow activities that harm lynx using these areas.	
126	78	33200	Because of the interdependence between the lynx populations in the U.S. lower-48 states and southern Canada, U.S. land and wildlife officials should: (1) approach Canadian officials toward maintaining contiguous lynx populations, (2) direct even more precautionary management of U.S. habitat given the threat to this connectivity.	Comment noted.
126	50	33200	Lynx protections should be implemented consistently across all areas of suitable habitat on federal lands across the northern Rockies. Excluding BLM lands Montana, Wyoming, excluding Forest Service lands that are under plan revisions, and excluding Forest Service lands in Oregon and Washington does not give us assurance that this will happen.	Each Forest has different circumstances and timeframes for Plan revisions. All are currently operating under the Lynx Conservation Agreement, which provides for consistency in management for the Forest Service.
126	86	33200	A Process of cumulative effects analysis is needed to assess the combined magnitude of these threats and implications for future management. Cumulative effects analysis can also provide a means to monitor the habitat quality of an area: that is, its ability to provide the security and various other components for denning, foraging, travel, and other lynx needs.	Comment noted. The reason behind delineating "Lynx Analysis Units (LAU)"S was precisely for this reason, so current and cumulative changes could be tracked more easily.
126	53	33200	The LCAS directs that the FS and BLM: "Develop and implement a plan to protect key linkage areas on federal lands that would create barriers to movement" (p. 89)." The proposed amendment directs these agencies to identify key linkage areas, but only proposes protection from new developments or special use permits, lands exchanges, etc. This is not adequate to fulfill what was described in the LCAS and this very important, because lack of coordinated forest planning to address the fragmentation of lynx habitat is among the primary reasons why the lynx was listing for ESA protections.	The Forest Plan amendments provide the sideboards for the general protection and management of linkage areas. Each linkage area will have site-specific needs and opportunities, which should be developed at the local level.
126	54	33200	A Forest Service spokesman claimed that this LCAS standard is outside the scope of this amendment, and may be addressed in a separate process, but we have no assurance that this will occur any time soon. It is only appropriate that this amendment directs that each national forest and BLM unit actively participate in the timely implementation of at regional strategy to maintain landscape connectivity among lynx populations in the northern Rockies.	
126	32	33200	In its remand decision, the FWS introduced the notion that threats that are not known to harm entire lynx populations are not significant, even if they	Comment noted.

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			harm individual lynx. The following excerpt is an example of this: "The risks identified in the LCAS are based on effects to either individual lynx, populations, both, or lynx habitat. Therefore, not all of the risks identified in the LCAS threaten lynx populations in the United States. For example, one risk factor identified for the Southern Rockies Region is accidental death from vehicle collisions. While this may result in the death of individual lynx, it is not considered to be a threat to lynx populations." (USDI 2003, p. 40096). Whether or not we agree with this distinction by the FWS, it is clear that the FWS meant it to apply to the question, "Is the threat known to be significant enough to warrant upgrading the protected status of an entire lynx population from threatened to endangered?" The Forest Service has no basis to take the FWS finding that many potential threats to lynx do not meet this threshold, and wrongly use it to discount these same threats as important to restoring lynx within the Northern Rockies region.	
126	16	33200	The Forest Service fails to set forth the reasons why it selected Alternative E as its "preferred alternative." Yet it does list five "primary issues" that it claims "reflect conflicts between lynx conservation and alternative uses of natural resources" (DEIS, p. 18). It is not clear from the Forest Service's own analysis that Alternative E is a better choice than the Proposed Action as far as these issues are concerned.	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
134	1	33200	[NHES] strongly demand[s] the U.S. Forest Service adhere to the recommendations of its own biologists and provide strong protection for the lynx populations of the northern Rocky Mountains.	Comment noted.
135	1	33200	I read with interest the other day an article in the Silverton Standard Paper on the second re-introduction of the Canadian Lynx into the San Juan Mountains. A lover of wild life and amateur outdoor photographer myself, I have no problem with the program itself except for the way it is being handled, which leaves a lot to be desired.	Comment noted. The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort.
137	10	33200	We are disappointed to see such weak and vague standards; for example the 10% denning standard is really a minimum. By managing for minimums, the [FS] continues to not adequately meet the needs of Threatened Wildlife Species and this will not ensure that lynx will recover and be protected from further declines.	The amendment standards and guidelines are based on the best available science, which includes the recommendations in the Lynx Conservation Assessment and Strategy. However, in the Southern Rockies the estimated amount of denning habitat is currently 30-50% in most LAU's, due to large amounts of mature forests on the landscape.
140	2	33200	There is no evidence that the earlier introduction of lynx in the Creede	There is good evidence that lynx occurred in the Southern

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			area has met with any success. This just isn't "their type of environment", and trying to make it so is not scientifically supported. Said simply there is no reason to believe that a "force play" to establish a lynx population will even work.	Rockies in the 19th and 20th century, sometimes in abundance. The Southern Rockies is at the southern fringes of their range, however. Lynx have been historically documented as far south as Conejos County, in the very southern part of Colorado. The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
140	3	33200	This business of "threatened" or "potentially endangered" has no basis in fact as far as the lynx is concerned. They flourish in Canada and the Northern United States.	The lynx was federally listed as "Threatened" by the U.S. Fish and Wildlife Service on April 24, 2000, after 10 years of reviewing information relating to the status of lynx in the United States.
141	2	33200	I would like to offer some thoughts: The lynx is not "threatened" or "potentially endangered". They flourish in Canada and the Northern United States.	
142	2	33200	There seems to be a very serious question as to the history of the Lynx in Colorado. The Lynx should not be used to move forward the extreme environmentalist agenda of management for a few of our public land.	There is no question that lynx are native to Colorado. The Forest Plan amendments are to ensure that management practices do not impair the ability to conserve the species.
145	6	33200	The DEIS fails to identify desired vegetation structures, desired landscape diversity and structural stages, potential prey habitat, and core areas of breeding habitat which may be the basis for population viability, if viable populations are even possible in the SRMGA. There didn't appear to be any discussion about the adequacy of current forest plan direction to provide adequate structural habitat diversity for lynx or to achieve historic or "natural" forest conditions for any of the affected national forests. While there is a general discussion of characteristics of lynx habitat in the [SRMGA], there is no discussion about the desired condition of that habitat. The proposed amendments do not contain a desired future condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the desired future condition.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed. The Vegetation standards and guidelines indirectly state the desired future condition for lynx habitat. For example, VEG S3 directs that at least 10% of the habitat should be in denning habitat (typically old growth structural stage) and well-distributed. VEG S1 directs that no more than 30% of the habitat should be in the very early seral stages (seedling/stand initiation stage).
149	17	33200	ALL S2. This exception effectively negates the entire suite of standards included in the amendment, since use of this exception is unlimited. DEIS at Ch. 3 p. 25. As with the exceptions included in ALL S1, the FS concedes that this standard produces a) "a greater amount of uncertainty as to the effects to lynx," and b) the potential for "adverse effects to both denning and the associated foraging habitat, and this could ultimately affect lynx populations." Id. The DEIS concedes further that "this exemption may not ensure that management requirements are implemented that would provide for lynx persistence and recovery in the	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need. The direction in the alternatives that relate to "ALL MANAGEMENT ACTIVITIES AND PRACTICES" relate only to Standard ALL S1 which provides for habitat connectivity; Guideline ALL G1, which suggests using techniques to avoid

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			SRMGA." DEIS at Ch. 3 p. 45. Finally, the FS admits that the application of this exception would make accurate analysis of cumulative impacts to lynx across the geographic are virtually impossible. DEIS at Ch. 3, p. 37.	
149	16	33200	ALL S2. In contrast to ALL S1, which at least pretends to provide important lynx and lynx habitat protections, ALL S2 ensures that any such protections provided by the lynx amendment can be readily suspended: "A project proposal that deviates from one or more lynx standards may proceed without amending the Plan, subject to ESA requirements..." if either of two conditions are met. DEIS at S-5. Under this standard, the FS can suspend any other provision in the amendment simply by making a "written determination...that the project is not likely to adversely affect lynx" or by concluding that the project "may result in short-term adverse effects to lynx" but where "long-term benefits to lynx and its habitat would result." Id. The DEIS provides no explanation of or parameters for these written determinations (e.g., scientific standards to which they must be held, spatial scale at which the analysis must be conducted, whether any sort of analysis is required at all, etc. The DEIS provides no explanation of or parameters for these conclusions, such as the scientific standards to which they must be held, spatial scale at which the analysis must be conducted, whether any sort of analysis is required at all, etc. Indeed, the proposed language suggests that a project with severe short-term adverse effects might be permissible even if it produced only minimal long-term effect, since the provision does not even require a balancing of effects.	or reduce effects to lynx when constructing highways; and LAU S1, which says LAU boundaries will not be changed unless based on new information and reviewed by US Fish and Wildlife Service (while the species is still listed). Alternatives A, B, C and F do not include the ALL S2 standard.
149	48	33200	The Forest Service continues to insist that it need not adopt a formalized process for amending it current lynx habitat maps and Lynx Analysis Units and notifying the public of such amendments. See, for example, April 10, 2003 letter of Rick Cables to Jacob Smith ("the Regional Office is unable to notify you and provide you with maps every time they are modified.") Case law and common sense both support our view that such a process is essential, especially given the extent to which the protections in this forest plan amendment are tied to these two sets of maps, that the Forest Service not be permitted to change the boundaries at will and without notification. Such a scenario would virtually guarantee that the habitat, linkage, snow compaction, and Lynx Analysis Unit maps would be redrawn to accommodate projects and other proposed land uses that would otherwise be inconsistent with the protective provisions of the amendment.	LAU S1 states that LAU boundaries would not be adjusted except through agreement with US Fish and Wildlife Service. Modeled seasonal lynx habitat within LAU's will be an iterative process with field validation efforts, and tracking of successional stage changes, also through agreement with USFWS (while the species remains federally listed and Section 7 consultation is occurring). The habitat changes will be updated annually. The baseline snow compaction maps are based on information from the years 1998-2000, and should not change. Linkage areas should not change regularly, but with updated research and data from the Colorado Division of Wildlife on radio-collared animals, linkage areas may be refined at some point. The public is allowed to request the habitat information as needed.
149	47	33200	These amendments are clearly and explicitly tied to the Forest Service's lynx habitat and linkage mapping: "This amendment applies only to National Forest System (NFS) lands identified as lynx habitat or linkage	

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			areas." DEIS at S-2. The direct tiering of many of the amendment's provisions to both these maps and to the Lynx Analysis Units deepens the relationship between these boundaries and this amendment. This necessitates that these maps and boundaries remain stable. While we do not object to refining maps as more data and better information become available, such refinements must be connected through a transparent and credible process that includes, among other things, reliable public notification of any such changes.	
149	58	33200	Of particular concern is the DEIS' treatment of ecosystem disturbance processes. The DEIS' guiding principle seems to be that the FS' obligation is to minimize the extent to which such disturbances occur and, where they do, to maximize the extent to which the FS can provide for the recovery of snags and downed wood. DEIS' management provisions regarding fuels reduction and other logging is to provide for the maximum possible while still incorporating the pretense of lynx conservation. That the FS so unceremoniously dropped the recommendations of the LCAS for protecting mature forests and other key denning habitat components dramatically exacerbates this concern: the preferred alternative provides very little protection for these key habitat components (and that little protection can be readily suspended, as we have shown elsewhere in this letter).	Several objectives address ecosystem processes. VEG S6 in Alternatives B and C and VEG G6 in Alternative D provide protection of the snowshoe hare habitat within mature forests. VEG S3 protects denning habitat, which currently is not considered to be a limiting factor in the Southern Rockies. VEG S6 was added to Alternative F to add protection for mature multistory forest habitat.
149	49	33200	The current lynx habitat maps are replete with significant problems that hamper their utility. See, e.g., January 17, 2003 letter of Center for Native Ecosystems et al. to Greg Warren et al., attached as Exhibit 3. For example, the mapping and analysis protocols sometimes vary from forest to forest (often even across adjacent forests), and the maps are severely limited by data deficiencies (e.g., the Forest Service does not have much data for some of the most important habitat components, such as down woody debris). While the Forest Service has taken some steps to remedy these problems, many persist and must be corrected.	Modeled lynx habitat is the first step in any species habitat mapping, and was meant to be an iterative process with both field validation and natural disturbances or management activities that change the successional stages of the forested stands. The habitat mapping will be updated on an annual basis for the purposes of Section 7 consultation with the USFWS and monitoring. The public may request these maps as needed.
149	50	33200	The Forest Service must begin to rely on a transparent and credible process for any additional mapping that occurs and any refinements or revisions to existing maps. The FS must also make available to the public the complete current maps of habitat, linkages, and LAUs, and must promptly notify the public, especially parties, like the undersigned groups, that are expressing a specific interest in this issue, every time any of the maps are modified. In the absence of these steps, every project approved under these lynx amendments and Forest Plans incorporating these amendments is biologically suspect and legally inadequate.	

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149	56	33200	The DEIS failed to consider the potential for habitat restoration, another critical omission. Although some of the measures under consideration (and recommended by the LCAS) might contribute to improved habitat conditions or even more habitat outright, this is more than offset by the amount of continued habitat degradation and loss permitted by the proposed plan.	Many of the objectives, standards and guidelines encourage habitat condition improvements, such as: ALL 01, All S1, ALL G1, VEG 02, VEG 03, VEG 04, VEG G1, VEG G2.
149	55	33200	The Forest Service has no ability to make a reasoned determination of lynx viability, a point that even the DEIS acknowledges. The Forest Service, in response to this obvious and fatal analysis failure, offers only that: "Use of this standard will be monitored." This is wholly insufficient by any applicable legal or biological standard. The Forest Service can only assess the impacts of ongoing land uses authorized under existing Forest Plans if it knows what those impacts will be and how they will be affected by this amendment's standards. Because it concedes that it is unable to predict how frequently the standards of the preferred alternative will be employed, it simply cannot intelligently or reasonably or credibly reach a conclusion about impacts or, subsequently, about continued lynx persistence and viability across the region or on individual National Forests. Even if ALL S2 were removed, the FS will still fail both in its ability to make a reasoned viability determination and in, substantively, actually assuring viability.	Comment noted. Alternative F was developed for the FEIS based on comments from the DEIS, and All S2 was not included in Alternative F.
150	20	33200	Have any of the reintroduced lynx set up "home ranges" in any of the LAUs depicted as "unsuitable" in the DEIS? [Clarify] DEIS at Table 3-WL-2.	There are no LAU's depicted as "unsuitable" in the DEIS. Some acreage within most LAU's are classified as "lynx habitat currently in unsuitable condition" which means either a fire or a timber harvest has changed a forested stand to a grass-forb stage, and it will be suitable lynx habitat again at some point in time, with ecological succession.
150	13	33200	CSCUSA urges the Forest Service to incorporate more of the CDOW reintroduction data and substantively use it as required by the Endangered Species Act. (federal agencies must use the "best scientific and commercial data available" to determine whether their actions will cause adverse effects to listed species.	Comment noted. The Forest Service has cooperated with the CDOW, as the Department of Natural Resources is a "Cooperating Agency" officially on the lynx amendment process. They provided the Forest Service with the most recent data available.
150	1	33200	CSCUSA supports the Forest Service's efforts to conserve and recover lynx in the Southern Rockies. CSCUSA urges the Forest Service to base its lynx conservation efforts on the best available scientific and commercial information. That information demonstrates that lynx conservation and managed recreation can co-exist and mutually thrive.	Comment noted.
150	3	33200	The DEIS concludes that the flexibility of All Standard 2 of Alternative D	The DEIS conclusion regarding lynx persistence, especially in

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			imperils lynx and provides a low probability of lynx persistence. See DEIS at 3-47. That conclusion is arbitrary, irrational, contrary to the record, and invites unnecessary controversy and even lawsuits. It is troubling that the Forest Service concludes that a standard which permits flexibility only where the agency first concludes that lynx will not be adversely effected will cause adverse effects to lynx.	regards to standard ALL S2, was based on worst case scenario and possible cumulative impacts, given that there was no information or estimates available as to how much or how often that standard would be used in the field.
157	1	33200	I do not support the proposed Lynx management direction!	Comment noted.
159	3	33200	The lynx management plan should not include exceptions for logging or other harmful activities that affect the habitat.	The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans.
224	3	33200	Applying a lynx strategy to all possible lynx habitats is making that goal superior to all others. Public input would show other social preferences to biologists plans.	
226	5	33200	The current absence of a more reliable scientific basis for lynx management, forest management emphasis in Wyoming should be placed on balancing flexibility for known productive multiple uses against the likelihood of significant benefits for lynx.	
167	2	33200	Recently, I watched a TV program about the legal bow and arrow hunting of Canada Lynx in Canada. The Canada Lynx, continent wide, is not endangered. The Lynx is not well suited for the longer periods of snow-free ground in the San Juan Mountains. I am an environmental steward. To others the 'Lynx' is an excuse to stop human development - be that: backpacking, sheep grazing, road building, logging, home construction, skiing, or recreation. The choice of drilling in the San Juans (at a risk less than a legal arrow in Canada to the lynx) or having my son shipped home in polyethylene is simple.	
174	1	33200	As a concerned citizen I urge you to strongly protect the Canada Lynx in all phases. This elusive cat already has a very difficult task as it is so habitual, the land it lives on and the food it eats is crucial to its survival. Please don't let us kill off another of our precious creatures!	
180	1	33200	It is incumbent on the USFS to provide protection to this rare animal. By protection I mean lynx and lynx habitat. I am aware of the [LCAS]. The proposed alternative does not afford the protection required to insure the continued survival of the species. Logging, oil and gas drilling and motorized recreation must be eliminated from lynx habitat.	Comment noted. The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans.
187	1	33200	I wanted to express my concern that the plan leans too heavily to development and exploitation of the lynx supporting habitat. While I understand that the country has many resource needs, I believe that it is	Comment noted.

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			important to protect not only keystone species like the lynx but the habitat they require. Long term, the US needs to curb its appetite for natural resources and a step in that direction is to ensure that the lynx habitat is protected.	
190	1	33200	As a resident of the San Juan Mountains of southern Colorado, I strongly support the protection and preservation of the Canadian Lynx and it's habitat.	Comment noted.
191	5	33200	Management provisions to protect the lynx should be given weight as standards, not just "discretionary guidelines" which we all know can be ignored.	Comment noted. All Guidelines in Forest Plans are generally implemented, unless a compelling case can be made in the analysis and decision documents why they are not being followed/implemented.
199	1	33200	I strongly feel the current lynx habitat in the Colorado San Juan mountains must be maintained to benefit the lynx. It should not be opened up for multiple uses like logging, grazing, ski resorts, snowmobiling, utility corridors, mineral extraction, etc. An additional 37 lynx are scheduled to be released in the San Juan mountains by the end of April 2004. Now is not the time to open this area to conflicting uses that will harm the lynx. So far the lynx reintroduction has been a success. The USDA Forest Service should not allow any activity in lynx habitat that might jeopardize the continued success of the reintroduction. Lynx once inhabited much of Colorado's high country, but human activity and habitat changes led to the extirpation of the species around the state in the late 19th and early 20th centuries. The last confirmed lynx was illegally trapped near Vail, Colorado in 1972. The lynx must be allowed to return and flourish once again in Colorado.	Multiple uses such as logging, grazing ski resorts, snowmobiling, utility corridors, mineral extraction, etc. as not new uses of the San Juan National Forest, they have been occurring over the last century, therefore this amendment is not "opening up" the forest for multiple uses. The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans.
204	2	33200	Standards Section; ALL S1 - Change 'Must Maintain' to 'attempt to achieve through reasonable actions' ALL S2 - Should be amended to apply to existing documented Lynx habitat, not habitat that may become or might be suitable lynx habitat.	As habitat connectivity for lynx has already been impacted, habitat connectivity is a necessity to provide for viability of the species in the Southern Rockies. Lynx is a native species to the Southern Rockies, and as such, all suitable habitat must be managed as "lynx habitat".
211	11	33200	The information currently being used by USFS biologists to make effects determination for lynx is the best scientific and commercial information available. We have no reason to believe that better information exists regarding lynx biology than that which is currently available. Thus, use of this exception for decision-making might be considered to be arbitrary.	Comment noted.
214	1	33200	I think we should leave the lynx where they are now.	Comment noted.
226	2	33200	The restriction of precommercial thinning has been misapplied for	Much of the state of Wyoming's lodgepole pine habitats are

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			Wyoming Forests. Wyoming Game and Fish comments suggest that the best efforts to enhance lynx would be by focusing on early and late succession forest habitats. Prescriptions that focus on precommercial thinning that enhance habitat needed by hares should not be limited and in fact should be promoted.	outside of Lynx Analysis Units, and therefore have no restrictions at all on precommercial thinning.
228	2	33200	I feel strongly about the lynx issue. There is debate about the existence of lynx in this area. In fact according to the [USFWS] website, the Primary Area of Occurrence (Primary Habitat) does not show lynx as far south in Colorado.	Currently, lynx do exist in southern Colorado, and evidence exists that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. However, the Southern Rockies is at the southern extreme of their range. A species being almost extirpated from the fringes of their range can indicate a problem for the species viability.
231	9	33200	The amendment must necessarily consider management at a large scale, given the amendment area, the size of individual lynx home ranges, and the area needed for a viable lynx population. This LAUs do not contain equal amounts of actual or potential habitat. While on-the-ground management actions can be planned more efficiently on an LAU basis, we encourage a larger landscape consideration for the primary measurement of lynx habitat components.	The Lynx Analysis Unit's are primarily for tracking on-going changes to lynx habitat, on a scale of approximately a home range of a female lynx.
231	1	33200	It will be difficult for existing science to justify a significant management response specifically for the benefit of the lynx in the face of other competing land uses.	We do not consider the changes proposed in this amendment to be a significant change.
231	11	33200	In Wyoming, it may be most appropriate to implement forest management for lynx in the Wyoming Range on the Bridger-Teton National Forest, which is outside of the Southern Rockies area. Summarizations of state historical data show that lynx were most common there. Studies by our Department during the 1990's documented a remnant population, again mostly in the Wyoming Range. The lynx population in the Southern Rockies area in Wyoming is currently almost nonexistent, and likely holds little potential for habitat-based lynx benefits.	The interagency (federal and state) National Lynx and Wolverine Steering committee, based upon the best available science, included the Medicine Bow National Forest within the Southern Rocky Mountain Geographic Area for lynx range.
231	8	33200	The amendment must necessarily consider management at a large scale, given the amendment area, the size of individual lynx home ranges, and the area needed for a viable lynx population. The conservation value of objectives, standards, and guidelines in the alternatives is dependant on that scale.	Comment noted. The large scale noted in comment is precisely why there was a need on the landscape scale to provide for maintenance of connectivity. The Lynx Analysis Unit's are primarily for tracking on-going changes to lynx habitat, on a scale of approximately a home range of a female lynx.
235	10	33200	As planning tool, the Lynx Analysis Unit (Appendix C, p.8) is appropriate from a limited geographical standpoint to analyze direct, indirect and cumulative effects. However, it is yet another case of the potential of de	Delineation of the "Lynx Analysis Unit" was direction given by the interagency (state and federal) Lynx and Wolverine Steering Committee. It is not meant to be an actual home

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			facto critical habitat boundary and should only exist for initial planning purposes.	range of a lynx, just an analysis tool for tracking changes to habitat.
235	33	33200	HU S2 and HU G11 are both based on the conclusion that ski area operations interfere with lynx security habitats which should be protected from regular and concentrated human activity. A contrary conclusion in Roe and Poole, [A Review of Lynx Behavior and Ecology and its Application to Ski Area Planning and Management] suggests that lynx demonstrate tolerance to such human activity. This is an area which needs more study, and in the meantime should be governed by guideline HU G11 in Alternative D.	<p>The "Roe Report" was reviewed for the analysis, even though it is not a research paper, nor peer-reviewed scientific literature. Both the "Roe Report" and the DEIS analysis acknowledge the lack of evidence regarding snow compaction and competition, either supporting or refuting the hypothesis.</p> <p>The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Dispersal travel movements may be much different.</p>
235	4	33200	The best overall management program is to find a way for lynx to thrive while living side-by-side with humankind, and to use the best science-driven data to make a precise management decisions affecting those lynx we know about instead of a broadly-applied management program which may or may not ultimately have any effect on a specific lynx or populations of lynx.	The Forest Service has an obligation under many laws to provide for viability of native (and desired non-native) wildlife species. National Forest Management Act (NFMA), National Environmental Policy Act (NEPA) the Endangered Species Act (ESA) all provide the mandate to conserve native wildlife species. The lynx is a wide-ranging species that needs to have some management considerations at the large scale, according to the best science available. One of the listing factors was the lack of regulatory mechanisms in Land Use Plans (BLM) and Land and Resource Management Plans (USFS) to ensure the conservation of lynx. The amendment for the Southern Rockies is needed to enable the species to be delisted in the future.
235	3	33200	[The State of] Colorado proposes that the Forest Service use Colorado's data to do very specific and precise management of those areas where lynx inhabit and establish their territory. "Broad brush stroke" management decisions driven completely by this one species will detract the Forest Service from it's multiple - use mission and drive a wedge between the general public and Colorado's highly popular lynx reintroduction program.	
235	1	33200	Colorado's lynx reintroduction efforts enjoy tremendous popularity among the State's citizens. To date the project has met with little objection even though some restrictions have had to be placed on hunters and ranchers who interface with lynx habitat on a daily basis. However, the enormous potential impact of these Amendments and how they affect private land use and the multiple-use mission of the U.S. Forest Service is highly	We do not consider the changes proposed in this amendment to be a significant change. There would be no affect to any private land use from this amendment. The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans.

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			problematic. [The State of] Colorado urges the Forest Service to approach this amending process with care and precision, avoiding any unsubstantiated land use decisions which unfairly and unnecessarily limit other multiple-use obligations. All decisions must have thorough scientific underpinning.	
235	2	33200	Of particular concern is the court-ordered designation of critical habitat by the U.S. Fish and Wildlife Service to be in draft form by November of 2005. Colorado cannot emphasize this enough to warn the Services that what is put in place by these Forest Plan Amendments could easily establish patterns for critical habitat boundaries.	Critical habitat has been identified by the FWS; however that decision is now being reviewed. Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendix F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences.
236	2	33200	Without getting into the specifics of vegetation standards, human-use standards vs. guidelines, etc., I do think some mixing and matching of standards and guidelines from Alternatives B, C and D is appropriate and better left to the Forest Service. In this mixing and matching, it is imperative that habitat for snowshoe hares is maintained, that important corridors for movement and migration are maintained, and that appropriate human uses continue to be permitted so that we keep faith with our constituents.	Comment noted.
238	3	33200	GTR RM-254 states, "approximating the natural disturbance frequency and spatial patterns present on the landscape is expected to provide the best habitat for lynx". Yet nowhere in the DEIS is there any analysis of natural disturbance frequency or spatial patterns, a comparison to current disturbance frequency and spatial patterns, or direction for desired disturbance frequency and spatial patterns.	The amendment is programmatic in nature and covers National Forests in most of Colorado and southern Wyoming. However, VEG S1 suggests doing a broad scale assessment that describes historical levels of habitat conditions, or limiting disturbance (canopy removal) within each LAU to no more than 30%. A broad scale assessment would need to be done at the Forest level, based upon the Historic Range of Variability assessments, which are in the process of being completed in Region 2.
242	1	33200	Research in Colorado and elsewhere continues to support the recommendations of the (LCAS) as the best approach to ensure lynx	Alternative B represents the management direction most closely associated with the LCAS, which is based on the best

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			conservation. Where we lack data specific to Colorado, we have leaned toward a conservative interpretation of other lynx research findings. Specifically, the following criteria are integral to maintaining lynx: 1) Forest land must support habitat for snowshoe hares which are the primary prey source; 2) Forest land should provide some degree of connectivity from one lynx core area to another; 3) Forest land should protect denning habitat which must include dense woody debris. We found that none of the alternatives described adequately met these criteria while providing appropriate and necessary management flexibility.	available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
243	3	33200	There is no need to change the forest plan for something that is totally questionable as far as survival? If the lynx survive it should be with what management is already in place.	Comment noted.
246	40	33200	The Department [of the Interior] recommends that effects analysis should be limited to a single LAU for vegetation management actions in the SRMGA. One of the major principles in the LCAS limits conversion of suitable lynx habitat to unsuitable lynx habitat to no more than 30 percent of an LAU. This measure is based on our limited understanding of how large-scale environmental changes affect lynx populations in the contiguous United States, in part due to the lack of appropriate broad-scale habitat assessments. Application of conservation measures at the LAU scale requires blocks of quality lynx habitat to be maintained within each LAU, maintaining a good distribution of lynx habitat conditions at the scale of a lynx home range, thereby maintaining a good distribution of habitat conditions across the range of lynx. Standard VEG S1 applies the 30 percent conversion, but at a scale that can include adjacent LAUs. If the limitation of the 30 percent conversion to unsuitable habitat is analyzed at a larger scale than the LAU, it can result in large contiguous areas devoid of suitable lynx habitat. This could result in the isolation of areas of suitable lynx habitat, and the displacement or indirect mortality of lynx.	Comment noted.
246	43	33200	Standard VEG S2. The Department is concerned about the ability of this guideline to provide adequate regulatory mechanisms to conserve lynx. The Department anticipates that if this guideline is not followed frequently, negative effects could accumulate in the SRMGA, and may result in the inability of the lynx population in the SRMGA to survive and recover. Please provide adequate analysis to address the likelihood that the guideline would be followed and describe the short- and long-term effects of nonadherence to the guideline on lynx conservation and recovery.	All Guidelines in Forest Plans are generally implemented, unless a compelling case can be made in the analysis and decision documents why they are not being followed/implemented. Implementation of guidelines will be monitored.
246	7	33200	The Lynx Steering Committee and Lynx Biology Team were chartered to	Alternative B represents the management direction most

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			develop acceptable protocols for the review and incorporation of new research and other pertinent information into conservation measures for lynx. In doing so, some measure of consistency and scientific credibility is ensured to increase confidence that Forest Service and BLM actions and management direction in general work to conserve lynx. We suggest the Forest Service not ignore the importance of using the best information and credible application of that information, nor the difficulty of managing a species that occurs across a broad geographic range and for which science is still developing.	closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
246	30	33200	Standard ALL S1 states that new or expanded permanent developments and vegetation management practices and activities must maintain habitat connectivity. Under Alternative D, Standard ALL S1 would not apply to fire-use practices and activities that restore ecological process. The terms "fire use practices and activities" and "ecological processes" are vague and encompassing concepts. In the DEIS glossary, the term "fire use" is defined as "the combination of wildland fire use and prescribed fire applications to meet resource objectives" The term "ecological processes" is defined as "the flow and cycling of energy, material, and organisms through an ecosystem." The Department believes that exempting these fire-use practices from Standard ALL S1 will make it difficult for the Forest Service to meet the standard's objective of maintaining or restoring lynx habitat connectivity. Please address possible adverse effects to lynx and effects on lynx conservation and recovery in the SRMGA that may result from implementation of the wildland fire use exemption. In particular, exceptions for fire use, as described here, should be considered under vegetation management standards only.	Comment noted.
246	22	33200	Throughout the document, the term "persistence," instead of "conservation" or "viability", is used in conjunction with recovery. The Forest Service traditionally discusses the effects of management activities in terms of the alternative being able to maintain "viability" of individual species. In order to eliminate any confusion and to be consistent with the Purpose and Need and past practices, we recommend that the terms "conservation", "persistence", and "viability" be defined and applied appropriately and consistently throughout the document.	The term "likelihood of persistence" was used in the analysis discussion, as it was a qualitative assessment, not a quantitative one. The word viability may have implied to some a formal Population Viability Analysis, which takes much more quantitative data than we have available. Therefore, the term "persistence" was used to discuss population viability in qualitative terms.
246	21	33200	The Department recommends that processes, actions, or types of actions that would be exempt from lynx standards be clearly identified in the DEIS. The Department suggests that specific elements, identified as guiding processes by the Forest Service and BLM, be identified and addressed individually in Standards and Guidelines. This would allow an analysis of	Comment noted.

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			effects to lynx and lynx habitat. The USFWS looks forward to working with the Forest Service and BLM to ensure efficient implementation of needed fuel treatment projects, while ensuring the conservation of lynx habitat.	
246	19	33200	Most information in the DEIS and discussions we have had with the Forest Service indicate that fuel treatment projects could be designed within the limits found in these standards. Therefore, we recommend maintaining suitable habitat, limits on rates of management-caused change in lynx habitat, and denning habitat requirements in general plan direction to increase confidence that the plans will conserve lynx and lynx habitat and allow management flexibility.	Comment noted.
5	4	33210	This bogus "reintroduction" program is vicious and cruel to the Lynx. The Canadian Lynx are adapted to Canada not to the Southern Rockies. They are uprooted, stolen, from their home territories, tossed into a non-Lynx environment, forced to eat either plague-ridden rodents or factory-created snowshoe hares, treated by a government they don't even know exists as if they were poverty-stricken and needy wards of the state which they are now but were not back home. The Lynx try to get back to Canada where they can find more snow, more hares, more cold, drier snow, long dark nights, brushy forest, soft ground, fewer fur entangling burrs, fewer sharp rocks, fewer days and nights of wet snow, fewer plague-ridden rodents. But they can't get back because it is too far and too hostile a trip. They die trying. They don't need special travel corridors – they need to not be transplanted.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort.
8	3	33210	The DEIS does not adequately identify which portions of the affected national forests will be affected by the proposed amendments. The headings for the proposed direction contain several variations of "Applies to lynx habitat in Lynx Analysis Units (LAUs), and in linkage areas subject to valid existing rights". However, the only details are a very broad-scale map and a description of Procedures for Lynx Habitat and Lynx Analysis Unit Mapping. Without detailed information about the location and extent of lynx habitat and linkage boundaries, the Forest Service is simply not in a position to accurately analyze and describe effects and potential impacts. The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are, or how they are identified.	The map in the DEIS is small and difficult to see the details. This map was improved for the FEIS. Larger scale maps were available electronically and were available for review at the public meetings. The final includes a small scale map; however, the analysis was based on reviews of appropriate scale maps. Lynx habitat mapping was a biological inventory, which was done in an interagency process.
20	3	33210	The lack of historical evidence that the lynx were ever in this area and the fact that they are "Canadian Lynx" is of great concern.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance.

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38	2	33210	Native Americans thrived in this area for generations before Europeans settled in this area. According to English to Ute Dictionary by the US Office of Education (May 1976), the Utes (who lived in this area) do not have a word for lynx. They have a word for bobcat and mountain lion. If the lynx had existed in this area, I believe that a word for the lynx would be in their language.	The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans. The lynx translocation program is being done by the State of Colorado, Division of Wildlife.	
38	3	33210	If the lynx have never been in this area there must be a reason why. Perhaps the environment does not suit their species. Please do not restrict our activities because of a species that has never been able to thrive here in the past. They may not thrive now either.		
41	3	33210	Enough time and money has been invested in this project. Let them be, they will either do well or disappear, after all, this is marginal lynx environment at best.		
43	2	33210	I have doubts about the existence of lynx in this area. If lynx have not been able to thrive in this area before, they may not be able to survive now either. I do not want activities restricted in this area for a project that may not survive anyway.		
44	3	33210	I would like to see a successful lynx release program if: Just because your introducing an "endangered species" you will not lock up release areas from public use to protect them. By closing public access into National Forest will ensure more conflict between CDOW, USFS and public.		
44	2	33210	I would like to see a successful lynx release program if: There is usable lynx habitat and food where they are being released and will sustain them for years to come. Starvation is unacceptable and cruel!		The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
44	4	33210	I would like to see a successful lynx release program if: The reasons for the release program (which according to some respectable researchers the reason for this "release program" has not been verified) is strictly biological and not political!		
47	2	33210	Please don't support your experiment any longer. I have read in the paper several have died already.		
41	2	33210	I like wildlife but I believe the lynx program has become a tool to stop most activities on public land. It seems to be convenient to use the lynx on some projects but ignore them when it comes to land trades, i.e.: Rio Oxbow Land Trade.		
92	2	33210	I have doubts about the ability of the lynx to survive in this area. I do not want the forest activities to be severely restricted because some environmentalists want a "threatened" species to flourish. They are		

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			flourishing; in Canada, not in Colorado. I believe that the Canadian lynx should be allowed to thrive in their natural habitat and not placed in southern Colorado.	
77	14	33210	The government agencies attempting to "restore" the lynx to this area (assuming it ever inhabited this area in the first place) are successfully killing or losing more than half of the lynx they transplant. This must come as a horrible shock to the lynx itself, which is being killed in order to save it.	
62/3; 63/3	3	33210	The CDOW is conducting an experiment in this State to determine if they can force the Canadian Lynx to adapt to this non-native area. Please don't support their experiment any longer; Nature will ultimately cause the Canadian Lynx to retreat to its home in Canada, Alaska and other locations where it is a Native Species.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort.
62/2; 63/2	2	33210	The Canadian Lynx doesn't deserve any protection in this State because it is a non-native species and has been considered "rare" and extremely rare" in this State for as long as recorded history shows. If you don't believe me, read the Colorado Outdoors magazine, Jan/Feb of 1977 issue, pages 2 and the inside cover. Or, you can read Tom Andrews report (commissioned by the CDOW) pages 14, 48 and 49.	"Rare in the state" does not mean it is a non-native species. The Forest Service has an obligation under many laws to provide for viability of native (and desired non-native) wildlife species. National Forest Management Act (NFMA), National Environmental Policy Act (NEPA) the Endangered Species Act (ESA) all provide the mandate to conserve native wildlife species. The lynx is a wide-ranging species that needs to have some management considerations at the large scale, according to the best science available. One of the listing factors was the lack of regulatory mechanisms in Land Use Plans (BLM) and Land and Resource Management Plans(USFS) to ensure the conservation of lynx. The amendment for the Southern Rockies is needed to enable the species to be delisted in the future.
95/16; 127/16	16	33210	A biologic truism is that "everything is rare somewhere". The national forests included in the Southern Rockies Lynx DEIS are at the periphery of lynx population distributions, and have never provided more than marginal lynx habitat or populations (see numerous references to that conclusion in GTR RM-254, the LCAS, the Federal Register, and the DEIS). As the Fish and Wildlife Service stated in its decision to list the Canada lynx (Federal Register, March 24, 2000). "In the...Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population". Further, the Fish and Wildlife Service (Federal Register, July 3, 2003) referred to "a total of 22 positive lynx reports...in [Colorado] records since the late 1800s", to	The National Interagency Lynx Biology team, and the Interagency (state and federal) Lynx and Wolverine Steering Committee included southern Wyoming and Colorado as lynx range, based on the best science available. See project file for mapping direction from Lynx and Wolverine Steering committee. As such, the Forest Service has a mandate to conserve native wildlife species. Lynx habitat delineations were done using the differing forested structural stages. (See each Forest's habitat mapping criteria and rationale in project file).

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			naturally highly fragmented montane and subalpine ecosystems which "has always limited the potential for lynx", and conclusions that "a resident population [of lynx] never existed in southeastern Wyoming" and "the most likely cause for the loss of resident lynx populations in Colorado was a natural process because lynx in this region are isolated from source lynx populations and habitats". Yet, in this DEIS the Forest Service has proposed to implement forest plan direction for the national forests in Colorado and southern Wyoming as though those national forests contain prime habitat for the recovery and conservation of lynx. Today's computer mapping technologies allow forest managers to map forests according to areas with differing structures, and to plan a course of action to diversify forests using fire and thinning and regeneration harvests (see January 1998 Journal of Forestry, "Integrating Wildfire into Strategic Planning for Sierra Nevada Forests).	
97	1	33210	The only reason I have to see the Lynx and the wolves brought back into forests is that people on motorized vehicles chase the lynx and wolves out of the forest.	
97	2	33210	The only reason I have to see the Lynx and the wolves brought back into forests is that the farmers and ranchers start to kill them as a lot of them don't know where to hunt or they either die or the ranchers kill them.	
98	3	33210	The DEIS states that this program was developed based on the best science available. I believe that is not true for a couple of reasons: DOW has happily reported up to six litters of kittens this year; however, I have been told (on good authority) that up to three of those may be hybrids with bobcats. New, then: the Minnesota DNR has been studying exactly this for some years; its research is available on the internet, and was reported in the Minneapolis newspaper last springs. It seems when lynx are taken too far south of their natural habitat, they do indeed interbreed with bobcats. It is not yet known whether 1. the hybrids are protected under the ESA, and 2. they are sterile. If not sterile, we have a new species. If they are sterile, nothing of sustainable value has been created. Bobcats do thrive in this territory; perhaps there's reason why lynx haven't. In any case, it appears research has been available and not considered; therefore, the best science was not used for this program. Montana also seems to have research similar to Minnesota's. DOW has not publicly discussed whether hybrids exist, or what to do about them if they do. If hybrids do exist here, the lack of candor by the agency responsible is disturbing, as is its determination to release 40 more lynx this year. One can't help wondering whether this effort is propelled by misplaced zeal or ambition instead of a	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. No hybridization has been documented in the western U.S.

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			true concern for the animals.	
98	1	33210	This reintroduction project was begun based on flimsy to nonexistent scientific evidence. The promoters claimed there was one sighting near Vail in the 1970's, with no absolute documentation. Even if it existed, the animal could have been a stray, out of its natural range. Further, the presumption that the lynx were trapped out years ago is only that, so ought not to have been used as justification. There has been little or no evidence publicly reported that lynx ever existed in a natural population this far south.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. Lynx have been historically documented as far south as Conejos County, in the very southern part of Colorado. The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
99	5	33210	The Canadian Lynx is a non-native species, otherwise it would have been called the "Colorado Lynx"! I urge you to not support this experiment with the Lynx.	
101	2	33210	When the DOW planted the first five, only one survived, which was living by our pasture. It survived, on our domestic ducks and turkeys. The DOW bragged about how well it was doing but never told anyone that it was at our expense.	
105	3	33210	The Canadian Lynx is being brought into Southern Colorado, into a habitat that will probably prove to be unsuitable before long. This area has never supported a lynx population and no one has given a reasonable explanation as to why it will now. I can't, in good conscience, look at the reintroduction as anything more than an effort to keep even more of us out of more of the forest. I am opposed to anything that will restrict my responsible use of the forest.	The purpose and need of the amendments includes conservation of lynx as well as preserving the multiple use direction in existing plans. The lynx was not extinct in Colorado. It was, however, believed to be very rare. The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
109	19	33210	Keep in mind the lynx was extinct in Colorado. We brought it back voluntarily from Canada and now through this DEIS we will be risking the economy of our state to ensure its viability. I suggest we try a much smaller set of management restrictions which are already in place through diversity requirements in standards and guidelines in all the individual forest plans perhaps adding a few specific additional management suggestions (ensuring denning habitats for snowshoe hares adding for example) rather than allow this far-reaching, state-wide umbrella DEIS to be accepted public policy.	
109	3	33210	Colorado voluntarily re-introduced the lynx and now you are imposing severe restrictions on all sorts of activities through this DEIS. Now, what precedence are you setting for anyone else who might want to help a species recover? You are setting forth a huge disincentive. That is totally wrong.	

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113	1	33210	The Canadian lynx has been sold to us as a threatened species by false science. The animal is not threatened, as anyone north of the U.S. border would testify to, nor is the habitat being considered for these animals, in this part of the country, adequate for their continued survival. If the reintroduction plan fails it will only provide fodder for those who believe the false science and this would be a travesty to the majority of forest users.	
118	3	33210	The lack of historical evidence that the lynx were ever in this area and the fact that they are "Canadian Lynx" is of great concern.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance.
130	2	33210	There is no evidence that lynx were ever this far south in the Rocky Mountains. And there is no evidence that this introduction will even work. To import a species from another country and try to make them survive is not only wrong it is inhumane.	
132	3	33210	The CDOW is conducting an experiment in this State to determine if they can force the Canadian Lynx to adapt to this non-native area. Please don't support their experiment any longer; Nature will ultimately cause the Canadian Lynx to retreat to its home in Canada, Alaska and other locations where it is a Native Species.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendments for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. The two efforts are unrelated; the USFS would be amending the Forest Plans for lynx habitat regardless of the state's efforts.
132	2	33210	The Canadian Lynx doesn't deserve any protection in this State because it is a non-native species and has been considered "rare" and extremely rare" in this State for as long as recorded history shows.	
135	2	33210	With a quick look at almost any map, it is quite evident that Silverton and San Juan County are practically surrounded by Wild and Wilderness areas. The Weminuche of 400,000 plus acres (larges in the 48) is sitting right on our southern doorstep. With motor vehicles restricted and founded to preserve the so called "natural environment", wouldn't logic and common sense dictate that the cats be transplanted there? Yet, you seem determined to release them right in the middle of our mining districts, highways, jeep roads, snowmobile trails and Silverton Mountain (our one and only struggling ski area), all of which added together in an area smaller than the wilderness itself.	
137	2	33210	We are concerned that the ALL S2 standard - (p. S-5 of the Summary) may result in short term adverse effects to lynx (and ignores LCAS recommendations). Because this species is just beginning to be successful in reproducing and the re-introduction efforts are still beginning - any short term adverse effects should be avoided.	
152	3	33210	If lynx have not been able to thrive in this area before, they may not be able to survive now either. I do not want activities restricted in this area for	

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			a project that may not survive anyway.	abundance.
140	1	33210	This is nothing more than a response to pressure from a well-funded environmental group. It makes no more sense to try and introduce lynx to this area than to introduce the South American Jaguar. There is no scientific or reliable evidence that the lynx has ever existed in this area. The same is true for the jaguar. Where then is the rationale for trying to introduce an animal which flourishes in Canada to an area where it never was? There is no logic.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
141	1	33210	I would like to offer some thoughts: There is no evidence that the earlier introduction of lynx in the Creede area has met with any success. Facts are facts...this just isn't "their type of environment", and I don't believe we should try and alter nature. Based on my study of the matter, the lynx has never existed in this area, and trying to make it so is not scientifically supported. Thus, there is no reason to believe that the proposed "forced introduction" will even work.	
228	3	33210	I have serious concerns that the lynx have never been able to consistently exist in this area. I do not want forest activities to be restricted because of potential harm to the lynx when they may not be able to exist in this area anyway.	
150	8	33210	Flexible lynx standards and guidelines also allow the Forest Service to tailor its project-level decisions to take into account the best available scientific information that exists at the time of the decision. So long as a no adverse effect determination can be made, the Forest Service should allow new information - such as future Colorado Division of Wildlife lynx reintroduction data - to be relied upon in site-specific decisions. Otherwise, the Forest Service is forcing itself to make future decisions based upon what was known in 2004 or, as the WRNF has proposed, based on what was known in 1999. That is why All Standard 2 of Alternative D is good policy - it allows new information to be relied upon so long as the agency determines that no adverse effects to lynx will occur.	Comment noted.
150	12	33210	The Colorado Division of Wildlife ("CDOW") within the Colorado Department of Natural Resources has reintroduced 129 radio-collared lynx into Colorado since 1999. The CDOW regularly monitors the lynx. That reintroduction effort generates significant data about lynx, their behavior in the Southern Rockies, their habitat and prey preferences, and their tolerance of human activities.	Comment noted. The Forest Service has cooperated with the CDOW, as the Department of Natural Resources is a "Cooperating Agency" officially on the lynx amendment process. They provided the Forest Service with the most recent data available
152	2	33210	The following reference places doubt about the existence of lynx in this area. Year 2000: Ecology and Conservation of Lynx in the United States;	There may have been an error in that report, as there was a specimen found near Cumbres Pass in Conejos County.

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			Ruggiero, Aubry, Buskirk, Koehler, Krebs, McKelvey: Table 8.1 shows no verified presence of the Canadian Lynx since 1974. On page 209 of this same report they state that "In the West, however, Colorado and Oregon have a high proportion of visual data (Table 8.1), and the patterns in these states should be considered less reliable." In Chapter 8, page 230 this report cites a specimen collected from Cumbres County in the late 1800's; there is not nor has there ever been a Cumbres County in Colorado according to the State of Colorado website.	
216	2	33210	Colorado citizens, including us, back the CDOW Lynx reintroduction program by an overwhelming majority and regard USFS Region 2 backtracking on effective habitat conservation strategies as counter-productive and poorly considered in relation to this important investment in Colorado's wildlife.	Comment noted.
221	4	33210	It's important to establish quantifiable monitoring indicator goals, so that forest managers in the Rio Grande or San Juan National Forest can measure reintroduction using habitat analysis that reflects good conservation biology.	Colorado Division of Wildlife will continue to monitor the population of lynx, the USFS will continue to monitor the habitat for both lynx and snowshoe hare. Comment noted.
221	2	33210	The residents of Colorado want to see a CDOW Lynx reintroduction program and we feel USFS region 2 is negating their responsibilities on implementing effective habitat conservation strategies in relation to investing in Colorado's future wildlife potential.	Alternative B represents the management direction most closely associated with the LCAS, which is based on the best available science. Alternatives C and D are alternatives that provide for different mixes of management flexibility within the framework of the LCAS.
231	2	33210	Past history of lynx occurrences and naturally marginal geologic and vegetation habitat components make a significant lynx response appear unlikely. It is not expected that recovery efforts in Wyoming will play a meaningful part in delisting lynx, or that any habitat we might have or could develop here would be considered critical in terms of the Endangered Species Act.	Comment noted.
17	1	33220	The section titled Predator Control, included in Chapter 3, page 16, has some inaccurate statements regarding predator control activities within Colorado. Although predator control activities do occur on public lands, only live traps and shooting are utilized on these lands. Due to the Colorado State Constitution, Article XVIII, Section 12b, no leghold traps, snares, any instant kill body-gripping design trap, or poison may be used on public lands. An exemption is provided for the protection of agricultural resources on private lands, but this exemption does not extend to agricultural resources on public lands. As stated, these restrictions only apply to public lands in Colorado.	Error noted, this will be corrected in the FEIS.

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64	73	33220	The DEIS does not mention that ranchers and sheep herders kill predators both legally and illegally and may account for some unknown, likely human-caused lynx mortality mentioned in the DEIS and the FWS Remand Notice. This risk is well documented for grizzly bear and gray wolf mortality.	Chapter 3, page 48 of the DEIS mentions illegal shooting mortality, and takes it into account in the cumulative assessment of persistence of lynx in the SRMGA.
64	67	33220	As stated by the FWS in the Remand Notice "We conclude there is a threat to the contiguous United States lynx population from incidental catch by trapping, snaring, or hunting. We conclude this threat is low, although there may be an increased risk to small, local populations from incidental catch depending on when it occurs in the population cycle; however, we have no information regarding how frequently incidental trapping, snaring, or hunting of lynx occurs." Given its small, monitored population, it would appear that the risk is significant in Colorado. At a minimum, the Final EIS should discuss the risk, disclose what its likely impacts are, and identify measures that could be proposed to minimize the impacts (e.g., education about lynx prey, its threatened status, and penalties for intentionally or unintentionally killing lynx).	Trapping, snaring and hunting are all managed by the states, and are outside the scope of the Forest Plan amendments. However, the risk to the "persistence" of lynx in the Southern Rockies due to these incidental mortalities was factored into the cumulative assessment on page 48 of the DEIS.
64	65	33220	While surveys did not cover the entire State they were sufficient to conclude that lynx are rare in the Southern Rockies. The key suppressing factors were stated to include commercial trapping and indiscriminate predator control. It is uncertain from the DEIS whether the lynx was extirpated as a result of trapping and predator control or if there were other significant factors.	Track surveys in the state of Colorado in the 1990's indicate that the lynx was never completely extirpated from the state, but was extremely rare. The key historical suppressing factors are uncertain, but likely a combination of trapping, predator control and fire suppression, and more recently, road mortality.
64	63	33220	Our comments regarding other dismissed factors that were not evaluated in the DEIS are presented below. The Final EIS should address whether predator control activities occur on USFS grazing allotments or other lands.	Page 16 of Chapter 3 in the DEIS does discuss the fact that predator control activities take place on NFS lands, and that none of the alternatives change anything from the existing situation. More detail will be added to the Final EIS.
126	56	33220	The LCAS directs that predator control be conducted in accordance with a U.S. Fish and Wildlife (FWS) consultation process (p. 87). There is no mention of this on the proposed amendment. A FS spokesman claimed that this is the responsibility of USDA Wildlife Services, but the FS and BLM also have authority and responsibility regarding predator control operations in their land, and a responsibility to ensure that lynx and other protected species are not at risk from these operations.	The Forest Service and BLM do have some responsibilities regarding predator control, and this is mentioned in the DEIS in Chapter 3, pages 16 and 48. The USFS authorities under NEPA regarding predator control will be added to the discussion in the Final EIS in those sections.
128	1	33220	You state in the draft that trapping is not a concern because there is no trapping in Colorado. That is not true. We trap on private land. There is trapping on private land to help the farmers and ranchers to help protect livestock from predators. The Colorado Trappers Association is concerned	Trapping is regulated by the state. It is discussed in this document as one of the potential risks to lynx, and factored into the cumulative analysis section.

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			not only with damage control of the lynx, but also with who will take responsibility for the damage and payment for the same. This damage of course being the damage caused by the Canadian lynx to the livestock and other property of the farmers and ranchers.	
64	41	33230	Road closure and obliteration should be considered when timber harvest and other USFS activities are completed. Roads may increase access for legal and illegal hunting and trapping, directly and indirectly destroy habitat for prey, adversely affect lynx travel and hunting patterns, and increase winter snowmobile use in LAU areas served by those roads.	HU G9 provides guidance for road closure and obliterations after project activities. (Chapter 2, page 30 of DEIS).
64	66	33230	Illegal hunting or poaching was stated to be regulated, yet the DEIS indicates that it accounts for at least six of 45 known deaths that have occurred to reintroduced lynx in Colorado; accounting for 5% of the State's reintroduced population. Another six lynx were killed by probable human causes, according to the DEIS. Hence, the threat of human take is significant and should have been addressed and evaluated.	Incidental illegal shooting mortality was taken into consideration for the cumulative assessment of "likelihood of lynx persistence" in the SRMGA. (DEIS Chapter 3 pages 46-49).
64	39	33240	Additional work may be warranted to determine whether USFS roads are a significant source of lynx mortality in the Southern Rockies. Further discussion is needed in the Final EIS about the uncertainty and the available science. Given the significant road-associated mortality of reintroduced individuals (six out of 45 known deaths, from a total reintroduced population of 129 animals), there is reasonable evidence that the impact may be significant factor in the former extirpation of the State's native lynx population. While the LCAS concluded that unpaved roads should not be detrimental to lynx, vehicle collisions on them and on highways that bisect Colorado's National Forests may be significant.	Comment noted. The DEIS Chapter 3 page 48 mentioned this risk factor, which contributed to the cumulative assessment and conclusion on pages 46-49.
64	62	33240	On page 1-5, the DEIS states that trapping, predator control, shooting, highways, and predation by other species are not addressed. Those omissions would seem imprudent, given the data in the DEIS regarding lynx mortality and causes.	Highways are addressed throughout the document, both in new standards and guidelines, as well as the analysis. Changes in the management of trapping, predator control and shooting/hunting/poaching are outside the authority of the USFS, but are considered as far as the cumulative assessment of effects to lynx.
77	13	33240	The DEIS sets forth misleading statistics related to the number of lynx artificially introduced by the Colorado Division of Wildlife (CDOW), and the number of casualties among those introduced. DEIS at 3-10. The DEIS states that there have been 46 known mortalities among the 129 individuals released. In fact, according to CDOW, "Of the total 129 adult lynx released in 1999, 2000 and 2003 we have 51 known mortalities."	The CDOW periodically updates their website information. The information displayed in the DEIS was obtained when the analysis was being conducted. The FEIS will incorporate updated information as available.
64	83	33250	In the section on denning (page 20), information would be helpful	Comment noted. These potential indirect impacts will be

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			regarding when the lynx actually uses the den and raises its young. While that section discusses the availability of lynx denning habitat, nothing is mentioned of potential risk factors such as timber salvage or livestock grazing that may occur in proximity or in the denning habitat during the denning period. Such activities may directly affect lynx reproduction and rearing and may attract potential lynx predators to the vicinity of the den.	added to the Final EIS.
95/59; 127/59	59	33250	The one positive element of this standard is that it does identify a desired level of denning habitat of 10% of an LAU. This would make a good start to identify objectives for all lynx habitat conditions within an LAU.	Comment noted.
95/17; 127/17	17	33250	Ideal lynx habitat in the Rocky Mountains consists primarily of two structurally different forest conditions occurring at opposite ends of the stand age gradient. According to the LCAS, the lack of widespread disturbance process in lodgepole pine have led to highly stocked, even-aged mature stands that are not useable by hares as foraging areas in the SRMGA. The late successional spruce/fir forests by contrast do provide for forage for hares and are more valuable than mature lodgepole forests. However, the Washington Department of Natural Resources Lynx Management Plan notes that "old growth" is not the requisite; rather, they observe that "dense cover in the form of blowdowns and piles in any habitat was utilized". Lynx require early successional forests that contain high numbers of prey (especially snowshoe hares) for foraging and late-successional forests that contain cover for kittens (see GTR RM-254). Lynx habitat conditions in the SRMGA are not ideal as the acreage of national forest in Colorado and southern Wyoming are not diverse, but are dominated by mature to over-mature structural stages. Recent landscape scale disturbances, i.e., fires, insect epidemics and blowdown, will result in a more diverse forest; careful timber harvest will also result in a more diverse forest, especially in lodgepole pine.	Comment noted. The objectives, standards and guidelines encourage timber harvest in lodgepole pine (Chapter 2).
95/5; 127/5	5	33250	The proposed amendments are equally applicable to all vegetation that "could [emphasis added] contribute to lynx habitat", as mapped by lynx biologists, despite acknowledgement by the US Fish & Wildlife Service that "In the ...Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population."	The Forest Service has an obligation under many laws to provide for viability of native (and desired non-native) wildlife species. National Forest Management Act (NFMA), National Environmental Policy Act (NEPA) the Endangered Species Act (ESA) all provide the mandate to conserve native wildlife species. The lynx is a wide-ranging species that needs to have some management considerations at the large scale, according to the best science available. One of the listing factors was the lack of regulatory mechanisms in Land Use Plans (BLM) and Land and Resource Management Plans(USFS) to ensure the conservation of lynx. The

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				amendment for the Southern Rockies is needed to enable the species to be delisted in the future.
106	55	33250	While the USFWS (2000) did not identify ponderosa pine (<i>Pinus ponderosa</i>) forest as potential lynx habitat, it is highly likely that ponderosa pine historically provided lynx habitat in the Black Hills.	We did not find evidence that lynx occurred historically in the Black Hills.
106	56	33250	The cooler and wetter climate of the northern and central Black Hills strongly indicates that suitable habitat for the lynx exists and historically existed in the Black Hills.	
117	5	33250	To incorporate management flexibility to address forest health when managing lynx habitat or to strengthen it, I am proposing the following additions to Alternative D: VEG G8. Add - If natural denning habitat is limiting, consider creating artificial denning habitat.	Comment noted. VEG G2 is very similar to the suggestion.
126	10	33250	Even if the lynx protection provided in Alternative E were adequate to restore lynx, there is no assurance that those lynx protections will be implemented. The Forest Service re-words a standard in Alternative B to protect lynx denning habitat comprises less than 10% of a Lynx Analysis Unit (VEG S3) to allow such projects to proceed if they "move towards" providing 10% lynx denning habitat by leaving woody debris on the forest floor. The Forest Service fails justify this exemption to the standard to protect lynx denning habitat.	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
150	21	33250	The description and extent of lynx denning and foraging habitat in the DEIS, DEIS at 3-20 to 3-32, should be altered to expressly incorporate data from the CDOW lynx reintroduction.	We are cooperating with the CDOW on the amendment process under a "Cooperating Agency" agreement. When the science is available to make specific revisions to our lynx seasonal habitat delineations for the southern Rockies lynx populations, the habitat delineations will be revised.
211	18	33250	Vegetation Standard 3: The DEIS does not include adequate spatial analysis to properly assess effects to lynx in the SRMGA. Therefore, the CWF recommends removal of exemptions for all alternatives where this standard occurs. We also recommend development of a standard that maintains 10% denning within individual LAU's, is randomly/evenly distributed across the LAU, and ensures recruitment of future denning habitat.	Comment noted.
229	8	33250	I have been in the gas, oil, and power business for over 30 years, am the former CEO of an international energy company, have been a senior consultant to every major U.S. oil and gas company, have been a bowhunter in the southern Rockies since 1973. The losses in habitat and outdoors experience on National Forest lands during this time has been	Comment noted.

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			enormous and irreversible, and we cannot afford to lose any more lynx habitat, or other outdoor forest resources.	
235	22	33250	While contemplating unsuitable habitat concerns, [The State of] Colorado suggests consideration of elevating VEG G1 to a standard, putting the Forest Service in the proactive stance of actively providing for foraging and denning habitat.	All Guidelines in Forest Plans are generally implemented, unless a compelling case can be made in the analysis and decision documents why they are not being adhered to and how the objective will be met. Alternative F was developed for the FEIS based on comments from the DEIS, and VEG S2 would be a standard under the new preferred alternative, which requires a Forest Plan amendment in order to deviate from a standard.
5	5	33260	The DEIS says that in order to artificially support the Canadian Lynx in the Southern Rockies, we must rearrange the National Forests themselves to fit the needs of the Canadian Lynx to migrate long distances, from patch of forest to patch of forest, in order to breed not only amongst other lost souls here in the south but also to trade genes with the core populations of Canadian Lynx that still live in Canada. There is some evidence, not by any means conclusive, that Canadian Lynx can migrate long distances and interbreed with other populations but this evidence is not evidence that we should start up new populations of Canadian Lynx in the Southern Rockies or Northern Rockies or anywhere else. It is an emotional and political leap of logic that suggests we should build Canadian Lynx breeding corridors and start new breeding populations. It is foolishly illogical to rearrange the Forests to fit a foreign animal, especially one that never wanted to be here in the first place. This is not the natural place for lynx – it is the wrong place.	There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. The Southern Rockies is at the southern edge of their range. Lynx have been historically documented as far south as Conejos County, in the very southern part of Colorado. The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
64	48	33260	Conclusions that lynx populations are not threatened by individually harmful activities should be supported and documented in the Final EIS.	Comment noted. The U.S. Fish and Wildlife Service will prepare a “Biological Opinion” regarding the analysis done for the lynx amendments.
64	55	33260	Regardless of the Final EIS direction and decisions in the Record of Decision, monitoring requirements should be included to evaluate lynx populations and trends particularly in areas where actions are taken under the proposed Guidelines that deviate from the LCAS Standards.	Comment noted.
64	64	33260	Our comments regarding other dismissed factors that were not evaluated in the DEIS are presented below. The Final EIS should address whether encounters between domestic animals and lynx populations need to be managed.	The amendment alternatives are based upon the conservation measures recommended in the LCAS. Encounters between domestic animals or bobcats and lynx were not discussed as a risk factor. The lynx translocation program is being done by the State of Colorado, Division of Wildlife. No hybridization has been documented in the western U.S.
239	10	33260	A recent concern about lynx biology that is not addressed in this EIS amendment that may be more of an issue in the near future, is that of lynx	

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			hybridization with bobcats. DNA evidence has surfaced very recently (summer 2003) that lynx and bobcat do hybridize in some situations. The DNA analysis indicates that this has probably been very rare because the two species are distinct in their genetic makeup. From early indications however, the hybrids may be able to produce fertile offspring. If snow compacted areas are bringing lynx and bobcat into the same areas more frequently, then this hybridization may present a concern.	.
106	58	33260	We are unable to understand exactly how the USFS will be monitoring the effectiveness of the proposed lynx amendment. In particular, we are concerned that the USFS will not be monitoring populations of lynx to ensure that habitat protection is truly effective in that it is able to maintain viable populations and conserve the lynx. We request the USFS develop and implement a monitoring strategy for lynx populations and individuals to ensure the proposed lynx amendment actually aids in the recovery of the lynx and fully protects the species from future declines and potential extirpation.	The State of Colorado has an extensive monitoring program for the lynx, with satellite radio collars, flights, etc. The USFS will be relying on their data for population information. The CDOW is also a Cooperating Agency under an official agreement for the Southern Rockies Forest Plan amendment process (for Canada lynx).
115	3	33260	I question if sufficient initial biological baseline survey and monitoring has been done or planned for. Such studies and the presence of cyclic populations of snowshoe hare, escape cover and conflicting uses (like snowmobiles) need to be evaluated before decisions are made.	The Forest Plan amendment process was initiated based on the best available science. Research on lynx and impacts to lynx is on-going, and will be incorporated to Forest Plan Revisions and amendments as it becomes available.
117	15	33260	When addressing the effects on lynx throughout Chapter 3, please assess the risk or to what degree the effects may occur (to individuals or to populations) and the estimated effects in the short term and over the long term.	Effects to lynx in Chapter 3 were either based upon "expected" degree of effects, or when no information was available on what would be "expected" then the analysis was based on "worst case scenario". Worst case scenario with very low populations includes the fact that short term negative effects to habitat might result in no long term populations, therefore, long term effects to habitat becomes a moot point.
134	6	33260	Although there is little data to show the significant effect of one factor alone, it is obvious that between the three factors, that the lynx population will be put into grave danger - an alarming fact given the lynx is already an endangered species listed on the ESA.	The cumulative assessment for effects to lynx are found on pages 46-49 of the DEIS.
211	2	33260	We prefer the normal USFS practice of discussing the effects of management activities in terms of how well they maintain "viability" of individual species. However, this DEIS instead refers to "persistence". The CWF recommends that future DEIS documents return to more traditional USFS terminology or at least define the terms so we can be sure that the terminology is consistent and the alternatives can be fully evaluated.	The term "likelihood of persistence" was used in the analysis discussion, as it was a qualitative assessment, not a quantitative one. The word viability may have implied to some a formal Population Viability Analysis, which takes much more quantitative data than we have available. Therefore, the term "persistence" was used to discuss population viability in qualitative terms.

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211	4	33260	The CWF also is concerned about the manner in which effects are described in the DEIS: The full meaning of the statement "consistent repetitive applications of these exemptions could reduce the likelihood that the lynx population would have the ability to persist", needs clarification.	Comment noted.
64	37	33270	Please consider whether a Vegetation Standard is appropriate in the Final EIS to protect habitat connectivity. Lynx require habitat connectivity to travel between foraging and denning habitats, dispersal, and other movements, but the DEIS did not establish a limit on the size of openings due to timber harvest or other activities. the only research that we are aware of, cited in the DEIS, showed that lynx generally do not cross openings that are larger than 100 meters.	ALL S1 is a standard that provides for maintaining habitat connectivity and this includes vegetation treatments.
149	41	33270	Lynx are known to move large distances beyond identified home range boundaries and therefore need large, connected habitat in order to persist over the long term. See, e.g., LCAS at 34 et. Seq. Habitat fragmentation is one of the leading threats to lynx movement and viability and is, therefore, absolutely critical to their recovery. Wildlife habitat in the Southern Rockies has been fragmented by highways, roads, and vehicle ways; dams, irrigation diversions, and dewatering of streams; destruction and conversion of natural habitat, and other works of civilization, such as urban, suburban, and exurban (ranchette) development. Fragmentation has severed historic wildlife migration routes and has isolated wide-ranging species such as the lynx. See Southern Rockies Ecosystem Project 2003. The FS recognizes that connectivity is one of the most critical lynx management issues.	Comment noted.
149	15	33270	The FS understands and acknowledges problems with all S1, yet persists in including these sweeping exceptions in its preferred alternative nonetheless. It acknowledges, for instance, that exceptions may be harmful to lynx. It notes "[t]he exceptions for fossil fuel exploration and development, as well as the energy transmission facilities are topics that are more difficult to assess at the programmatic level," DEIS at Ch. 3 p. 36, and makes "the assumption that if the above exceptions to the maintaining connectivity standard, ALL S1, are utilized, habitat connectivity could be adversely effected [sic] in the areas of development."	Comment noted.
149	14	33270	The inclusion of such sweeping and unrestricted exceptions to ALL S1 is particularly troubling because the FS acknowledges the importance of habitat connectivity, which is precisely the habitat value ALL S1 seeks to protect. The DEIS notes, for instance, that because "the standard [ALL S1] for maintaining connectivity is critical to the Southern Rockies, any	Comment noted. ALL S1 is a standard that provides for maintaining habitat connectivity and this includes vegetation treatments. The results of this fuels treatment allowance under Alternative D within lynx habitat was expected to be somewhat limited. The estimated potential treatment acres

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			exceptions to this standard would potentially have adverse effects to both individuals and possibly to the local populations of lynx." DEIS at Ch. 3 p. 36. such exemptions, if they were employed with any frequency, would presumably pose a threat to the entire Southern Rockies population as well.	under the fuels exception allowed under Alternative D over a ten year period was slightly more than one percent of lynx habitat. The treatments would be targeted adjacent to communities. This exception is not included in Alternative F.
150	18	33270	What CDOW reintroduction data show that ski areas are a barrier to lynx movement? It is our understanding that the CDOW data show lynx are more willing to cross open areas, including ski areas, than assumed several years ago. This is consistent with the Fish and Wildlife Service's recent rule on lynx, and the Lynx Report from Canada.	The DEIS does not state that ski areas in and of themselves are barriers to lynx movements. It states in Chapter 3, page 35, that "Increased fragmentation and isolation has occurred due to cumulative impacts from highways and residential and recreational development, often tied to ski areas developed on National Forest System lands.
150	15	33270	The Forest Service should "ground truth" the lynx linkage areas depicted in the DEIS at 1-4 and described in Appendix D against the CDOW lynx monitoring data. Have reintroduced lynx been using these linkage areas? If yes, that data should be included. If not, why have these linkage areas been assumed?	In the DEIS, See Chapter 1, Figure 1 page 4 and Appendix D for spatial and narrative descriptions of lynx linkage areas. As more CDOW data becomes available, the linkage areas may be refined in the future by the Wyoming, Colorado and federal interagency team.
150	16	33270	What CDOW reintroduction data, if any, tend to support or disprove the assumption underlying Objective 1 for all action alternatives that "lynx habitat connectivity" is in peril? See DEIS at 1-7.	The lynx habitat connectivity risk, especially in the SRMGA, is discussed in the LCAS, as well as in the Biological Opinion on the Forest Plans and BLM's Land Use Plans. (USFWS 2000).
150	42	33270	Lynx Linkage Areas: How were the lynx linkage areas identified? What evidence supports them? CSCUSA requests the Forest Service to confirm the lynx linkage areas it depicted in the DEIS against the CDOW's lynx reintroduction monitoring data and provide the DEIS against the CDOW's lynx reintroduction monitoring data and provide the information upon which those linkage areas were identified. DEIS at 1-4, Appendix D.	The CDOW was involved in the process delineating the linkage areas, as were all the agencies listed in the response to Letter 95, comment 15. See Appendix D, Appendix F and project file.
150	45	33270	In light of the evidence, it is arbitrary for the Forest Service to suggest that existing operations must be curtailed due to habitat connectivity concerns. CSCUSA requests the Forest Service to revise the discussion in the DEIS at page 3-121 to state that the evidence and literature demonstrate that lynx readily cross ski areas, and that expansions outside permitted ski area boundaries may need to be designed in a way to maintain habitat connectivity if the expansion is shown to be a barrier to lynx movement.	Historic operations at existing ski areas should not be affected by Standard All S1, only new proposals. .
158	4	33270	The proposed amendments are equally applicable to all habitats that "could contribute to lynx habitat", based on maps compiled by lynx biologists. The proposed amendments do not offer any opportunity for public review and comment on what constitutes lynx habitat, where linkage area boundaries are, or how they are identified.	Wildlife species habitat mapping is a biological inventory, not a public input process. The habitat delineations were done in coordination with biologists from the USFS, USFWS, BLM, National Park Service, Colorado Division of Wildlife, Wyoming Game and Fish, Colorado State Forest Service, Colorado Department of Transportation, Federal Highways

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				Administration, and the Wyoming Department of Highways. Initial direction on habitat mapping was given nationally from the interagency Lynx Biology Team and Lynx and Wolverine Steering Committee. See also Appendices D and F. The project file contains each Forest's habitat mapping rationale and criteria, which discussed individual forest differences. and Appendix D.
204	6	33270	Linkage Areas; Retain or modify the following as noted; LINK 01 - Retain as written. LINK S1 - Modify this item to only apply in areas where lynx are known to inhabit LINK S2 - Retain as written. LINK G1 - Retain as written. LINK G2 - Retain as written. LINK G3 - Add this item to require that highway construction or reconstruction in known existing lynx habitat must allow for linkage pathways, either as an overpass or underpass, suitable for all animals who may potentially use such path, including humans. Pathway surface must be of an earthen or natural material(s). Overpasses will be seeded with native vegetation. Sufficient fencing must be utilized to direct pathway flow through the linkage and discourage animal crossing of the highway. Only exception is if such a pathway will require the condemnation of an existing occupied structure, the pathway will not be required.	Comment noted.
211	7	33270	The DEIS states that "the effects to lynx, if habitat connectivity is not maintained, can be a critical factor in the persistence of the population, especially in habitats that are naturally fragmented by open parks and alpine grasslands, such as occurs in the southern Rockies". The analysis concludes that consistent and repetitive application of these exemptions could reduce the likelihood that the Canada lynx population would have the ability to persist in the SRMGA. Therefore, the DEIS should include detailed information and a clear conclusion regarding the effects of the "ALL S1" exemption for Alternative D. The document should clearly state what the effects could be if connectivity cannot be maintained within the Southern Rockies, and it should point out that if persistence of lynx in the ecosystem cannot be maintained, then alternative D does not meet the purpose and need for the action.	Comment noted. The standards and guidelines provide management direction that was noted as lacking when the species was listed as threatened. The final plan will provide protection for the species, while maintaining some flexibility for multiple use management.
235	37	33270	The objectives, standards and guidelines for the management of linkage areas advise the Service to pursue various solutions to preserve linkages, but in the end these solutions could interfere with the property rights of private landowners and create untold financial and managerial havoc on other governmental units entrusted with a specific mission for various lands under their purview (such as highway passage, revenue generation	Linkage areas that have multiple ownerships would likely have coordinated management plans which are formed by stakeholders representing all interests. The objectives, standards and guidelines presented in the forest Plan amendment process cover only the linkage areas that are on NFS lands.

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			for state school lands, access for municipal and county uses, and state park usage - just to name a few).	
235	38	33270	The DEIS identifies 38 linkage areas (DEIS, Appendix D), many of which are outside the jurisdiction of the U.S. Forest Service, but likely to be subject to any management direction ultimately determined by the final EIS for these Amendments and by designation of critical habitat by the U.S. Fish and Wildlife Service shortly thereafter. Colorado believes these linkage areas are best verified and supported by CDOW tracking data as something more than sightings and any conjecture which may be behind these determinations.	The Forest Plan amendment only covers National Forest System lands for management direction in linkage areas. It is based on recommendations in the LCAS. The linkage areas were identified and delineated in a statewide interagency effort, in which the State of Colorado was highly involved.
239	11	33270	There are two State Parks that have linkage paths or defined linkage areas within them. Those are State Forest and Arkansas Headwaters. There are no direct impacts from this EIS amendment on those parks, but we should be aware that they may later be designated as critical habitat for lynx.	Colorado State Forest Service was involved in the delineation of the linkage areas in January of 2001, as well as the Colorado Division of Wildlife, and the Colorado Dept. of Transportation. Comment noted.
246	35	33270	Standard ALL S1, Alternative D. No spatial analysis has been provided in the DEIS to address how this exemption could affect lynx habitat or the landscape linkages.	There is no spatial analysis for this, as there was no information to estimate how this exemption would be implemented. Therefore, the analysis is based on worst-case scenario.
246	27	33270	Standard ALL S1 states that new or expanded permanent developments and vegetation management practices and activities must maintain habitat connectivity. However, as documented in the DEIS, this standard does not apply to fire use practices and activities that restore ecological processes, wildland fire suppression, process-derived fuel treatments, fossil fuel exploration and development, and energy transmission facilities and associated practices and activities. Please identify what actions this standard will apply to, how this standard will help achieve the objective of maintaining or restoring lynx habitat connectivity, and the effects of these exclusions on lynx and their habitat.	The analysis in Chapter 3, page 44 discussed this concern, as well as the "likelihood of lynx persistence" section on pages 46-49.
3	4	33280	For the successful repatriation of this charismatic cat to the ecoregion, the USFS must include language in its final plan that will secure real protection for the species and its habitat. Snowshoe hare, the principal prey of lynx, should be given special management attention, especially in proposed fire mitigation projects.	Comment noted.
20/2; 118/2	2	33280	I am concerned with the Snowshoe population being depleted.	Comment noted. Many of the objectives, standards and guidelines in this proposal are to benefit snowshoe hare habitats.

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106	48	33280	We request the USFS consider region wide adoption of the snowshoe hare as a management indicator species ("MIS"). Region wide selection of the snowshoe hare as an MIS would give the USFS a valuable tool to monitor and assess the impacts of forest management actions to the hare and subsequently the lynx.	Comment noted. Many forests either have or are considering snowshoe hare as a Management Indicator Species.
126	19	33280	Alternative E only partially addresses the issue with discretionary guideline (Table 3-18, DEIS p. 139). This is a problem, since the DEIS indicates that current land management plans by the Forest Service and the Bureau of Land Management fail to adequately protect snowshoe hare habitat (Table 3-3, p. 113).	The Southern Rockies DEIS did not have an Alternative E. This comment pertains to the Northern Rockies DEIS. Some standards were changed to guidelines under Alternative D in the Southern Rockies to provide additional flexibility, as they do not involve the need to amend the Forest Plan if they are not implemented. As a general rule, however, guidelines are usually implemented, unless a compelling case can be made as to why a site- specific exception is warranted.
147	5	33280	After the US Fish and Wildlife Service designates critical habitat for the lynx, you should look to provide better snowshoe hare habitat. Please provide analysis on developing more and better snowshoe hare habitat.	Many of the objectives, standards and guidelines in the proposal are to benefit snowshoe hare habitat.
147	4	33280	In general, the forests of the Southern Rockies are fairly old with a fairly limited amount of young stands. Look at the inventories for the Med Bow and the A/R. and the fact is "The distribution and abundance of the lynx appears to be tied to that of the northern snowshoe hare" (p74, RM-254). If you want to manage for lynx, you need to manage for snowshoe hares. "Lynx habitat in the western mountains consists primarily of two structurally different forest types occurring at opposite ends of the stand age gradient. Lynx require early successional forests that contain high numbers of prey... Early successional forests where snowshoe hares are plentiful are the habitats that lynx favor for hunting.	Comment noted.
153	2	33280	I have some reservations about the fitness of the San Juans for lynx habitat, primarily because snowshoe populations have not seemed as strong as here as in the northern part of Colorado, e.g., Never Summer Range, North Park, Rabbit Ears, Hahn's Peak during my graduate school years (1957-1965), I spent two to three days per month early fall to June on Missionary Ridge trapping small rodents for the San Juan Ecology Project in connection with Operation Skywater (U.S. BuRec). During that period I saw very few snowshoe hares or their tracks at locations between 9000 and 11000 feet elevation. I also hunted over much of La Plata County from 1965-1992 and took several winter touring trips into the Weminuche Wilderness area and other sub-alpine situations. Snowshoe hare or their tracks were seldom seen. I did not see any hares in the	Comment noted.

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			Wilson's in the late sixties but did find white tailed jackrabbits there (also on Snowdon and Grand Turk, all in midwinter). On one trip up Endlich Mesa and across Mountain View Crest in April 1985?, I was blessed with a few inches of fresh powder atop a deep winter snowpack. During three full days I did not see a single snowshoe track in roughly 35 miles travel.	
202	2	33300	The draft EIS does not appear to be very objective and the CWGA disagrees with its single species management approach. The EIS is very expansive when listing factors that might impact lynx, regardless of lack of evidence to support hypotheses. The EIS is also very expansive when describing habitat and vegetative management and manipulation that should occur to benefit lynx (largely based on speculation). Conversely, it is interesting to note that even though vegetative manipulation throughout the Rocky Mountain Region is recommended to benefit lynx and its prey base of snowshoe hares and red squirrels, the EIS quickly sums up all of these major changes as a net positive to the Management Indicator Species as well as other threatened and endangered species in the Rocky Mountain region. Table 3-WL-7 Potential Effects to MIS Under all Action Alternatives (page 52-53) has a brief 2 page summary of the benefits of vegetative management to almost all of the 45 management Indicator Species listed in the table. The summary points out what species may benefit, but it does not list which species may not benefit from habitat manipulation. From bears to birds to frogs, everybody benefits from habitat manipulation for the lynx, which seems to be a bit of stretch without further analysis.	Comment noted. Many of the MIS were not negatively affected by the proposed standards and guidelines, but guidelines such as road closures and grazing guidelines had beneficial effects to many species.
64	76	33360	We suggest that a section on "Candidate species" be considered for an "Other Wildlife and Fish" section in Chapter 3, to provide a heads up on species that may be proposed or listed in the future and for which management direction is necessary to maintain sensitive and rare species.	Comment noted.
64	77	33360	In the list of Threatened, Endangered, and Proposed Species (page 59), EPA suggests candidate species in this section be included. Boreal toad and slender moonwort in particular should be briefly discussed.	Comment noted.
64	78	33360	In the list of Threatened, Endangered, and Proposed Species (page 59), EPA suggests deleting the whooping crane from this list in the EIS. The few occurrences of whooping cranes in or near any of Colorado's National Forests were from the experimental population in the Rocky Mountain region and the last bird from this flock disappeared in March, 2002. The population has been declared extinct.	Comment noted.
106	35	33360	The proposed lynx amendment fails to address conservation of other	Sensitive species will be covered in the Biological Evaluation,

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			individual plant and animal species that are a part of the Southern Rockies ecosystem, especially those that are rare and/or declining. For instance, the plan entirely fails to address region-wide conservation of boreal toad, northern goshawk, rare and sensitive plant species, native trout species, boreal owl, pine marten, and others. The health of populations and habitats of these plants and animals is crucial to ensuring the health and recovery of the lynx and its habitat, yet the proposed lynx amendment is silent with regards to conservation of these species.	which was not sent out with the DEIS.
193	1	33360	I did not see (maybe I missed it) any reference to wolves and possible wolf reintroduction. I think those would have a direct impact on lynx issues and should be considered.	Wolf reintroduction is beyond the scope of this analysis. Threats to lynx are addressed in the wildlife section of this analysis.
156	3	34100	I would also like to point out that the proposed amendments do not contain a desired future condition that outlines the structural stage, age class, or management strategies to move toward a desired future condition.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed.
158	6	34100	The proposed amendments do not contain a Desired Future Condition that outlines the condition, structural stage, age class, and distribution of lynx habitat or management strategies to move toward the Desired Future Condition.	The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed.
95/47, 127/47	47	34120	VEG S5. The DEIS recognizes that it remains somewhat unclear what role early-successional forests play in providing snowshoe hare habitat in the Southern Rocky Mountain Geographic Area even though it is generally accepted that they are more valuable than the mid-successional stages. We feel there could be some additional flexibility included in the standard.	Under some alternatives, VEG S5 does not apply to fuel treatment projects within WUI. There are exceptions for treatments within 200 feet of administrative sites, dwellings, or outbuildings; research studies or genetic tree tests evaluating genetically improved reforestation stock; new information that is peer reviewed and accepted by the regional/state levels of the Forest Service and FWS, where a written determination states: that a project is not likely to adversely affect lynx; or that a project is likely to have short term adverse effects on lynx or its habitat, but would result in long-term benefits to lynx and its habitat; and for conifer removal in aspen, or daylight thinning around individual aspen trees, where aspen is in decline.
231	4	34120	Efforts to maintain or enhance lynx distribution and population size in Wyoming should be focused on increasing habitat components found in early and late succession forest habitats. These include undergrowth that provides life requirements for snowshoe hares in early succession forest	Comment noted.

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			habitat, and lynx den sites in late-succession and old-growth forest. Providing these components would be beneficial in areas where those habitat components exist below the historic range of variability.	
231	5	34120	The final preferred amendment alternative should indicate that thinning of early succession forests be done in a manner that would result in shrubby undergrowth needed by hares. It should not be assumed that the term "thinning" would always have the desired effect, as there are various methods used in thinning on national forests throughout the range of the lynx and not all can be assured of producing valuable undergrowth.	On-going research will likely assist forest managers in the future to methods discussed in this comment. The best available information was considered for this analysis.
238	4	34120	There is no discussion in the DEIS about the current condition or distribution of lynx habitat or the desired condition or distribution of lynx habitat. It is currently dominated by mature and older forests. There needs to be a better discussion about whether this is desirable and how much early successional forest is needed.	Condition and distribution of lynx habitat was discussed in the DEIS Chapter 3 (pages 5-21) in the Wildlife section under "Canada lynx and lynx habitat". This information was updated for the FEIS at page 66-83.
231	6	34120	All alternatives should indicate that management of late-succession and old-growth forest should maintain or enhance the stand distribution, and of stand sizes, large snags, and down wood of the minimum size needed for den sites. This would help assure the presence of useable denning habitat, and would not assume it would be present with just the presence of a certain age of timber stand or in the presence of coarse woody debris.	The purpose is to conserve and promote the recovery of the Canada lynx. Key issues and alternative actions were considered. A cutting ban and permanently protecting all remaining old-growth spruce-fir or managing late-successional and/or old-grow forests for denning habitat exceeds what is required to conserve and promote the recovery of the Canada lynx and is in conflict with other multiple-use management objectives. See also VEG S6 under Alternative F.
226	3	34121	Management of desirable late-succession forest habitat should be promoted to enhance stand distribution, stand sizes, large snags and down wood for den sites.	
64	32	34200	If most fuel treatments are anticipated outside of lynx habitat, the proposed exemption for fuels treatment in the VEG S1 and S3 Standards would not appear to be necessary, particularly to reduce hazardous fuels in the high priority wildland-urban interface (WUI) lands.	Comment noted.
95/41; 127/41	41	34200	VEG S1. The first is that only early successional stands resulting from fires or vegetative management constitute "Lynx Habitat in an Unsuitable Condition".	See glossary for revised definition of lynx habitat in unsuitable condition.
95/39; 127/39	39	34200	VEG 01. If this objective really identifies the intent of the proposed forest plan amendments, the implications to national forest management in Colorado and southern Wyoming are much more significant than described and analyzed in the DEIS. If, on the other hand, the Forest Service doesn't really intend to implement this objective, it should be deleted.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities.
95/38; 127/38	38	34200	VEG 01. Without a full discussion of exactly what constitutes "historical	Comment noted see revised VEG01 in Alternative F

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			succession and disturbance processes", and what the necessary habitat components necessary for the conservation of lynx are, this objective is meaningless and subject to arbitrary and inconsistent interpretation on each national forest unit.	
95/37; 127/37	37	34200	ALL S1. Drop the reference to vegetation management. The term vegetation management could include activities such as prescribed burning, planting, sagebrush control, timber harvesting, precommercial and commercial thinning, and noxious weed control, none of which as been documented to be a threat to lynx movement. Don't include vegetation management with permanent structures in a standard since the effects of each are very different and vegetation management has not been identified as a threat to lynx movement.	Comment Noted: As defined in the Glossary a Vegetation management project is one that changes the composition and structure of vegetation to meet specific objectives, using such means as prescribed fire or timber harvest. For the purposes of this amendment, the term does not include removing vegetation for permanent developments like mineral operations, ski runs, roads and the like, and does not apply to fire suppression or to wildland fire use.
95/49; 127/49	49	34200	VEG S5. Lacking complete science and studies of the role that early successional stages play on hare densities, what different stand densities can provide for hare habitat, and lack of understanding of a landscape perspective that early stages play, the Lynx Science Team has apparently taken the conservative approach and simply recommended that no thinning should occur. This Standard should provide flexibility to apply different approaches to thinning that can still provide for hare habitat and provide for tree growth.	Comment noted See revised VEG S5 in Alternative F
95/46; 127/46	46	34200	VEG S5. Rather than an either-or approach of no thinning or no hare habitat, we feel that some flexibility would be more beneficial to our interests while still providing for the long-term conservation of lynx habitat.	Comment noted See revised VEG S5 in Alternative F
117	3	34200	To incorporate management flexibility to address forest health when managing lynx habitat or to strengthen it, I am proposing the following additions to Alternative D: VEG 05. Implement vegetation management activities to accomplish forest health objectives over the long term.	VEG S5 provides some flexibility for fuels projects within WUI as well as exceptions. The EIS provides a range of alternatives that provide a basis for decision making.
117	4	34200	To incorporate management flexibility to address forest health when managing lynx habitat or to strengthen it, I am proposing the following additions to Alternative D: VEG S1. (This standard is currently in conflict with long term forest health issues). Add to the list: 4. Vegetative management practices that maintain forest health and maintain or improve lynx habitat over the long term.	VEG S1 provides some flexibility. The EIS provides a range of alternatives that provide a basis for decision making. Forest health issues are dependent on management objectives. The decision maker will determine trade-offs where forest health objectives may be reduced for some resources.
117	6	34200	To incorporate management flexibility to address forest health when managing lynx habitat or to strengthen it, I am proposing the following additions to Alternative D: VEG G6. Add: Apply vegetation management to maintain or increase the young aspen component to improve lynx prey habitat.	Guidelines are less restrictive than standards and allow flexibility to incorporate options that would better meet relevant management objectives.

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126	2	34200	We urge the Forest Service to select a strengthened Alternative B, modified as follows: Standards VEG S5 and VEG S6 are expanded from pre-commercial thinning to include all vegetative management projects that reduce winter snowshoe hare habitat, as described in Alternative C.	Comment noted. Alternative B reflects the Lynx Conservation Assessment and Strategy, which was intentionally conservative to maximize protection of lynx habitat. The EIS provides a range of alternatives that provide a basis for decision making.
126	13	34200	The [FS] simply drops standard [VEG S2] in the proposed action (Alternative B). This standard prevents conversion of more than 15% of lynx habitat within a [LAU] to an unsuitable condition within a ten-year period. The Forest Service fails to justify dropping this standard in its preferred alternative, besides one statement in the DEIS.	Comment noted. A wide range of alternatives was considered. Alternative B provides direction within VEG S2. Alternatives C and D provides direction within guideline VEG G7. Alternative F provides direction within VEG S2. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
149	23	34200	VEG S5. This standard is saddled with both the Fire Use and fuel treatments exceptions. The standard does not apply to "[I]llicit livestock grazing practices and activities." DEIS at S-8. Unfortunately, despite the FS' dismissal of livestock grazing as an activity that can harm lynx and lynx habitat, the Lynx Science Report documents at length the potential impacts of such grazing, and the management recommendations in the LCAS reflect this. See for example LCAS at pp. 27-28, 58, 85.	The effects to lynx from grazing is discussed in the analysis.
149	21	34200	VEG S3. This standard is saddled with both the Fire Use and fuel treatments exceptions. All of the problems identified for the exceptions in ALL S1 hold for ALL S2 as well: the FS fails to provide any biological basis for this exception, any clear estimate of or parameters on the frequency with which it will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of its use. Without extensive analysis of these considerations, and the inclusion of biologically defensible parameters on its use, the FS cannot include these exceptions in the lynx amendment.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities.
149	20	34200	VEG S2. This standard (with the non-discretionary word "shall") is replaced with a guideline, VEG G7 (with the extremely discretionary word "should"), making it ever easier for the FS to choose to suspend this protective provision. This effectively makes the provision discretionary. Consequently, the FS cannot assume, in its analysis of impacts to lynx, that this provision will be enforced.	Comment noted See revised VEG S2 in Alternative F
149	19	34200	VEG S1. This standard is saddled with both the Fire Use and fuel treatments exceptions. This standard, like ALL S2, is not intended to protect lynx but rather to make it easier for the FS to approve activities, in lynx habitat, known to be harmful to lynx. In short, this standard would	The best available information was considered in the analysis. The combining LAUs was noted to account for smaller LAUs. The effects to lynx are analyzed in Chapter 3.

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			allow the FS to conduct the required analysis (establishing a limit on the amount of unsuitable lynx habitat permitted within each LAU) and, if the results were unfavorable to the proposed land use, try the analysis again "in combination with immediately adjacent LAUs on NFS lands." DEIS at S-6. In other words, if the analysis doesn't reproduce the desired result, VEG S1 allows the FS to try again using different combinations of LAUs. There is no biological basis for this standard and it stands in contrast to the recommendations of the LCAS. Moreover, the FS fails to clearly assess the implications: how often will different combinations of LAUs be used to circumvent the habitat protection standard, and what will the habitat effects be?	
149	22	34200	VEG S4. This standard (with the non-discretionary words "may not occur") is replaced with a guideline, VEG G8 (with the extremely discretionary words "should not occur"), making it ever easier for the FS to choose to suspend this protective provision. This effectively makes the provision discretionary. Consequently, the FS cannot assume, in its analysis of impacts to lynx, that this provision will be enforced.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities. A standard is a required action in a land management plan specifying how to achieve an objective or under what circumstances to refrain from taking action. A plan must be amended to deviate from a standard. A guideline is a particular management action that should be used to meet an objective found in a land management plan. The rationale for deviations may be documented, but amending the plan is not required.
149	26	34200	VEG S5. An additional problem with this standard [VEG S5] is found in the list of conditions under which vegetation management practices are permitted. The standard allows such activities in "[s]tands identified as 'replacement' or 'future' lodgepole old growth in the Forest Plan." DEIS at S-8. However, the small young conifers that would be removed under this provision would be better left alone to serve as hare foraging areas. This standard is ironic given that the little old growth lodgepole that remains has been and is being lost to logging.	Comment noted See revised VEG S5 and VEG S6 in Alternative F
149	27	34200	VEG S6. This standard (with the non-discretionary word "shall") is replaced with a guideline, VEG G6 (with the extremely discretionary word "should"), making it ever easier for the FS to choose to suspend this protective provision. This effectively makes the provision discretionary. The FS cannot assume, in its analysis of impacts to lynx, that this provision will be enforced.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities. A standard is a required action in a land management plan specifying how to achieve an objective or under what circumstances to refrain from taking action. A plan must be amended to deviate from a standard. A guideline is a particular management action that should be used to meet an objective found in a land management plan.

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				The rationale for deviations may be documented, but amending the plan is not required
150	19	34200	Does the CDOW reintroduction data, and recent lynx reproduction data, tend to support or disprove the determination in Vegetation Standard 3 for Alternatives B, C, and D, DEIS at S-6, that denning habitat within a Lynx Analysis Unit ("LAU") is unsuitable for lynx denning and reproduction if denning habitat constitutes less than 10% of an LAU or exists in patches less than 5 acres? Have any reintroduced lynx reproduced in such LAUs?	The best available information was reviewed and considered. Consultation with the FWS to ensure adequate regulatory mechanisms would be in place. Alternative F combined all the denning habitat direction into one guideline.
165	2	34200	There is no reason for thinning in an area remote enough for Lynx recovery. Thinning should be confined to areas near communities and developments without new roads being built. With modern thinning strategies road building would badly fragment suitable habitat for Lynx recovery.	Thinning for fuels reduction in WUI would not anticipated restricted. Thinning is an appropriate silvicultural tool on lands identified as suitable for timber production. Amendment direction would limit precommercial thinning activities as noted in the Forest Resources analysis in Chapter 3.
204	3	34200	Vegetation Management Activities and Practices: VEG S1 - Change 30% to 20%; VEG S2 - Change 15% to 20%; VEG S3 - Change 'larger than 5 acres' to 'larger than 5 contiguous acres contained within an LAU tract'; VEG G5 - Change 'permitted ski area' to currently zoned or permitted ski area; VEG G6 - Delete in its entirety; VEG G7 - Change 15% to 40%; VEG G8 - Change '5 acres' to '5 cumulative acres within any one LAU'.	Suggestions noted. Alternative F was developed to address some of the comments on the DEIS and SDEIS, and ensure adequate regulatory mechanisms would be in place.
216	4	34200	Specifically, vegetation management standards VEG S5 and ALL S2 lack merit and in the USFS R2's own analysis "may lead to adverse effects" on lynx productivity, prey base, and landscape connectivity.	Alternative F was developed to address some of the comments on the DEIS and SDEIS, and ensure adequate regulatory mechanisms would be in place. ALL S2 is a part of Alternative D, but is not included in other action alternatives.
231	10	34200	The amendment must necessarily consider management at a large scale, given the amendment area, the size of individual lynx home ranges, and the area needed for a viable lynx population. The final preferred alternative should plan for those components to be present in a well-distributed manner across the landscape of multiple LAUs, with a focus on providing habitat where the most potential exists, regardless of LAU boundary. This would add flexibility to land management as well as allow the best chance of improving the best potential lynx habitat.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities.
231	3	34200	While achieving actual significant benefits for lynx may well prove to be problematic, we believe the greatest potential for benefits will result from forest habitat management. The vast majority of forested habitat in Wyoming is located on U.S. Forest Service lands. This amendment, with its forest management component, provides the most viable approach in trying to achieve those benefits.	Comment noted.

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238	12	34200	We are very concerned about the restrictive nature of standard VEG S5, regarding precommercial thinning. VEG G1 the concept behind this Guideline is on target, i.e., encourage management to increase the habitat conditions necessary for lynx. But the Forest Service has undermined the concept by making it a Guideline, which means the Forest Service will not take it seriously.	Comment noted. See revised VEG S5 and VEG S6 in Alternative F. A standard is a required action in a land management plan specifying how to achieve an objective or under what circumstances to refrain from taking action. A plan must be amended to deviate from a standard. A guideline is a particular management action that should be used to meet an objective found in a land management plan. The rationale for deviations may be documented, but amending the plan is not required
246	46	34200	Standard VEG S4. Standard VEG S4. [The DOI] support[s] VEG S4 Conditions 1,2,3, and 4 under Alternatives B and C. However, the defensible fuels profiles language should be deleted from exemption in Alternative C. The defensible fuels profiles language is too vague, and could be applied to any vegetation management action, anywhere on a forest, and at any time. The Department [of the Interior] recommends that the Forest Service clearly define the parameters under which this exemption would be applied.	Comment Noted. The alternatives were developed to display a range of potential management actions. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat.
211/22; 246/50	50	34200	Standard VEG S6: The following paragraph is language that has been accepted by the Lynx/Wolverine Steering Committee to address management of late successional forest types that are important for lynx. Based on current research, the Department recommends developing an objective with corresponding standards and guidelines that include the following language: "Provide habitat conditions through time that support dense horizontal, understory cover, and high densities of snowshoe hares. This includes, for example, mature, multi-storied conifer vegetation in the west. Focus vegetation management, including timber harvest and use of prescribed fire, in areas that have potential to improve snowshoe hare habitat (dense horizontal cover) but that presently have poorly developed understories that have little value to snowshoe hares."	Comment noted.
2	14	40000	Regarding lynx protections and recovery, please consider the following: Prohibit the development of any new roads/trails in lynx habitat.	Comment noted.
64	43	40000	Monitoring areas with differing road densities and differing road mortality could be conducted to determine adequate and ideal maximum road densities and characteristics.	Comment noted.
64	42	40000	Additional Standards could include: minimize new USFS roads; seek opportunities to close and obliterate roads when no longer needed/on project completion; maintain a maximum road width and right of way of X feet; maintain vegetation within X distance of the roadway; maintain sight	All S1, All G1, and LINK S1 provide for the consideration, protection and mitigation of actions relating to Lynx habitat.

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			distances; avoid roadside barriers to the extent possible (e.g. retaining walls). Even if no definitive road-density standards have been identified, some Standard could be proposed to promote lynx conservation and recovery.	
64	45	40000	Please address the science regarding road density in the Final EIS. A road density standard that protects other game and non-game wildlife may be instructive for the needs of lynx, in the absence of definitive analysis of the lynx's needs.	Road densities are identified by forest units in their respective land management plans. This amendment addresses this concern within the measures listed for Human uses management activities and practices.
64	44	40000	Fewer roads in and into lynx habitat are likely to reduce the many effects that roads have on lynx and other wildlife.	All S1, All G1, and LINK S1 provide for the consideration, protection and mitigation of actions relating to Lynx habitat.
109	6	40000	Your restrictions on transportation in this DEIS are not even subtle and they are not at all reasonable. The effect on transportation management alone is enough justification to shelve this DEIS. Page 137 lists highway routes impacted which include I-70, 8 US highways and 14 State highways. The indirect effects of implementation regarding transporting are, "Effects would be mainly on traveling public, especially if improvements for safety and capacity are constrained." My interpretation of that is - if I-70 is improved for safety it will be in violation of this DEIS. The cumulative effects, again page 189, are "would only affect new road construction/reconstruction, changes in use of existing roads, roadside maintenance." What other transportation management is there? Who else is there to be affected besides the "traveling public"? This DEIS will affect transportation management in Colorado and may actually put a halt to it entirely. That is not the proper role of the US Forest Service. You must stop this nonsense.	The indirect effects pertain mostly to the public traveling on low speed, low volume roads and not to high volume/high speed roads. HUG8 Road management considerations include the providing for public safety while minimizing impacts to lynx. Link S1 require FHWA and DOT's to identify/evaluate and mitigate wildlife crossing and linkage areas.
126	73	40000	Though lynx research has not yet defined a specific "threshold" road density for lynx habitat, it is clear that the fewer roads into lynx habitat the better. Where lynx habitat overlaps with grizzly bear habitat or important habitat for elk, FWS should urge hasty progress toward ensuring that road density standards to protect those species is made.	Road densities are identified by forest units in their respective land management plans. This amendment addresses this concern within the measures listed for Human uses management activities and practices.
126	72	40000	The impacts of road include: roads increase access for hunters and trappers, destroy habitat for prey and disrupt lynx travel and hunting patterns, direct loss of habitat, indirect loss of habitat by avoidance of human activity, greater accessibility to the legal trapper or hunter, greater vulnerability to poaching...opportunities for illegal take will increase, and impacts from traffic include snowmobile use in the winter.	Comment noted. These impacts were discussed in Chapter 3 in the wildlife affected environment section.
126	68	40000	Although roads in and of themselves may not harm lynx-in fact, lynx may use them as for easy travel routes, and even benefit from foraging habitat	Comment noted.

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			along the roadsides-the associated human access typically overrides any positive or neutral aspects of roads into lynx habitat.	
126	63	40000	The LCAS and amendment fail to include road density standards that are needed to protect lynx habitat security. Road densities in all areas important to lynx should not exceed one mile of open road per square mile of habitat, and unroaded areas should remain that way.	Road densities are identified by forest units in their respective land management plans. This amendment addresses this concern within the measures listed for Human uses management activities and practices.
150	23	40000	The Fish and Wildlife Service has determined that there is "no evidence that some activities, such as forest roads, pose a threat to lynx". This finding should be incorporated into the DEIS.	Comment noted.
235	41	40000	In as much as one of the greatest threats to lynx in Colorado since the reintroduction began are accidents between lynx and motor vehicles, Colorado's Department of Transportation takes lynx conservation very seriously in construction and reconstruction planning and funding. Many of the considerations under LINK S1 regarding wildlife crossings and linkages areas have been brought forth in Environmental Impact Statements and Environmental Assessments for the various projects.	Comment noted.
64	38	40100	Roads that fragment lynx habitat or impair connectivity of habitats should be avoided. The HU G6 Guideline changed its emphasis from avoiding to mitigating upgrading roads where upgrades would lead to substantial increases in traffic volumes or speeds.	Comment noted. ALL S1, HU G6 and HU G7 provide direction to maintain habitat connectivity.
126	60	40100	The LCAS and amendment fail to protect lynx from the harmful effects of forest roads year-round. Logging roads should be minimized and kept as primitive as possible and should be closed and obliterated immediately after use.	HU G6, HU G7 and HU G9 provide direction to reduce potential adverse impacts from roads.
237	2	40100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: Lynx BC03M09 appears to be near the long draw Reservoir road. This road is accessed via snowmobile by DWR for a snow course.	HUS3 Winter access for non-recreation special uses shall be limited to designated routes or designated over-snow routes. In other words, access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
237	3	40100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: At some point Water Supply and Storage Co. plows their way in to Long Draw Reservoir and begins plowing open the Grand River Ditch itself. After the road is open we activate our DCP gages below Long Draw Reservoir and on Grand River Ditch.	
126	55	40200	The LCAS directs FS and BLM: "Within the range of lynx, complete a	Project specific biological assessments are completed for

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			biological assessment for all proposed highway projects on federal lands" (p. 90). There is no mention of this in the proposed amendment, and again this is an important omission because of the fragmentation effects on lynx populations from highways across the region.	proposed projects affecting National Forest System lands.
64	40	40300	Please respond to concerns about whether new roads and reconstruction should be minimized. This minimization includes assessing appropriate levels of service and not encouraging greater speeds and volumes.	The Roads Management Policy along with the site-specific Roads Analysis Process require an interdisciplinary process be used to analyze the existing road system to ensure that the minimum road system managed at the appropriate levels of service be identified.
79	3	40300	This document states that "the impact on the road system would be relatively minor. I believe this statement needs to be changed. Increasing the cost of a highway project by several million dollars to erect bridges rather than cut and fill takes resources that could be used to improve/maintain/build other highways. This could potentially have a fairly large impact on the highway system.	Comment noted. The transportation section noted there would be some additional time and cost to evaluate and implement road features and locations to avoid or reduce effects on lynx and lynx habitat. Due to limited resources at all levels, this could potentially have an impact on highway system projects.
207	3	40300	This document states that "the impact on the road system would be relatively minor. I believe this statement needs to be changed. Increasing the cost of a highway project by several million dollars to erect bridges rather than cut and fill takes resources that could be used to improve/maintain/build other highways. This could potentially have a fairly large impact on the highway system.	
149	32	40400	HU G6. This provision is inexplicably and indefensibly weakened from "avoid upgrading unpaved roads" to "methods to avoid or reduce effects should be used."	Comment noted. ALL S1, HU G6 and HU G7 provide direction to maintain habitat connectivity.
235	32	42000	The Colorado Division of Water Resources has expressed concern about any limitations which may be put on the Division to access snow survey sites, gauging stations, and dams due to snow compaction limitations.	HUS3 Winter access for non-recreation special uses shall be limited to designated routes or designated over-snow routes. In other words, access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
237	1	42100	Our concerns are related to winter access to our snow survey sites, gaging stations, and dams via snowmobile as it relates to snow compaction. We primarily use Forest Service roads to gain access as much as possible, but the need does arise to break trail. In general, our concerns would pertain to any snow survey site, gaging station, or dam in the areas of concern.	
134	3	43000	By allowing more trails, people will continue to create more on their own and this in turn will cause more deaths of lynx by mobiles.	Comment noted.
20	5	45000	The economic impact on the area to reduce the winter and summer recreation in Creede, South Fork, Lake City, and Pagosa Springs would	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season.

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			hurt an already bad economy.	Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
77	10	45000	The DEIS should read, for instance, "The proposed amendment will negatively impact human uses of the forest by limiting winter recreation..." There is a finite amount of area in which people are allowed to recreate. The restrictions on human use set forth in the DEIS will, as a matter of certain fact, further restrict this recreation.	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated.
117	21	45000	"Chapter 3 Recreation Section": Please rewrite this section and display the effects of the proposed Standards and Guidelines as is done in the other resource sections in order to provide a consistent effects display to help the public and Decision Maker determine which individual Standards and Guidelines cause effects.	Comment noted. This information is summarized in Table 2-3 to display the comparison of effects of the amendment direction.
118	5	45000	The economic impact on the area to reduce the winter and summer recreation in Creede, South Fork, Lake City, and Pagosa Springs would hurt an already bad economy.	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
136	3	45000	I'm not convinced that further regulating human use of the forests during the winter is essential. My understanding is that snowshoe hare and lynx are concentrated in dense spruce-fir forests on north facing slopes where there is normally minimal human activity in winter because of thick forests, deep snow and cold temperatures. The exception to my generalization would be ski resorts, which are exempted from restrictions in HU S1	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
204	7	45000	Recreational enjoyment must not be hindered by the overzealous few who are dedicated to obstruct the pursuit of enjoyment by a greater number of citizens, be it: foot travel, snow sports, climbing, water sports, or responsible use of mechanized transportation.	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an
239	9	45000	I have formed the opinion that the evidence for groomed trails creating a situation where other predators are significantly competing is not definitive and not 'hard science' at this point. There are apparently two multiyear studies being conducted, one in Utah and one in Montana, to try to explore this competition extent and impact but both are still underway and unpublished. Currently one shows some support for this hypothesis and one does not. There may be complicating factors, such as different predator behavior and prey availability in these two locations. Also there	

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			<p>may be a relationship between drought (i.e. reduced snowpack) and greater elevation range for these other predators. There also may be complicating factors in areas like ski resorts where there might be readily available human sources of food (e.g. trash) that attract and support these other predators. There are other lines of evidence of trail impacts to lynx in terms of habitat fragmentation, as well as the impact of groomed trails on other rare species like wolverine.</p>	<p>opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005). In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx. The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level. If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the</p>

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				guideline would be followed; and if not then the guideline need not be followed.
16	2	45100	Outdoor enthusiasts and backcountry users like myself should be on top of the endangered species list. Every time you turn around another road or trail has been closed to motorized travel or another area closed to snowmobiles. Where will it end? It needs to end here, no more road closures, no more restrictions on logging, and no more wilderness areas! Enough is enough. Our right to enjoy the outdoors should not be infringed by the lynx or any other animal that might be introduced.	Comment noted.
141	3	45100	Here is the real point, some restrictions as proposed would really have a negative effect on responsible forest management and recreational use, including summer and winter trail use. A significant part of the economy of the Creede/Southfork area depends on attracting visitors to the area, which (in turn) is dependent on responsible recreational use of public forest lands.	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
77	15	45300	As the DEIS notes, the various snowmobile organizations are predominately responsible for the existing number of groomed and marked trails, which are used by motorized and non-motorized recreationists alike. DEIS at 3-112 - 3-113. This fact must remain foremost in the collective mind of the agency when certain incorrigible elements of the non-motorized contingent complain about "the sound and smell of snow machines." Non-motorized recreationists are permitted to use nearly all of the areas open to motor vehicles, while the percentage of the public lands closed to motorized use increases all the while. Therefore, these hollow complaints should be taken in context and the complainants directed to the nearest non-motorized area, which cannot be all that far away. After all, a rational man does not seek solitude on the freeway.	Comment noted.
5	2	46000	Why are lynx being introduced in recreational areas? Around snowmobile staging and riding areas, e.g., near Creede, Colorado? Do the perpetrators of Lynx Introduction wish to deny, in a back-handed way, motorized recreation and hunting and horse riding and most any other activity on public lands to the American Public, whom the land management agencies are bound to serve?	The reintroduction of lynx is outside the scope of this analysis. This amendment is to ensure adequate regulatory mechanisms are in place for providing for lynx habitat while allowing multiple use management.
66	4	46000	It appears to be extremely irresponsible to place significant recreational (and therefore economic) activities of human beings (snowmobiling in particular) at risk by the introduction of a species that has little, if any, chance of long term survival in this area (as opposed to other areas from which it would be transplanted and where it has thrived without human	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the

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			interference).	analysis areas are not expected.
235	30	46000	While much pressure remains to limit snow compaction activities in the fear of increasing prey competition, Colorado prefers that no action be taken on the issue of snow compaction until the Service has the results of two studies being conducted on this issue in Montana and Utah.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
235	31	46000	Colorado will not commit to any alternative standard or guideline (HU S1 or HU G10) which has snow compaction as its underlying rationale for restrictions until more and better science is available.	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).
239	12	46000	I would suggest any new groomed trails are overlaid on lynx habitat, and evaluated before any applications for designation are made.	In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell
77	6	46100	No legal authority (not even the Endangered Species Act, or ESA) allows the Forest Service, or any other federal agency, to remove or otherwise fail to provide motorized recreation opportunities, where they are otherwise appropriate, based on mere hypothetical "impact" to forest resources that "may" occur. All uses have "impact." The Forest Service must instead use a science-based approach to determine where the amount of impact from a particular use rises to the level of irreparable harm to irreplaceable forest resources. The DEIS reflects a dearth of this quantitative, scientific approach, and therefore must be extensively revised prior to any decision.	
2	13	46100	Regarding lynx protections and recovery, please consider the following: Eliminate ORV and snowmobile travel in lynx habitat as much as possible.	
115	1	46100	I believe that mechanized recreation use on NFs is counterproductive to many NF resources values especially wildlife values like the lynx. While some mechanized use has already become established and permitted, the more we find out about the negative impacts on vegetative and wildlife values the more certain I am that this type of use is anathema to the lynx and other natural forest relationships. The compaction of snow over vegetative cover, loss of light and air exchange, later snow melt, the exclusion of lynx prey from the tracts, disadvantage to the hare when pursued by lynx, and the disruption of cross country ski travel are all negative impacts caused by snowmobiles not to mention their exhaust (air quality and noise) which affects both wildlife and human use.	
148	2	46100	LCAS has shown that snowmobile activity is clearly detrimental to lynx because of disruption of lynx habitat use, increased mortality and by encouraging encroachment by competing coyotes into critical lynx habitat. Neither have USFS assurances that ORV trespass can be effectively	

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			contained proved valid.	
165	1	46100	There is absolutely no reason to allow increased snowmobile or ORV traffic in any areas designated for Lynx recovery. I have seen firsthand the destruction that these vehicles can do in both Yellowstone National Park and in my own state of Colorado. One has to look no further than Jones Park or Frosty Park on the Pikes Peak massive to understand the destructiveness of these machines. They do not belong in our national forests anyway, and most certainly not in a Lynx recovery area.	(2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.
121	5	46110	Other than winter recreation, the EIS does not reference any other recreation activities. The EIS does reference grazing, which takes place during the summer months as does the greatest percent of USFS land recreation. Why has the EIS chosen to single out grazing while blatantly ignoring any level of summer recreation? This is only an example of the misguided efforts and focus of this EIS.	The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.
20	4	46120	Snowmobile trails are only a fraction of 1% of the total forest area.	
21	2	46120	Limit snowmobiles by adding more regulations to HU S1.	If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.
39	2	46120	According to Sled City, we have 2,500 miles of groomed trails in Colorado; 5,280 lineal feet in one mile; using an average width of 12 feet for the trails; divide by 43,560 the square footage in an acre and you have 3636.36 acres total of snowmobile trails in the state. This is the equivalent of 5.6859 square miles or 1616.16 square blocks (using the engineering value of 100,000 square feet in a typical city block). This is such a small percentage of the national forests. There is a lot of area left for the lynx to inhabit without the concern of compacted trails. Please do not restrict our forests because of the small area we use for snowmobiles.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
42	2	46120	According to the Forest Service, there are 15,333,176 acres of national forests in Colorado of which 3,125,918 acres are designated wilderness areas. That leaves 12,207,258 acres. According to Sled City (Colorado Snowmobile organization) there are 2500 miles of groomed trails in Colorado. With an average width of 12ft/trail, groomed trails comprise only 3636 acres. Groomed trails only account for .003% of the total area of Colorado forests, not including wilderness areas. There is a lot of area left for the lynx to inhabit without the concern of compacted trails. Please do	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research

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			not restrict our forests because of the small area that we use for snowmobiles.	has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging.
64	69	46120	The DEIS does not address areas whether existing snowmobile use harms lynx. If there are known impacts from existing uses, the final EIS should address whether that use should be restricted or modified.	Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompact roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).
64	68	46120	Maintaining use on designated snowmobile routes and restricting snowmobile use in LAUs where harmful impacts are likely to occur can minimize new lynx threats. Snowmobiles were identified as a potential threat to lynx because they allow competitors access into lynx habitat and because of direct disturbance. The DEIS does not address dispersed snowmobile use and its potential impacts to lynx and lynx habitats. In some areas such dispersed use could be more significant than designated routes and play areas.	In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.
71	4	46120	Strengthen Standard HU S1 in Alternative B so that there is no net increase in snowmobile routes inside or outside of "baseline areas".	The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.
78	5	46120	For the benefit of the lynx, other forest wildlife and the citizens of Colorado and Wyoming who value their natural surroundings, I urge the Regional Forester to adopt Alternative B with the following change: Amend Standard HU S1 to state that there will be no net increase in snowmobile routes inside and outside of baseline areas to ensure that there is no increase in snowmobile impacts on the lynx and snowshoe hare.	If it is found that lynx and coyotes are competing in a
80	3	46120	Regarding HV SI-alt B, please don't allow any net increase in snowmobile routes inside or outside the baseline areas to protect lynx from snowmobile traffic.	
87	4	46120	HU S1: This non-discretionary standard ("allow no net increase") is changed to a discretionary guideline (HUG10). The FS has no credible biological basis for relaxing this provision. The FS also fails to provide a clear estimate of the frequency with which this provision will not be applied (since it is a guideline, its application is discretionary), any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use. Moreover, this standard must be strengthened to limit snowmobile routes or play areas in lynx habitat whether they are "designed" or not, and to actively reduce snowmobile routes and play areas where they are not known to be compatible with lynx restoration. The numerous exceptions detailed in the DEIS should be eliminated. As noted, the preferred alternative represents a remarkable departure from the best available science (e.g., the Lynx Science Report) and the recommendations of lynx biologists responsible for LCAS with	

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			respect to snowmobiles in winter. For these reasons, we think the Forest Service should reconsider its preferred alternative and follow best available science by putting in appropriate protections for the lynx. These must include a limitation on new snowmobile routes which provide compacted routes for competing species. New research by Kevin Bunnell at Utah State University at Logan (in press) shows that coyotes were easily able to access snow covered areas via any snowmobile trails, not just groomed ones. Scientists believe that coyotes likely compete with lynx for prey. See, e.g., Buskirk et al, 1999.	particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.
118	4	46120	Snowmobile trails are only a fraction of 1% of the total forest area.	
126	44	46120	We disagree with the Forest Service claim that these alternatives "should not result in more compacted snow since expansion would be into areas already compacted as established in the baseline" (DEIS, p.211). Increased grooming will increase the speed, efficiency, and volume of snowmobile traffic on these routes, each of which is certain to result in increased areas of snow compaction from the many users who will disperse from the groomed routes.	
126	43	46120	This analysis demonstrates that none of the alternatives will effectively address the potential threats to lynx from snowmobiles, since all of the alternatives allow continued expansion of snowmobile use within designated areas, and none of the alternatives manage dispersed snowmobile use outside of these areas. Alternative B allows and additional 3,500 miles of snowmobile trails to be groomed in lynx habitat; and Alternatives C, D, and E would allow countless miles of additional groomed routes within "areas of consistent snow compaction."	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
126	39	46120	The Forest Service inappropriately cites an unrelated scientific study of the effects of snowmobiles on elk and wolves (Creel et al. 2003) as the basis for its assertion that a survey of two ski areas in Canada indicated that they did not seem to displace lynx.	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored
126	74	46120	Snowmobiles should be restricted in all areas where they pose a threat to lynx due to disturbance and/or allowing competitors access into lynx habitat. It is not enough just to cap existing use of designate routes and play areas.	
126	75	46120	The proposed standard does not address dispersed use, which affects a far larger area of lynx habitat than designated routes. The proposed standard does not address snowmobile use in areas where existing levels are already harmful to lynx. Since disburused use can be difficult to restrict, we urge the FS and BLM to confine all snowmobile use in lynx habitat to	

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			designated routes and play areas, as is now the case for off-highway wheeled vehicles. Each of these routes and play areas should then be analyzed to ensure that they do not adversely affect lynx, either by degrading habitat security from people and activity or by allowing lynx competitors access into lynx habitat otherwise inaccessible to them (via snow compaction). Expanding regulations that address motorized access to include snowmobiles will benefit many other species besides lynx, by restoring and maintaining secure winter and early spring habitat for grizzly bears, wolverines, fishers, moose, elk, deer and many other species.	over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).
126	3	46120	We urge the Forest Service to select a strengthened Alternative B, modified as follows: Standard HU S1 is strengthened to limit snowmobiles in lynx habitat to designated routes and plays areas only, to allow no net increase in snowmobile routes or play areas in lynx habitat whether they are "designated" or not (unless it serves to consolidate use), and to actively reduce snowmobile routes and play areas where they are not known to be compatible with lynx restoration.	In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.
126	17	46120	The Forest Service states there is a concern that protecting lynx habitat may harm snowmobiling and other forms of winter recreation. Yet, its own analysis finds no significant increased cost to recreation between Alternatives B and E.	The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations.
149	29	46120	HU S1. This non-discretionary standard ("allow no net increase") is changed to a discretionary guideline (HU G10). The FS has no credible biological basis for relaxing this provision. The FS also fails to provide a clear estimate of the frequency with which this provision will be violated, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use. This standard must be strengthened to limit snowmobiles in lynx habitat to designated routes and play areas only, to allow no net increase in snowmobile routes or play areas in lynx habitat whether they are "designated" or not, and to actively reduce snowmobile routes and play areas where they are not known to be compatible with lynx restoration. The numerous exceptions detailed in the DEIS should be eliminated.	In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level.
150	17	46120	What CDOW reintroduction data support the hypothesis (rejected by the United States Fish and Wildlife Service in 2003) that winter recreation is a threat to lynx because snow compaction allows lynx competitors such as bobcats and coyotes to access lynx habitat and harm lynx? The unproven snow compaction hypothesis underlies Human Use Objective 1 in all action alternatives, DEIS at S-12, the no-net increase in snow compaction	If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.

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			requirement of Human Use Standard 1 for Alternatives B and C, DEIS at S-12, and pages of snow compaction hypothesizing. E.g., DEIS at 2-33, 2-43, 3-17, 3-18, 3-20, 3-41.	
153	3	46120	I strongly support the restriction of new snowmobile trails and urge closing many existing trails that encroach on the periphery of remaining roadless tracts. During my experiences on Missionary Ridge I observed coyotes regularly traveling these paths throughout the winter. Occasionally they would venture off into the deep, unpacked snow off the snowmobile track, usually to reach an elk hide or carcass but sometimes to reach a ridge and travel farther a field. The tracks allowed the coyotes to range deep into the snow-covered landscape into areas that they probably could never reach until the spring thaw and nightly freezes put a crust on the snow. I fear the snowmobilers also may impact the lynx detrimentally.	
150	35	46120	The Forest Service has given improper weight to the snow compaction hypothesis by making it the basis of proposed management direction, including Human Use Objective 1, Human Use Standard 1, and Human Use Guideline 10. Those management directives should either be deleted entirely or recast as subjects for future study. The Forest Service should give the snow compaction hypothesis no weight in selecting between alternatives.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003).
159	6	46120	When the lynx were first re-introduced several years ago, there was at least one lynx that inhabited an area called Prospect Basin. Then Prospect Basin was developed as an addition to the Telluride Ski Area. The lynx were driven out and have not returned. The increasing snowmobile use might do the same over much of the Lizard Head Pass area. Even when restricted to approved and maintained trails, snowmobiles can push bison, wolves, elk, moose and bald eagles out of their "preferred habits". I am sure this would apply to the lynx. Snowmobilers almost always run in packs and the noise they make is ear splitting.	The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random
168	8	46120	Allow us to reiterate BRC's comments sent to the agency in 2001: Snow is an infinitely variable surface. It can be deep and powdery, powder with a base, set up, set up and hard packed, slushy, icy, and many more combinations. All of these snow surface conditions can change throughout a day, by elevation, by weather, and throughout the season. It is ludicrous to assume that the presence of absence of man-made tracks (in very limited locations compared to the total landscape) affects this surface to any degree. The FS should develop and adopt an alternative that drops all direction limiting snow compaction.	

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191	3	46120	"HU S1" should be altered so that there is no rise in snowmobiles inside or outside of baseline areas. Lynx need to be protected from stress and harrassment from snowmobiles.	chance. However, coyotes used compacted snowmobile trails for less than 8 percent or their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).
229	5	46120	Please insure that there is not net increase in snowmobile routes inside or outside baseline areas to protect lynx from the extremely detrimental effects of snowmobiles.	In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx. The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level. If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.
126	25	46120	Inadequate disclosure of information: Maps needed of "areas of consistent snow compaction": The Forest Service states that "Areas of consistent snow compaction... will be determined based on the area or miles used in 1998, 1999, or 2000" (DEIS, p. 29). The Forest Service is obliged to	The baseline snow compaction information includes snowmobile trails (designated and groomed trails) and known "play" areas where concentrated snowmobile use had been observed. Information from the affected forests for the years

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			explain the methodology used to monitor and map this use, and to provide these maps to the public, since there are necessary for us to understand and evaluate the effects of this revision.	
153	4	46120	I strongly support the restriction of new snowmobile trails and urge closing many existing trails that encroach on the periphery of remaining roadless tracts. Some snowmobilers are also sheep ranchers and others powerfully biased against the reintroduction of lynx.	
239	7	46120	Question of whether the "groomed" snowmobile trails are "designated" or not. From talking with Dave Hause I have established that the USFS has been signing off on the grooming contracts every year, but Dave's understanding was that the trails are not necessarily USFS designated trails. Dave said it has been the responsibility of the snowmobile groups to apply for designation of these trails, and they have not reported back to him about this. The GIS data from the USFS does not currently show many of these trails, which might indicate they aren't designated, but we did not have time to look for other published maps. One of the USFS biologists I talked to was fairly confident that any trail that is being groomed should be a designated trail, but the USFWS biologist made a somewhat vague statement about 'existing' versus 'designated' trails. Because of this, I verbally confirmed with Lois Poppert of USFS on 4/22/04 that groomed trails, even if not designated, would still be allowed to exist under alternatives B, C and D. The EIS amendment does refer to "groomed or designated trails" rather than "groomed and designated trails", which would indicate they will be treated the same.	1998-2000 was used and discussed in the Recreation analysis.
239	5	46120	Question of what date will be used to consider what is an existing trail: One caveat to this understanding is the question of what time period the trails are considered to be "existing". The date is not completely clear from the document, but my understanding is that trails in existence by December 1999 will be considered existing for the purposes of this EIS amendment, and according to Dave Hause, that means that there should not be a conflict with the trails we groom.	
153	3	46120	I strongly support the restriction of new snowmobile trails and urge closing many existing trails that encroach on the periphery of remaining roadless tracts. During my experiences on Missionary Ridge I observed coyotes regularly traveling these paths throughout the winter. Occassionally they would venture off into the deep, unpacked snow off the snowmobile track, ususally to reach an elk hide or carcass but sometimes to reach a ridge and travel farther afield. The tracks allowed the coyotes to range deep into	Comment noted.

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			the snow-covered landscape into areas that they probably could never reach until the spring thaw and nightly freezes put a crust on the snow. I fear the snowmobilers also may impact the lynx detrimentally.	
159	5	46120	It may be difficult to control the snowmobilers going up into those parks, but I think we should try. The entries to the parks could be signed on posts saying the areas in back of the signs are closed to snowmobiling and why. I think some of the more responsible snowmobilers would honor the closures. There could even be trees felled to block the entrances to the parks, because entry in [some is quite narrow]. Whenever possible one of the Dolores rangers could visit the Pass area, especially during weekends and ticket any snowmobilers who they caught violating the closure.	Comment noted.
159	4	46120	The problem in the Lizard Pass area is unregulated snowmobile use. Within the past three years there has been a skyrocketing use of snowmobiles because of the gentle terrain and deep snow. I would hope that all snowmobiling would be excluded. But that is impossible. Those relatively small parks are where I have frequently seen lynx tracks. The lynx will rarely cross the large open parks that parallel the highway and the eastern branch of the Lizard Head Cr. but they frequently cross the smaller parks.	Comment noted.
168	6	46120	The FWS Remand Notice states: Despite the lack of evidence that competition with any species is negatively affecting lynx, the final rule expanded the theory that ski and snowmobile trails and roads that are maintained for winter recreation and forest management create packed snow corridors that give other species, particularly coyotes, access to lynx habitat on all land ownerships. This theory has neither been proven or [disproved] at this time (Roe et al. 2001) ...Because no evidence has been provided that packed snow trails facilitate competition to a level that negatively affects lynx, we do not consider packed snow trails to be a threat to lynx at this time. The FS should develop and adopt an alternative that drops all direction limiting snow compaction.	Comment noted. Site specific analyses will address specific areas of concern.
149	24	47000	VEG S5. This standard includes indefensible exceptions for "[d]eveloped recreation sites, administrative sites, or authorized special use improvements including within permitted ski area boundaries." DEIS at S-8. As with livestock grazing, the Lynx Science Report and the LCAS clearly document and account for the impacts of these sorts of sites to lynx habitat. See for example LCAS at pp. 21-26, 58-59, 83-84.	VEG S5 was reworded for Alternative F in the FEIS, based on public comments and new information. The FWS Final Rule for the lynx, published July 3, 2003, states that specific management activities and practices termed "risk factors", such as fire exclusion, grazing, and human uses that create snow compaction, were not threats to the overall population of Canada Lynx.
149	30	47000	HU S2. This non-discretionary standard (with the word "shall") is changed	Comment noted. A wide range of alternatives was considered.

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			to a discretionary guideline (with the word "should") (HU G11). The FS has no credible biological basis for relaxing this provision. The FS also fails to provide a clear estimate of the frequency with which this provision will be violated, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use.	Alternatives B and C provide direction within HU S3 for non-recreation special uses, and mineral and energy exploration and development. Alternative D provides direction within HU S3 for non-recreation special uses. Alternative F provides direction within HU G12 for non-recreation special uses, and mineral and energy exploration and development. The FS consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
149	31	47000	HU S3. This provision is inexplicably and indefensibly weakened. The preferred alternative narrows the standard to only include "non-recreation special uses," and to no longer include "mineral and energy exploration and development."	
150	43	47000	The DEIS states that All Standard 1 "would require ski area operations...to maintain the connectivity of lynx habitat." DEIS at 3-121. Further, the DEIS discloses that "this is the only instance where historic operations at existing ski areas may be affected by this alternative." This analysis is fundamentally flawed and should be rewritten. All Standard 1 applies to "new or expanded permanent developments." DEIS at S-4. Nothing in the standard states that it applies to historic, ongoing operations within existing developed recreation sites, such as permitted ski areas. The DEIS overlooks this critical point by mistakenly assuming that "historic operations existing ski areas" amount to "new or expanded permanent developments." DEIS at 3-121. The standard, by its very terms, does not apply to ongoing operations within existing special use permit boundaries. And as stated in Section G of our comments above, "expanded permanent developments" should not include terrain additions or other improvements inside existing ski area special use permit boundaries. An expansion should be an expansion outside existing permit boundaries, not terrain additions or improvements inside the present permit area.	Connectivity of habitat is an important aspect for lynx habitat. The ALL S1 standard would apply to permitted activities for any new development, even if it is within permitted boundaries, to maintain connectivity direction.
150	37	47000	CSCUSA urges the Forest Service to clarify that, for all standards and guidelines that exempt activities "inside special use permit boundaries," or that apply to ski area "expansions", or that apply to "new or expanded permanent developments," terrain expansions, capacity increases, or other improvements inside existing special use permit boundaries are not "expansions" or "expanded permanent developments." Expansions and expanded permanent developments are expansions outside existing special use permit boundaries.	Permanent developments are any development that results in loss of lynx habitat for at least the duration of the Forest Plan, approximately 15 years. Ski trails which are maintained in an early seral stage, parking lots, new permanent roads, structures, campgrounds and many special use developments would be considered permanent developments. HU standards and guidelines would apply to permitted activities for any new development, even if it is within permitted boundaries.
150	38	47000	At a minimum, the Forest Service should expressly state in the following standards and guidelines that terrain additions or other improvements inside existing special use permit boundaries are not "expansions" or "expanded permanent developments" within the meaning of the pertinent	

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			direction: All Standard 1, Alternatives B, C, and D, DEIS at S-4; Vegetation Management Standard 5, Alternatives B and C, DEIS at S-9; Human Use Objective 1, Alternatives B and C, DEIS at S-12; Human Use Standard 1, Alternatives B and C, DEIS at S-12; Human Use Standard 2, Alternative B, DEIS at S-13; Human Use Guideline 1, Alternatives B, C, and D, DEIS at S-13; Human Use Guideline 2, Alternatives B, C, and D, DEIS at S-13; Human Use Guideline 3, Alternatives B, C, and D, DEIS at S-13; Human Use Guideline 10, Alternative D, DEIS at S-14; Human Use Guideline 11, Alternatives C and D, DEIS at S-15.	
2	16	47500	Regarding lynx protections and recovery, please consider the following: Prohibit any further expansions of ski resorts into lynx habitat and ensure that forested islands between ski runs are off limits to skiers in and near lynx habitat	Comment noted. Direction is provided in HU S1 in Alternatives B and C and in HU G10 in Alternatives D and F.
78	6	47500	For the benefit of the lynx, other forest wildlife and the citizens of Colorado and Wyoming who value their natural surroundings, I urge the Regional Forester to adopt Alternative B with the following change: Allow no net new or expanded ski area development in lynx habitat: Ski area and associated developments have already had enormous impacts on lynx habitat and it is not the role of the Forest Service Region 2 to help individual ski areas increase their share in flat market conditions and when the acreage/skier ratio has been ballooning for years at the direct expense of forest habitat.	Comment noted.
126	38	47500	To justify its claim that large, unforested openings may not be harmful to lynx, the Forest Service inappropriately cites and unpublished report paid for by the recreational skiing industry (Roe et al. 2000).	The best available information was considered in the analysis. Updated information has become available since the initial analysis and has been considered and information updated in the analysis document as appropriate.
150	47	47500	The discussion of Human Use Guideline 2 in the ski area section, DEIS at 3-122, strays far from the reasonable language of the guideline and needs to be substantially rewritten: It wrongly states that "expanding" a ski area includes "expanded portions of existing ski areas." DEIS at 3-122. This language is imprecise and will certainly foster confusion. It should be rewritten to state that the guideline applies to new ski areas or expansions outside existing ski area permit boundaries. The Forest Service should explicitly state that terrain additions or other improvements inside existing permit boundaries are not subject to the guideline.	The "Roe Report" was reviewed for the analysis, even though it is not a research paper, nor peer-reviewed scientific literature. Both the "Roe 'Report" and the DEIS analysis acknowledge the lack of evidence regarding snow compaction and competition, either supporting or refuting the hypothesis. The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of

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				maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Dispersal travel movements may be much different.
150	49	47500	The discussion of Human Use Guideline 2 in the ski area section, DEIS at 3-122, strays far from the reasonable language of the guideline and needs to be substantially rewritten: The DEIS implies that lynx are not tolerant of human activities at ski areas such as grooming, snowmaking, and other routine operations. DEIS at 3-122. This assumption is contrary to significant information in the lynx Report documenting that lynx are highly tolerant of grooming, snowmaking, and other ordinary ski area operations. See Lynx Report at iii-v, 39-44. CSCUSA respectfully requests the Forest Service to base its analysis on the Lynx Report and CDOW reintroduction data rather than on the baseless theorizing inherent on page 3-122. Given the considerable data that weights against the theory, the Forest Service should identify the data that support this theory or stop advancing it. At a minimum, the Forest Service should identify the information (including the Lynx Report, 2003 Listing Decision, and CDOW data) which shows that lynx are tolerant of ski area operations.	The FEIS considered the updated information. Under Alternative F this guideline was revised and would not limit the timing of ski area and grooming operations. Alternative F is not anticipated to cause a disruption in snowmaking operations or grooming schedules.
150	27	47500	In addition to the CDOW reintroduction data and the 2003 Listing Decision, the Forest Service should incorporate important evidence from Canada which shows that lynx and ski areas can and do coexist. Nicholas A. Roe and Kim G. Poole authored the January 2000 report titled "A Review of Lynx Behavior and Ecology and its Application to Ski Area Planning and Management ("Lynx Report")." The Lynx Report has two parts: (i) a survey of anecdotal and scientific information about lynx from 11 ski areas in Canada, and (ii) a review of scientific literature on lynx to determine information about the species' ecology and behavior in relation to human activities.	The "Roe Report" was reviewed for the analysis, even though it is not a research paper, nor peer-reviewed scientific literature. Both the "Roe 'Report'" and the DEIS analysis acknowledge the lack of evidence regarding snow compaction and competition, either supporting or refuting the hypothesis. The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Dispersal movements may be much different.
150	24	47500	The Fish and Wildlife Service determined that "[w]hile it is assumed lynx would prefer to travel where there is forested cover, the literature contains many examples of lynx crossing large, unforested openings." Given that statement, along with the CDOW lynx monitoring data, the Forest Service should eliminate the statements on page 3-35 of the DEIS that ski areas restrain lynx movement. There is simply no basis for that assumption.	

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150	50	47500	The discussion of Human Use Guideline 2 in the ski area section, DEIS at 3-122, strays far from the reasonable language of the guideline and needs to be substantially rewritten: The DEIS states that Human Use Guideline 2 "may result in lost revenues and increased costs due to inefficient snowmaking operations" and "delayed" ski area openings. DEIS at 3-122. Again, this analysis has no basis and is contrary to the plain language of the guideline. The guideline allows only those actions that are "consistent" with a ski area's operational needs. Delayed openings, lost revenues, and inefficient snowmaking are not consistent with a ski area's operational needs. Those are not authorized restrictions or actions under the guideline. Those statements on page 3-122 should be stricken from the document. If left in place, such language delays or stops activities at the project level without justification.	Comment noted. The FEIS considered the updated information. Under Alternative F this guideline was revised and would not limit the timing of ski area and grooming operations. Alternative F is not anticipated to cause a disruption in snowmaking operations or grooming schedules.
150	48	47500	The discussion of Human Use Guideline 2 in the ski area section, DEIS at 3-122, strays far from the reasonable language of the guideline and needs to be substantially rewritten: The DEIS suggests that Human Use Guideline 2 will require constraints on snowmaking and grooming. DEIS at 3-122. This analysis incorrectly treats the guideline as a standard and overlooks that the guideline requires actions only insofar as they are "consistent with the ski area's needs" that the guideline requires and wrongly assumes that no balancing is required.	The FEIS considered the updated information. Under Alternative F this guideline was revised and would not limit the timing of ski area and grooming operations.
150	46	47500	In light of the evidence, it is arbitrary for the Forest Service to suggest that existing operations must be curtailed due to habitat connectivity concerns. Human Use Guideline 2 provides that: When developing or expanding ski areas, nocturnal foraging opportunities should be provided consistent with the ski area's operational needs, especially where lynx habitat occurs as narrow bands of coniferous forests across mountain slopes. DEIS at S-13. CSCUSA believes the guideline, as written, is appropriate. It offers flexibility in the form of a guideline (rather than a standard); it applies to new ski areas or (properly read) to expansions outside permit boundaries; and it requires balancing against "the ski area's operational needs."	
150	28	47500	In light of the Lynx Report, the CDOW data, and the 2003 Listing Decision the Forest Service should eliminate the statement on page 3-121 that Standard All 1 may restrict "historic operations at existing ski areas" and limit "use of some currently developed ski terrain." Moreover, the Forest Service should eliminate the statement about Human Use Guideline 2 on page 3-122 that "operational constraints" need to be placed on "grooming and snowmaking" to protect lynx. There is no basis for those determinations. Leaving such statements in invites unnecessary	The Ski Areas analysis in the FEIS has been revised to incorporate new information. Reference to historic operations and limiting use of some currently developed skiing terrain has been removed since that effect is no longer anticipated.

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			challenges at the project level.	
150	44	47500	The DEIS states that All Standard 1 "would require ski area operations...to maintain the connectivity of lynx habitat." DEIS at 3-121. Further, the DEIS discloses that "this is the only instance where historic operations at existing ski areas may be affected by this alternative." This analysis is fundamentally flawed and should be rewritten. The analysis in the DEIS at page 3-121 improperly assumes that existing ski areas pose obstacles to lynx movement. Ski areas are permeable to lynx movement as shown by the CDOW reintroduction data, substantial evidence from Canada detailed in the Lynx Report, and by the Fish and Wildlife Service's conclusions that lynx readily cross open areas and that forest roads do not pose threats to lynx. We are aware of no evidence that supports the speculative suggestion that ski areas are a barrier to lynx movement. The best available information is to the contrary.	
150	36	47500	Terrain additions and other improvements inside permitted ski area boundaries should not be considered "expansions" or "expanded permanent developments". Such areas are allocated to managed recreation and subject to extensive site-specific environmental review. This appears to be the intent of the DEIS.	Comment noted. Areas within existing permitted ski areas would not be considered expansions.
246	51	47500	Delete the wording "if it is identified as a need" from HU S2. The LCAS provides rationale for providing diurnal security habitat. The Department [of the Interior] believes that this standard should remain intact. Ski area development in conjunction with other human activities continues to reduce quality habitat conditions for snowshoe hares and lynx. The inclusion of this language erodes the likelihood of successful conservation and recovery of lynx in the SRMGA through the degradation of quality habitat conditions for lynx.	Comment noted.
235	40	50000	The Service must recognize the status of private and other non-federal lands, and the uses associated with those lands, in its exuberance to grant preeminent status to linkages.	The Forest Service recognizes there are non-federal lands within the areas identified as linkages. The Forest Service does not have the authority to regulate the activities that occur on the non-federal lands. The Forest Service will review any proposed uses of National Forest System (NFS) lands associated with the non-federal lands under the direction of the proposed Lynx amendment, as well as other applicable laws and regulations.
212	1	50100	Is there anyway the money being used for lynx introduction could be used by the Forest Service to buy the rest of the Beaver Brook wilderness area outside of Denver which is used by many, many people for recreational	The re-introduction of the lynx is a program managed by the State of Colorado. The purchase of land for NFS purposes is funded through a special fund allocated by Congress,

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			purposes. It is a very valuable piece of property owned by the city of Golden and gradually being bought by the Forest Service, but this year the appropriation by congress was much less than needed. I feel the benefits of having a beautiful mountain area park near a major metropolitan area would benefit many more people than the introduction of the lynx in a rural area, especially when the citizens of that area are all opposed.	approved by the President, and appropriated through the budget of the U.S. Forest Service, Department of Agriculture. The purpose of this analysis is management of lynx habitat under Forest Service authority. Redirecting state funds for purchasing lands is beyond the scope of this analysis.
210	1	50200	Why do we need Canadian lynx in Colorado? No more land closures.	Land closures are not proposed.
18	1	52000	I would like to state that I am not in opposition to the introduction of the Lynx. I am in total opposition to the closing of more and more public land. We have a business in South Fork and Creede and our livelihood and many other families' livelihood depends on these businesses. Introduce or re-introduce the Lynx, just don't close our national forest roads to snowmobiling, 4X4's and ATV's, we can co-exist.	Comment noted. Effects to transportation and recreation are discussed in Chapter 3.
20	6	52000	The Forest needs to be opened and not closed to the public. My wife has MS and she loves the forest but the only way she is able to be in the forest is via a snowmobile or ATV.	Comment noted. Opportunities for snowmobiling will remain as discussed in the recreation section in Chapter 3.
98	4	52000	The DEIS states that this program was developed based on the best science available. I believe that is not true for a couple of reasons: In order to gain public acceptance, people were told that there would be no changes of Forest management practices. The DEIS clearly points to future restrictions, not surprising to many locals. Repeated mentions of 'connectivity' are huge red flags waving at the public. What would actually happen to public land use? Will even more roads be locked away or not maintained? Will grazing permits be limited further? Camping and hiking? Should the public expect more wilderness for the elitists? These questions should be specifically addressed, with clear answers now, not little hints, saving details for later. Alternatives B and C do not enhance the NFS' credibility.	Potential future effects are described in Chapter 3. Specifically we indicate that while there are not likely to be any wide scale restrictions, there may be localized areas where conflicts occur and where some modification of the grazing management may be needed to properly manage the habitat for lynx (or more specifically for their prey species such as snowshoe hare). The kinds of modifications discussed includes changes in seasons of grazing use, restrictions on intensity of grazing, and fencing in limited situations.
118	6	52000	The Forest needs to be opened and not closed to the public.	Comment noted.
168	10	52000	Significant issues identified by BlueRibbon Coalition in Scoping comments remain ignored in the analysis. * The analysis did not address or discuss the relative advantage or disadvantage of the use of models instead of data. *Human activities contributing to various risk factors have not been quantified. *The analysis failed to discuss the availability of boreal forest habitat available to the lynx. *BRC strongly objected to the conclusions regarding over the snow recreational activities early on. The lack of empirical data was not addressed or disclosed in the analysis.	The LCAS (p. 2-6) indicates "very few studies have investigated the complex interactions between humans and wildlife." The FWS stated in the Remand Notice, "Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time" (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003). The DEIS Chapter 3, page 18 stated "Even though there is no

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				<p>hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that “Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey.” (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent of their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).</p> <p>In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.</p> <p>The standards developed in Alternatives B, C, and D for</p>

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				human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level. If it is found that lynx and coyotes are competing in a particular area due to snowcompacting activities then the guideline would be followed; and if not then the guideline need not be followed.
2/2; 2/3		61000	Preserving the few remaining wild, roadless areas and limiting clear cutting, OHV and snowmobile trails, mining, ski resort expansion will help to ensure the lynx's recovery in this region.	Comment noted. This amendment does not change the Forest Plan designations for Wilderness or roadless areas.
2	7	61000	Regarding lynx protections and recovery, please consider the following: The lynx management plan should not include exceptions for logging, drilling, or other potentially harmful activities.	Comment noted.
2	17	61000	Regarding lynx protections and recovery, please consider the following: Provide the strongest possible protection to the greatest possible amount of wild lands in our National Forests. Ultimately, this is what will ensure the future of the lynx. For too long our public lands have been managed to the betterment of the corporate balance sheet and not for the betterment of the American public. Today Americans are demanding that these lands be preserved in their natural state, for the betterment of wilderness, wildlife, and future generations. Please do all that you can to ensure that this happens. This is what will ensure the Lynx's future, and the future of our National Forests.	Comment noted.
21	3	61000	The Lynx Plans should not allow any exceptions for drilling, logging, or any other environmentally damaging activity.	Comment noted.
83	1	61000	In this land of unimaginable beauty and resource I have become saddened by the decline of the health of our forest lands. Due to the lack of proper management the forests in Colorado are falling victim to insect epidemics, disease, over growth, ladder fuels, over maturation, and fire. Our forests are facing possibly the greatest perils in recorded history. It is estimated that ninety-six percent of all pinyon will be lost due to insect and disease. How many acres will burn? Every fire reduces the amount of livable forest land for Colorado wildlife. Proper management of our forests will reduce these problems. Removing ladder fuels reduces the risk of fire	The health of forest lands is dependent on management objectives. The recent high level of tree mortality from bark beetles is widely considered an unhealthy condition. However, management or the lack of management is a relatively small part of much larger natural processes that while undesirable are probably within the historical range of variability. Pinyon pine a not considered lynx habitat. Ladder fuels are a natural part of the spruce-fir forest that serves as the primary habitat for lynx. Exceptions are allowed under Alternatives D and F to

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			and in turn improves wildlife habitat; a charred forest is not good habitat for any animal. Stopping work in Colorado woodlands will only lead to the loss of more habitat, for the lynx and the wildlife that has inhabited these forests before lynx were transplanted.	reduce wildfire hazards in the wildland-urban interface. Fires are infrequent, but severe in the spruce-fir forests. These forests and the dependent wildlife species have evolved with infrequent, large, high-severity fires.
117	8	61000	Many of the currently Alternative D Standards and Guidelines appear to be very limiting in management flexibility to address site specific situations. Many of these as written are an inflexible fix to an unproven concern applied across the entire Southern Rockies. To add reasonable management flexibility into the amendment to address site specific situations, add the following: HU G7. Replace with Avoid building new permanent roads on ridge tops, saddles, or forested stringers in areas identified as important for lynx connectivity unless no other environmentally preferred route is available.	HU G7 is a guideline as opposed to standard, exceptions can be made without a forest plan amendment based on site-specific analysis.
117	19	61000	HU G6 Alternative D Please rewrite this Guideline to provide more of an emphasis on public safety and resource protection than the other alternatives provide.	Comment noted. Rewriting this guideline was not determined necessary. Providing for public safety is considered when identifying roads to upgrade due to traffic volume.
117	7	61000	Many of the currently Alternative D Standards and Guidelines appear to be very limiting in management flexibility to address site specific situations. Many of these as written are an inflexible fix to an unproven concern applied across the entire Southern Rockies. To add reasonable management flexibility into the amendment to address site specific situations, add the following: HU G10. Add to the end of the first sentence: unless a site-specific assessment has been completed which determines there will be minimal impacts to lynx.	HU G10 is a guideline as opposed to standard, exceptions can be made without a forest plan amendment based on site-specific analysis.
122	1	61000	During a period of growing understanding about the scale of health related management needs in the forests in Colorado, an amendment such as this proposal would be devastating to activities to restore health and balance to forest management. Faulty logic driven by biologists who focus only on lynx and lynx habitat would eliminate precommercial thinning in lynx habitat. This prohibition will have far more significant effects on the long-term management and health of the national forests than disclosed or analyzed in the DEIS. Clearly, no thought was given to the ability to proactively manage the vast acreage of Lodgepole pine that surrounds the ski communities and provides the backdrop to Colorado tourism. No discussion/analysis of stand condition was provided as part of the management planning. No recognition was given to the homogeneity and age class of both the Lodgepole Pine and Spruce-Fir in Colorado's high elevation forests. No recognition was given to the very real risk of	The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres

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			landscape level disturbance that is now occurring as a result of the stand conditions existing today as exacerbated by drought and insect and disease pressures.	precommercially thinned and the percent of the baseline acres that would be thinned.
137	5	61000	Guideline HU-G10 is much too vague (p. S-12 "Baseline areas of consistent snow compaction by LAU, on in a combination of immediate adjacent LAUs" is pretty meaningless and confusing. It allows for too much increase in winter trail use by 50% (p. S-18 Summary) will have negative impacts on lynx.	The Recreation analysis in the FEIS notes that under the action alternatives, limiting increases in groomed and designated over the snow trails would keep the trail system at its present size. Not all designated trails are currently groomed, so additional trails may be groomed to accommodate anticipated increases in use (e.g. increased traffic on a given trail). See the Recreation analysis in the FEIS at pages 183-188. See the Wildlife analysis in the FEIS at pages 66-107 for discussions of anticipated effects to lynx.
177	4	61000	Of the human uses (3), the main detriments to lynx are unsustainable spruce fir logging in backcountry areas, which are far from reasonable defensible space from fire, and increased compaction from snowmobiles. Fragmentation from oil and gas development (mainly from access roads) is usually as bad or worse, but luckily it is uncommon in the Southern Rockies spruce fir forests. With so little interest in it here anyway, I can't see why it would be allowed.	HU S3 for Alternatives B, C and D and HU G12 in Alternative F provide direction for non-recreation special uses to address other multiple uses of the Forest lands. This addresses a portion of the purpose and need pertaining to "preserving the overall multiple-use direction in existing Forest Plans."
204	5	61000	Human Uses Management Activities and Practices; Delete all Human Impact items, except retain or modify the following as noted: HU S3 - Retain as written HU G4 - Retain as written HU G5 - Remove the words 'road reclamation' HU G7 - Note; This item should certainly be removed. The requirement that roads avoid ridge lines, and not cross saddles is in direct contradiction to published Forest Road design guidelines published by the US Forest Service. Road designs that follow ridge lines and cross saddles are prudent construction practices that minimizes environmental impact, including runoff/erosion concerns. HU G8 - Retain as written HU G9 - Change 'should be restricted' to 'will be allowed when safe to do so'. Further modify in it's entirety to state that such roads developed to a Maintenance 3 level or higher, shall remain open at a Maintenance 3 level. Only exception is when the existing land owner determines that at the end of project-specific activities, the road is to be closed through any section(s) they own. Such closure will require reclamation by the owner of the subject road section(s) by native vegetation reseeding.	HU G4, G5, G7, G8, G9 and G10 are guidelines as opposed to standards; exceptions can be made without a forest plan amendment based on site-specific analysis. This addresses a portion of the purpose and need pertaining to "preserving the overall multiple-use direction in existing Forest Plans."
205	2	61000	[Respondent] expressed concern with the effects to ranchers and other industries that use the National Forests. Additional restrictions for species	Comment noted. The Purpose and Need is: To establish management direction that conserves and promotes the

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			make it more and more difficult for industries.	recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices on the Southern Rockies national forests, while preserving the overall multiple-use direction in existing Forest Plans. Meeting the intents of ESA, NFMA, and MUSYA were considered.
227	3	61000	As a member on the Creede/Mineral County Chamber of Commerce, I am very concerned about the discussion around the lynx issue. Our economy is tourism based. We are actually designated as a frontier county. The attraction to this area is the abundant forest in our county. More than 90% of Mineral County belongs to the Forest Service or Bureau of Land Management. If activities on the forest are restricted the entire economy in this area would be devastated. With the economic downturn, recent forest fires and terrorists events, many businesses are already suffering. Any further restrictions would be the final blow to many of the small business owners in this area. Please do not restrict our forests... please choose Alternative D.	Comment noted. There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
229	4	61000	As you know, lynx are very susceptible to impacts from logging, road building, off-road vehicles, drilling, or other invasive operations. Therefore, please do not include any exceptions in the management plan for any logging, road building, drilling, off-road vehicular use, or any other human activities that could impact lynx or lynx habitat.	Comment noted. The alternatives provide a range of management direction in the form of standards and guidelines. Logging, road building, off-road vehicle use, drilling, and other operations are part of the other multiple-uses that occur on NFS lands. Direction pertaining to these management practices and activities addresses a portion of the purpose and need pertaining to "preserving the overall multiple-use direction in existing Forest Plans."
237	11	61000	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: There is also a future snow course up Bear Creek from the Dolores River on the North side of the La Plata mountains.	HUS3 Winter access for non-recreation special uses shall be limited to designated routes or designated over-snow routes. In other words, access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
237	10	61000	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: We have to be able to access snow courses in the La Plata River Drainage and on the West Mancos draining area in the La Platas.	
237	5	61100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: It appears as though the SNOTEL site shown in or near our Pueblo office is the Whiskey Creek	

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			site...we do not measure or otherwise have need to access it. We presume that those who do (NRCS?) have to get there somehow and we would not want to see that disrupted.	
237	7	61100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: The Grand Mesa is unique in that it is home to some 200 reservoirs. A number of these reservoirs require periodic visits in the wintertime to monitor dam safety conditions or to clear snow banks from spillways. It is imperative that snowmobile access be allowed to continue in order to perform these essential duties.	
237	6	61100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: Los Pinos Snow Course; Sec 4, T32N, R5E, NMPM; Lily Pond Snotel, Sec 8, T36N, R4E, NMPM; Platoro Snow; Course, Sec 22, T36N, R4E, NMPM; New Mexico Snow Course, Sec 5, T30N, R7E, NMPM; Numerous SNOTEL and Snow Course sites in the Grand Mesa area.	HUS3 Winter access for non-recreation special uses shall be limited to designated routes or designated over-snow routes. In other words, access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
237	9	61100	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: YK00K1, BO99M3, BC03F06 straddle Hwy 82 near Independence Pass, as the crow flies is not far from the Fryingpan, where we use a snowmobile to access gaging one to two times a winter.	
6	5	61100	The lynx management plan should not include exceptions for logging, drilling, or other potentially harmful activities.	Comment noted.
15	2	61100	This proposal will likely harm those species of animals which are actually present and dependent on the forests in Wyoming. Restrictions for individual species place further limitations on the effective management of all species, as well as on the management of land use and multiple-use activities. Forest management needs to remain flexible, with federal officials dedicated to the efficient management of their limited resources for many uses, many activities, and many species.	Comment noted. The alternatives provide a range of management direction in the form of standards and guidelines. Other multiple-uses of the NFS lands were considered in the development of alternatives. Effects to other species were considered and disclosed in the Wildlife section discussion of Management Indicator Species. Guidelines provide management flexibility, and new information will be considered during site-specific analyses. Direction was developed to address the portion of the purpose and need pertaining to "preserving the overall multiple-use direction in existing Forest Plans."
64	91	61100	Should certain activities be implemented under the lynx conservation requirements - new snowmobile and ski routes, restrictions on existing	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season.

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			recreation use or roads, new oil and gas exploration and development in adjacent or nearby areas, etc. - it would be likely that significant changes in recreation patterns and economic impacts may emerge.	Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
64	46	61100	Additional disclosure of cumulative impacts from proposed management direction is needed in the Final EIS, to evaluate not only all lynx risk factors but also their cumulative and synergistic effects (e.g., altered lynx habitat in a grazed riparian area displaces the lynx to choose another linkage corridor that has a road crossing or through a snowmobile area).	The best available information was considered during this analysis. Cumulative effects are disclosed in Chapter 3 by resource area. Site specific project proposals will continue to consider the best available information and disclose cumulative effects in those future analyses.
71	5	61100	This plan should not include exceptions for logging, drilling or other potentially harmful activities.	Comment noted.
142	3	61100	The US Forest Service should have all the tools needed to manage our public land for all. This would include fire control and the use of public land for all.	Comment noted.
191	4	61100	I find it outrageous that the lynx management plan should include exemptions for logging, drilling and other harmful practices. We already have the Healthy Forests Act and lord knows drilling is not imperiled. But the lynx is, and our commitment to its recovery is a joke if we allow so many "exceptions" as to offer no protection whatsoever.	The Purpose and Need is actually stated: To establish management direction that conserves and promotes the recovery of lynx, and reduces or eliminates potential adverse effects from land management activities and practices on the Southern Rockies national forests, while preserving the overall multiple-use direction in existing Forest Plans. Suggestions noted.
84	1	61210	Federal agencies must consider the impact of the proposed Canada Lynx Amendments to existing federal agency commitments to multiple use (i.e., existing grazing permits, oil and gas leases, current production operations and applications for permit to drill (APD), timber harvesting, recreation, etc.) and adjacent state and private landowners.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
226	1	61200	The State [of Wyoming] applauds proactive efforts to conserve T&E species; however, the amendment appears to be overzealous in its efforts to manage a species in marginal habitat and range that is occupied only periodically based upon the undulating hare populations in Canada as discussed in the environmental impact statement. The Wyoming Natural Diversity Database confirms our position as it states that there is a small Wyoming lynx range, with low range occupation and low abundance. It is my suggestion that based on the lack of specific science supporting lynx management and lack of adequate habitat in Wyoming that the amendment should call for a more general conservation approach that is less intrusive on management benefiting other biological components of forests.	Comment noted. There is good evidence that lynx occurred in the Southern Rockies in the 19th and 20th century, sometimes in abundance. The Southern Rockies is at the southern edge of their range. A range of alternatives was developed to respond to the issues and public comments..

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140	5	61210	I would also like to mention that curtailment of the forest use would have a significant negative impact on the economy of the Creede area, which depends heavily on responsible recreational use to attract visitors.	There is no indication that lynx habitat restrictions would translate into recreation use reductions during any season. Some winter motorized recreation users may encounter a lower quality experience, but reduced numbers are not anticipated. Consequently, adverse impacts to tourism in the analysis areas are not expected.
196	1	61210	Introduction of the lynx serves what goal of multiple use, that policy which is designed to open the forests for people? It is a policy that does not place animals ahead of citizens. Introducing lynx ignores citizens. It also disobeys your Congressional mandate to manage according to multiple use.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. Conservation of wildlife habitat is one of the multiple uses identified in the Multiple Use Sustained Yield Act.
237	4	61210	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: Long draw is a major storage reservoir and Grand is a major transmountain diversion. Many entities are interested in the snow course data. A lot of people might be concerned about "corridor" closures if more facts were available.	HUS3 Winter access for non-recreation special uses shall be limited to designated routes or designated over-snow routes. In other words, access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
149	59	61220	The proposed lynx amendment fails to address at all the conservation needs of the lynx's ecosystem other than the habitat components directly related to lynx. There are numerous other species that depend on the same sort of denning habitat components required by lynx, for instance, that could and should be considered in this EIS. Protecting mature forests, snags, and down woody debris, for example, might benefit other at-risk species such as pine marten, northern goshawk, and cavity nesting birds.	The existing Forest Plans provide management direction for other Threatened, Endangered and sensitive species.
149	57	61220	We are dismayed that the DEIS fails to take an ecosystem management approach to the question of lynx conservation. The ESA's explicit purpose is to conserve the ecosystems of threatened and endangered species, so the absence of a direct ecosystem approach in the DEIS is both biologically and legally remiss.	Within the Wildlife section of Chapter 3, the Biological and Characteristics of Lynx Habitat in the Southern Rocky Mountain Geographic Area are discussed. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
64	60	61300	Because of the myriad threats to lynx recovery noted in the Lynx Biological Opinion and the direction proposed in the DEIS, a process of cumulative effects analysis is needed to assess the combined magnitude of all affects to lynx and develop adaptive management criteria to respond to	Cumulative effects are disclosed in Chapter 3 by resource area. Site specific project proposals will continue to consider the best available information and disclose cumulative effects in those future analyses.

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			unexpected, adverse effects.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
117	9	61310	With the limited knowledge of the lynx and lynx habitat in the Southern Rockies and the unknown response of lynx to these management standards and guidelines, I think it is important to have a Monitoring Strategy associated with this amendment that includes adaptive management. I suggest that the following monitoring item be added: At 5 year intervals or less, conduct interdisciplinary monitoring for the effectiveness of these Standards and Guidelines and adjust them as needed to either increase protection measures or eliminate the standard or guidelines if found not be needed.	Comment noted. The best available information was considered for this analysis. Site-specific analyses will continue to incorporate new information as it becomes available.
8	6	62000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected national forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on precommercial thinning will contribute to long-term risks of insects, disease and fire.	The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
14	6	62000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected national forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on precommercial thinning will contribute to long-term risks of insects, disease and fire.	The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
64	36	62000	We suggest evaluation of whether it is appropriate to apply the VEG S2 Standard to all vegetation management rather than only timber management. It is unclear from the DEIS why this Standard applies only to timber management.	This standard applies to all activities that regenerate forested stands, except for fuels treatments within WUI areas. The wording of where the standard applies is as follows: Standard VEG S2 applies to all timber management practices and activities that regenerate forested stands, except for fuel treatment projects within the WUI as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2,

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				VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest).
64	86	62000	The seven exceptions and five additional situations under VEG S5 need to be better defined to indicate the acreage that may be involved. How many acres may be affected by pruning, transplanting, and Christmas tree and ornamental tree harvest?	Appendix F notes the criteria for lynx habitat and noted climax lodgepole pine should not be included as vegetation contributing to lynx habitat. Not all timber types are included as vegetation contributing to lynx habitat. During site specific project planning mapping may be updated to reflect the site specific conditions. The FEIS includes updated information in the Forest Resources - Timber Management section.
95/44; 127/44	44	62000	VEG S5. Precommercial thinning does have at least temporary effects on snowshoe hare populations at the stand level. However, this possibility needs to be weighed against other landscape considerations. It is entirely likely that stands in other habitat conditions, i.e., unmanaged, are even less suitable habitat. Thus, moving stands in that condition into management, even with precommercial thinning, could enhance overall suitability of the landscape.	
95/45; 127/45	45	62000	VEG S5. As outlined in Table 3-T3, the national forests included in this DEIS are now thinning less than 15% annually of the identified needs and the restrictions in VEG S5 will reduce the level of thinning even further. However, comparing the effects of implementing VEG S5 to current levels of thinning is very misleading; currently the number of acres thinned is limited by funding, but VEG S5 will cap thinning to an even lower level, which Forests will not be able to exceed even if additional funding becomes available. The effects of VEG S5 should be re-analyzed comparing acres of permitted thinning to acres of thinning needs.	
95/31; 127/31	31	62000	We are very concerned about the long-term effects of proposed VEG S5 on timber production and timber sale programs in Colorado and southern Wyoming. According to page 42, for Alternative B this standard in lodgepole pine "would result in essentially no precommercial thinning within lynx habitat...for an indefinite period" and "an 89% reduction of production of sawlog-sized material would be anticipated over the next 60 years". Alternative D is only marginally better, as it would allow "for thinning to occur in some stands prior to the permanent loss of the physiological ability of a tree to respond", and the reductions in future sawlog volume production "would be less than under Alternative B".	
95/29; 127/29	29	62000	Based on the current forest plans, the national forests covered by this DEIS have a combined 2.665 million acres of suitable timberlands. Virtually all of the timber management and all of the accomplishment of forest plan goals and objectives on suitable timberlands for the overwhelming majority of suitable timberlands in Colorado and southern	

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			Wyoming will be subservient to lynx goals and objectives, contrary to both the Organic Act and the National Forest Management Act.	specific conditions. The FEIS includes updated information in the Forest Resources - Timber Management section.
95/58; 127/58	58	62000	We strongly object to the restriction on salvage harvest, especially on lands determined to be suitable for timber production in the forest plans. There is ample historic precedence that even small patches of blowdown or fire or insect mortality can lead to significant increases in fire risk, insect population buildups.	Comment noted. Standards VEG S1 and S2 do not apply to salvage logging because salvage logging is generally done on areas already changed to a stand initiation structural stage by a disturbance. For example, after a stand replacing fire the resulting stand is already in the stand initiation condition.
238	7	62000	The restriction on salvage harvest especially on lands determined to be suitable for timber production in the forest plans should be removed. There is ample historic precedence that even small patches of blowdown or fire or insect mortality can lead to significant increase in fire risk, insect population buildups.	Salvage harvest does not create the stand initiation condition. Even if salvage harvest were to limit the ability of the forest to provide winter snowshoe hare habitat this would be taken into account in the 30 percent standard. If this were the case, those acres would be included in the 30 percent standard until the young regenerating forests provide winter snowshoe hare habitat. Limitations on salvage harvest is included for protection of denning habitat. Alternatives B and C limited salvage treatments under 5 acres in VEG S4. Alternative D provided a similar limitation in VEG G8. The LCAS recommended retaining 10 percent denning habitat based on a publication that discussed maintaining lynx habitat over time (Brittel et al. 1989). Brittel recommended a balance of conditions – 30 percent forage, 30 percent unsuitable habitat that would grow into forage habitat, 30 percent travel, and ten percent denning. The ten percent denning habitat was generally based on providing 10 percent old growth habitat. Ongoing research since 1989 has shown that lynx dens are often found under large logs in mature forest stands, but dens have been located in smaller diameter “jack-strawed” piles as well as in rock piles in a variety of structural stages from young regenerating forests to old forests. The integral component of lynx den sites appears to be the amount of downed, woody debris, not the age of the forest stand (Mowat, et al. 2000). Lynx den sites are found in both mature and younger forests that have a large amount of cover and downed, large woody debris. The structural component of lynx den sites are common features in managed (logged) and unmanaged (e.g. insect damaged, windthrow) stands. Based on 40 den sites studied by Squires et al. (in prep) denning habitat is found in a variety of forest conditions and is not a limiting factor for lynx.

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				Indeed, lynx have used all kinds of deadfall for den sites, so it is likely almost any forest does supply denning habitat. Based on this information, the ID team developed Alternative F which consolidates all the denning requirements into one Guideline; Guideline VEG 11. The research does not indicate a certain minimum amount of denning habitat is required for lynx. The research does indicate that pockets of large amounts of down wood, root wads, or large piles of small wind thrown trees provide denning habitat; and that these pockets should be distributed across an LAU. In general, most forests have some pockets of down trees that would be adequate denning habitat. However, under Guideline VEG G11 if denning habitat appears to be lacking in an LAU, then projects should be designed to retain coarse woody debris, piles, or residual trees to provide denning habitat.
95/57; 127/57	57	62000	VEG G7. We strongly object to the construction of this Guideline as a restriction on activities rather than a Desired Condition. Further, given the tremendous impact of fire and insect epidemics in Colorado and Wyoming, this Standard will unnecessarily restrict projects designed to reduce the risk and spread of fire and insect epidemics. Why doesn't this Standard reflect "historical levels of habitat"?	Comment noted. The EIS is a programmatic document covering 7 National Forest administrative units. General desired conditions are referenced regarding landscape diversity and structural stages as they relate to lynx habitats. Denning habitat structural characteristics are discussed. The likelihood of long term lynx population persistence is also discussed. The Vegetation standards and guidelines indirectly state the desired future condition for lynx habitat. For example, VEG S3 directs that at least 10% of the habitat should be in denning habitat (typically old growth structural stage) and well-distributed. VEG S1 directs that no more than 30% of the habitat should be in the very early seral stages (seedling/stand initiation stage).
95/51; 127/51	51	62000	VEG S5. If implemented, this Standard will result in stagnation and significant loss of growth, especially in lodgepole pine, which will never be recovered; besides the loss of timber growth, this will contribute to the already overabundant mid-serial class landscape structure with limited future options.	The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve
95/52; 127/52	52	62000	VEG S5. Precommercial thinning may enhance development of structural components favorable for wildlife species associated with more mature forests, but that seems not to have been considered in this analysis.	

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95/2; 127/2	2	62000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected national forests are included in Lynx Analysis Untis, and the proposed restrictions on precommercial thinning will reduce the growth of sawtimber by as much as 89%, thereby reducing future harvest levels, eliminating future management options, and contributing to increased risks of insects, disease and fire.	<p>some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.</p> <p>Appendix F notes the criteria for lynx habitat and noted climax lodgepole pine should not be included as vegetation contributing to lynx habitat. Not all timber types are included as vegetation contributing to lynx habitat. During site specific project planning mapping may be updated to reflect the site specific conditions.</p>	
95/3; 127/3	3	62000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Elimination of precommercial thinning is also contrary to the Healthy Forest Initiative and the Forest Service's strategy to address fire and fuels as one of the Four Threats to the national forests.		
95/18; 127/18	18	62000	The trend in recent forest plans is for the amount of Structural Stage 1 and 2 to remain about the same and for the amount of Structural Stage 4 and 5 to increase. As pointed out on page 3-69 of the DEIS, "the extent of the landscape modified by timber management activities, however, is considerably less than for fire, insects, and windthrow". Yet, timber management activities will be the most severely impacted and curtailed by these forest plan amendments.		
109	16	62000	You are restricting management of Timberland on virtually all of the suitable acres in these national Forests. This will result in the elimination of fuels management options, insect and disease treatments, salvage sales, and will cause further decline in employment in rural forested areas of Colorado near and in National Forests. It will also cause reductions in other wildlife and plant species that are disturbance dependent.		
109	17	62000	There were fewer trees in Colorado before settlement than there are now. There were probably lynx in Colorado then also. It is just not logical to equate timber harvest with damage to lynx with a broad brush. The two can co-exist. Fewer stems per acre might be of benefit to the lynx as it will increase edge effect, and provide habitat for additional forbs and grasses to develop where there are none under dense stands at present, This will increase hiding cover as well.		Comment noted.
117	17	62000	Please confirm in the EIS and in the ROD that no reduction in timber management outputs will occur under the Standard ALL S1.		The Forest Resources analysis has been updated. Analyzing the maximum allowable sale quantity (ASQ) over a 10-15 year period for the individual forests was not determined
122	2	62000	Over 80% of the suitable timber acres in the affected national forests are		

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			included in Lynx Analysis Units, and the proposed restrictions on precommercial thinning will reduce the growth of saw timber by as much as 89%, thereby reducing future harvest levels, eliminating future management options, and contributing to increased risk of insects, disease and fire. Elimination of precommercial thinning is also contrary to the Healthy Forest Initiative and the Forest Service's strategy to address fire and fuels as one of the Four Threats to the national forests.	necessary. Forest health issues were reviewed and long term sustained yield impacts were estimated and updated effects are disclosed in the Forest Resource section in Chapter 3 of the FEIS. The effect of thinning on commercial timber sale volumes will not happen for many decades – well beyond the 2007-2011 analysis timeframe used in the employment and income analysis. The implication of potential commercial timber sale volume upon the timber industry many decades from now is speculative at best, and therefore not addressed. The benefits and costs of future commercial timber sale volume are addressed, however, in the Financial/Economic Efficiency subsection.
127	1	62000	The proposed amendments are premature and inappropriate since the US Fish and Wildlife Service has not yet designated Critical Habitat or developed a Recovery Plan.	The FWS designated critical habitat in 2006. This decision is now being reviewed. All forests in the amendment area have confirmed lynx sightings and are considered occupied. Although a Recovery Plan is not available, the best available information including a Recovery Plan Outline was used in developing this EIS.
137	3	62000	We are concerned that any disturbance allowed for salvage treatments, "conifer removal" within aspen stands, regeneration treatments, etc will negatively affect lynx. Alternative D Standard VEG S5 (p. S-8 of Summary) has too many exceptions, and will negatively affect lynx.	
148	4	62000	Very little lynx habitat (high elevation, climax lodgepole and spruce/fir forests) can be considered "commercial" timberland. Webster's defines commercial as activities "...done primarily for sale or profit". Logging high elevation public forests where lynx are found is less than profitless from the general public's viewpoint. Not only are these below cost sales immediately profligate but their long term impacts on wildlife habitat prized recreation are unmitigated disasters. Commercial logging of lynx habitat is only "profitable" in Forest Service parlance, it is a fool's bargain by any other standard.	Comment noted. This analysis is not related to designating lands suitable for timber production. Suitable timber lands are identified in the Forest Plans. Appendix F of this analysis describes the procedures followed for lynx habitat mapping.
156	1	62000	Why is it that you believe the direction for lynx management must take into account virtually every acre of suitable timber lands in this area? Does anything else get that kind of consideration? I believe you are premature with your proposed amendments to forest plans. I also believe they are inappropriate and have significant detrimental impacts on long-term forest management, as well as forest health.	Comment noted. This analysis is not related to designating lands suitable for timber production. Suitable timber lands are identified in the Forest Plans. Appendix F of this analysis describes the procedures followed for lynx habitat mapping.
138	2	62000	The thinning of forests to create more open space and grasslands is false	The Forest Resources - Timber Management analysis was

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			science. USFS documents that grassland fires are more dangerous because they spread rapidly and are harder to control. Trees hold soil moisture.	updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat
146	6	62000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected national forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on precommercial thinning will contribute to long-term risks of insects, disease and fire.	such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
158	2	62000	The proposed elimination of pre-commercial thinning in lynx habitat will have more significant effects on the long-term management, outputs and health of the national forests than are disclosed or analyzed in the DEIS.	
158	3	62000	Over 80% of the suitable timber acres in the affected national forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long-term snowshoe hare habitat, the proposed restrictions on pre-commercial thinning will reduce the growth of saw timber by as much as 89% and contribute to long-term risks of insects, disease and fire.	
238	9	62000	We are very concerned about the restrictive nature of standard VEG S5, regarding precommercial thinning. What are the short-term implications for the Routt National Forest when the LTSY is projected to drop approximately 16%?	
238	6	62000	81% of the suitable timberlands in Colorado and Southern Wyoming are included in LAUs. Further, the number of acres in LAUs (from Table 3-T2) equal the following percentages on a forest by forest calculation – GMUG - 99%, MB – 50%, Routt – 104%, RG – 100%, AR – 189%, PSI – 28% and SJ – 68%. (Virtually all of the timber management and all of the accomplishment of forest plan goals and objectives on suitable timberlands for the overwhelming majority of suitable timberlands in Colorado and Southern Wyoming will be subservient to lynx goals and objectives.	The Forest Resources analysis has been updated. Analyzing the maximum allowable sale quantity (ASQ) over a 10-15 year period for the individual forests was not determined necessary. Forest health issues were reviewed and long term sustained yield impacts were estimated and updated effects are disclosed in the Forest Resource section in Chapter 3 of the FEIS.
95/33; 127/33	33	62100	Chapter 1, Purpose and Need already acknowledges, "Adjustments to individual plans may be considered as they are revised during the next several years." Once this standard is incorporated into forest plans, we fully expect that the various national forests will immediately start reducing the annual sales program to adjust for the above projected reductions, or	Appendix F notes the criteria for lynx habitat and noted climax lodgepole pine should not be included as vegetation contributing to lynx habitat. Not all timber types are included as vegetation contributing to lynx habitat. During site specific project planning mapping may be updated to reflect the site

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			they will use the lynx direction as rationale for reducing the ASQ during subsequent forest plan revisions or amendments without any further analysis of the underlying restrictions on precommercial thinning.	specific conditions. The FEIS includes updated information in the Forest Resources - Timber Management section.
2	11	62200	Regarding lynx protections and recovery, please consider the following: You should discourage wide spread application of clear cutting to improve lynx habitat. The fragmentation of habitat will be far more harmful in the long-run than the short-term gain provided by younger forest habitat.	Comment noted.
2	12	62200	Regarding lynx protections and recovery, please consider the following: You should ban the cutting of Englemann spruce-subalpine fir old growth in potential lynx habitat. All remaining old growth areas should be permanently protected from logging and all other forms of human disturbance as much as possible.	Comment noted.
2	15	62200	Regarding lynx protections and recovery, please consider the following: Limit or prohibit any form of salvage logging.	Comment noted.
64	72	64000	Grazing may allow larger predators to displace and possibly prey on lynx, for example in riparian corridors, which provide important linkage corridors and habitat for lynx and where livestock animals such as calves may be more likely to attract larger predators.	Standards and guidelines, as well as standard management practices including management of time and timing, frequency, duration, and intensity of livestock grazing would be expected to reduce the potential for large predators keying on livestock. In addition, since virtually all of the calving by permitted cattle occurs on private lands well before entering the National Forest (calving in February – March; entry to the NFS lands June to July), the likelihood of large predators keying on cattle is reduced. Domestic sheep are normally associated with riparian areas during short watering periods, with most of their time being spent in uplands. This again would tend to reduce the potential for large predators keying on livestock in riparian corridors.
64	71	64000	The Remand Notice concludes that no evidence exists to determine that livestock grazing activities pose a significant threat to lynx and concludes that those activities are not known to pose a significant threat to lynx. However, we know from previous USFS analyses that grazing causes direct and indirect impacts to wildlife habitats, as opposed to direct mortality impacts to lynx and other predators.	In significant part, the rationale for discussing livestock grazing in relation to Lynx habitat and for including appropriate standards and guidelines in the DEIS, as noted by Mr. Crowther in his comment, is the potential for direct and indirect impacts to habitats.
121	4	64000	Specific to grazing, the EIS recommends curtailment of grazing in the case of fire damage, to ensure sprout survival, to protect riparian areas for achieving preponderance of mid or later seral stages etc. This is not a new practice and is not specific to lynx but rather specific to the protection and recovery of the resources. Why does a lynx EIS include this redundancy?	The standards and guidelines do not recommend “curtailment of grazing” to ensure sprout survival as indicated in the comment, but rather indicate that livestock must be managed in a manner that will ensure that impacts related to the livestock grazing do not inhibit recovery to the degree that the

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				stand cannot recover. The reason for including this language is to clarify previous direction by focusing on the potential for impacts specific to livestock grazing, and to ensure that practices to be applied on the ground are focused on the actual cause and effect.
134	5	64000	Allowing livestock to continue grazing further into protected forest is steadily destroying the lynx habitats.	Livestock are not being allowed to “graze further into protected forests” as indicated by the comment. No additional livestock grazing is being authorized by any of the alternatives, nor are any additional acres being opened to livestock use. Rather, the standards and guidelines are focused on ensuring that potential impacts on lynx habitat relative to existing livestock grazing are being managed in a manner that will meet lynx habitat needs.
137	4	64000	Regarding grazing standard: How will G2 and G3 be implemented? No mention is made as to how aspen and willow stands will be protected from over-grazing by livestock.	With regard to the comment: “how will G2 and G3 be implemented,” it is necessary to allow flexibility in determining the specific practices needed to meet these guidelines. Each situation will be different in terms of: resources affected; amounts and timing of livestock use/effects, and so forth. A “one-size-fits-all” approach would seldom be the best answer. In general terms, the manager can respond to concerns by altering the time or timing, intensity, frequency or duration of livestock. They can do this by adjusting the grazing management system for one or more years as needed, or in more difficult to manage situations, they may exclude the area from livestock for a period of time. This exclusion may range from simply resting the affected pasture to temporary electric fencing to more permanent hard fencing as appropriate. The key is that the appropriate tools must match the situation on the ground.
149	33	64000	LINK S2. This non-discretionary standard is changed to a discretionary guideline (LINK G2). The FS has no credible biological basis for relaxing this provision. The FS also fails to provide a clear estimate of the frequency with which this provision will be violated, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use.	The consideration of LINK S2 as standard in some alternatives and as a guideline in others was done in order to better provide a range of reasonable alternatives. This allows the public a better opportunity to comment and allows the deciding official the opportunity to select that alternative that best responds to the issues. Comments such as this provide information to the deciding official regarding any concerns with the differences between alternatives. Thank you for your comments.

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149	25	64000	VEG S5. The FS has no credible biological basis for exempting livestock grazing or recreation and administrative sites from this standard [VEG S5]. The FS also fails to provide a clear estimate of the frequency with which these exceptions will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use. Without extensive analysis of these considerations, and the inclusion of biologically defensible parameters on its use, the FS cannot include these exceptions in the lynx amendment.	This standard pertains only to pre-commercial thinning and therefore is not pertinent to livestock grazing management. Standards and guidelines associated with livestock grazing are contained elsewhere in the alternatives. We understand that the inclusion of the statement: "This standard does not apply to: 1: Livestock grazing practices and activities." may have led to some confusion.
149	28	64000	GRAZ S1-S4. All of these non-discretionary grazing standards are replaced with discretionary guidelines (G1-G4). The FS has no credible biological basis for relaxing these provisions. The FS also fails to provide a clear estimate of the frequency with which these provisions will be suspended, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of their use.	The consideration of Graz S1-S4 as standards in some alternatives and as guidelines in others was done in order to better provide a range of reasonable alternatives. This allows the public a better opportunity to comment and allows the deciding official the opportunity to select that alternative that best responds to the issues. Comments such as this provide information to the deciding official regarding any concerns with the differences between alternatives. Thank you for your comments.
204	4	64000	Livestock Grazing Management Activities and Practices; Retain as written in Alternative D	Comment noted.
64	33	65000	In Tables 3-F1 to 3-F3 (pages 3-97 to 3-98), it appears that the acreage of potential fuels reduction projects could be substantial if resources and other factors permit but are limited to 611,000 acres (Table 3-F3).	This is an incorrect interpretation of the information presented in Tables 3-F-1 to 3-F-3 (FEIS Tables 3-17- 3-18). Tables 3-17 and 3-18 quantify the amount of lynx habitat adjacent to

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64	34	65000	Clear definitions are needed with regard to the geographical extent of the WUI. Tables 3-F1 and 3-F3 provide data showing lynx habitat for WUIs within one mile and three miles, and the effects on lynx habitat could potentially increase an order of magnitude if a three-mile treatment zone is used for communities at risk (270,000 versus 2.2 million acres).	communities at risk. The analysis then details probable amounts of fuels treatment in lynx habitat and the anticipated effects of the alternatives on lynx habitat and national forest management activities. The definition of WUI used for the FEIS analysis is the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101.)
86	3	65000	Landowners in potential wildlife areas should be responsible for performing any fire reduction activities on their own property. It should not be the U.S. government's responsibility to assure fire safety for individuals who desire to live and build residences in areas of potential fire hazard. The fire issue in general is handled on an adequate basis in alternative B.	Comment Noted. The responsibility of landowners to perform fuels reduction treatments on their own property was acknowledge in the DEIS and SDEIS and FEIS.
95/22; 127/22	22	65000	DEIS does not consider that catastrophic natural disturbances, such as the recent fires and ongoing insect epidemics in the covered national forests, may result in conditions where large portions of the landscape may be unsuitable for long periods of time. On the other hand, managing landscape conditions through active management may help avoid catastrophic disturbances and result in a more stable flow of lynx habitat over time.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat.
95/21; 127/21	21	65000	GTR RM-254 states, "approximating the natural disturbance frequency and spatial patterns present on the landscape is expected to provide the best habitat for lynx". Yet nowhere in the DEIS is there any analysis of natural disturbance frequency or spatial patterns, a comparison to current disturbance frequency and spatial patterns, or direction for desired disturbance frequency and spatial patterns.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat.
106	44	65000	Given that the majority of ponderosa pine forest exists in the Laramie Park	Comment Noted. The analysis discusses the anticipated

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			Unit of the Medicine Bow National Forest, where the proposed lynx amendment will not apply, and given that ponderosa pine in general has not been identified as suitable habitat for lynx, it is unclear how the USFS could possibly conclude and unnatural fire risk exists on the MBNF or that fuels reduction treatments are even necessary throughout the majority of the forest.	effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat. Non lynx habitat such as ponderosa pine is not addressed in this analysis.
106	41	65000	Not only is the notion of total control of firebrands absurd, especially since crown fires are more associated with drought and extreme fire weather rather than vegetation structure (Baker 2003), but it seems to promote the idea that it is appropriate for people to construct homes in forest lands without metal roofs or other fire-safe constructions features. The USFS should be promoting fire wise construction, rather than taking responsibility for individuals that choose to ignore fire wise construction methods. As a taxpayer, it disturbs me that the USFS would even think of taking such a responsibility, especially given the liability ramifications associated with this position.	This is an incorrect interpretation of the information presented in the analysis. The analysis specifically states that there are multiple purposes for hazardous fuels treatment in the wildland urban interface, one of which is reducing the threat to structures. The analysis recognizes that the success of fuels treatments in the WUI is based on several factors outside the control of the national forests. These factors are as follows: <ul style="list-style-type: none"> ▫ clearance between the actual fuels and the residence or personal property is the responsibility of the property owner, in accordance with state law, ▫ design and choice of construction materials for the residence or structure is the owners responsibility, and ▫ even though all preventive measures to protect the structures are in place, the actual fire behavior under severe conditions that threaten the home or structure could still be outside the control of the Forest Service.
106	45	65000	Given that spruce/fire and lodge pole pine forests in the Southern Rockies are naturally shaped and influenced primarily by stand-replacing fires (Baker and Kipfmuller 2001), we question why the USFS would want to alter this natural fire regime? The DEIS indicates the USFS desires to create conditions more conducive to low intensity surface fires. Yet, this seems to be nothing more than a perpetuation of irresponsible and ecologically unsound fire suppression. At least, the USFS's desire to manage forests in the Southern Rockies in such unnatural ways seems only to threaten the ecosystem that the threatened lynx depends upon.	Comment noted, however we were unable to locate the section in the DEIS cited by the commenter stating our "desire" to alter the natural fire regime and create conditions more conducive to low intensity surface fires. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities such as hazardous fuels reduction that alter the characteristics that influence crown fire initiation and spread.
106	43	65000	Even if thinning or logging could have any measurable impact on fire risk or behavior, given the natural ecology of the Southern Rockies, it appears the USFS's claims regarding fire risk are grossly overstated. At the least, spruce/fir and lodge pole pine forests throughout the Rocky Mountain Region appear to pose the least risk to homes and communities. For instance, according to the FEIS prepared for the Revised Medicine Bow	Comment noted. Condition class and fire hazard are not interchangeable terms in long return interval fire regimes such as lodgepole pine and spruce/fire habitat types. While areas may be condition class 1 they may also have a high fire hazard rating. See also revised VEG S1 in the FEIS.

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			National Forest Land and Resource Management Plan, all lynx habitat is within Condition Class I, meaning the forest is within the historic range of variability and the risk of losing key ecosystem components is low.	
126	9	65000	Even if the lynx protection provided in Alternative E were adequate to restore lynx, there is no assurance that those lynx protections will be implemented. Exemptions for fuel treatment work: The Forest Service provides no definition of "fuel treatment work" other than to offer an example, and thus it provides no assurance that these exemptions will not harm lynx. In fact, the Forest Service acknowledges that they may: "Allowing fuel treatment projects may results in adverse effects...vegetation standards that allow fuel treatment may result in adverse effects".	The Southern Rockies Amendment did not include an Alternative E. Comment noted, A fuel treatment is a type of vegetation management action that reduces the threat of ignition, fire intensity or rate of spread, or is used to restore fire-adapted ecosystems. Vegetation management projects change the composition and structure of vegetation to meet specific objectives, using such means as prescribed fire or timber harvest. The analysis specifically states that there are multiple purposes for hazardous fuels treatment in the wildland urban interface, one of which is reducing the threat to structures. The analysis recognizes that the success of fuels treatments in the WUI is based on several factors outside the control of the national forests.
126	18	65000	The Forest Service states there is a concern that protecting lynx habitat may increase the risk of wild land fire, and thus a "fuel treatment" exemption is needed. Yet, its own analysis finds that there is little overlap between the areas at risk of catastrophic fire and lynx habitat.	Comment Noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national forest management activities such as hazardous fuels reduction that alter the characteristics that influence crown fire initiation and spread. The extent of the "fuels treatment exception" has been modified in the preferred alternative F. Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest).
134	4	65000	Lynx tend to avoid areas of forest near human communities - it therefore is illogical to state the necessity of logging for "fuel treatment" in lynx forest areas as these woods are not near human homes.	Comment noted Tables 3-F-1 and 3-F-2 (DEIS, SDEIS) [Tables 3-17 & 3-18 FEIS] quantify the amount of identified lynx habitat adjacent to communities at risk. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat
149	11	65000	Specific Examples of Problems with the Preferred Alternative: "Fuel treatments identified though a process such as that described in A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy Implementation Plan." This exception gives the FS exceptional latitude to employ the	Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities

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			<p>exception anytime "fuel" is "treated" (i.e., virtually any project the FS ever undertakes) if the project is "identified" (an undefined term) in a "process" (another unidentified term) "such as" the one mentioned (i.e., a process that the FS deems similar enough to the "A Collaborative Approach..." process to trigger the exception). This amounts to the virtually unlimited ability to exempt projects across the region from the conservation provisions otherwise adopted in this amendment. This exception if of further concern to us because we have noticed a remarkable increase in the proportion of projects the FS describes, at least in part, as involving fuels treatments. A cynic might conclude this is because the FS now has expanded legislative latitude with respect to projects it can explain in this way. Indeed, any project that involves removing wood (e.g., any logging project) might be described as a fuels treatment project regardless of its likely effectiveness at actually reducing the risk of fire impacts to homes and communities. The FS fails to provide any biological basis for this exception, any clear estimate of or parameters on the frequency with which it will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of its use. Without extensive analysis of these considerations, and the inclusion of biologically defensible parameters on its use, the FS cannot include such an exception in the lynx amendment.</p>	<p>within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101.</p>
149	10	65000	<p>Specific Examples of Problems with the Preferred Alternative. This critical standard is gutted by extensive and unjustifiable exceptions. They include: "Fire Use practices and activities that restore ecological processes." DEIS at S-5. "Fire Use" practices are defined by the DEIS as "[t]he combination of wildland fire use and prescribed fire applications to meet resource objectives." DEIS at Glossary p. 5. This exception is both improperly permissive and unnecessary. It would appear that virtually any fire activity could be characterized as falling under the rubric of this exception. This is problematic enough, but the FS then fails to provide a reasonable analysis of the extent to which this exception will be used, nor does the FS set any sort of limits or other parameters on its use. Consequently the FS cannot assess the likely impacts of this exception in a manner sufficient to meet its NEPA duties because it doesn't know what the impacts will be. We are also unclear on the need for such an exception. A relatively small amount of the acreage in need of fuel reduction is found in lynx habitat. This is apparent in comparing Table 3-WL-1, DEIS at Ch. 3 p. 11, which shows a total of over six million acres of total suitable lynx habitat on the national forests affected by the proposed amendment, with Table 3-F1, DEIS at</p>	<p>Comment noted . In the FEIS the exceptions for Wildland Fire Use and wildfire suppression have be modified. With the exception of Objective VEG O3 that specifically concerns wildland fire use, the vegetation Management activities and practices (VEG) objectives, standards, and guidelines do not apply to wildfire suppression, wildland fire use, or removal of vegetation for permanent developments such as mineral operations, ski runs, roads, and the like.</p>

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			Ch.3 p. 97, which shows only 269,771 acres of lynx habitat within one mile of communities at risk. Either this sweeping and unlimited exception is not needed, or the FS intends to do a great deal more under this exception than the DEIS suggests.	
208	2	65000	The fuels reduction aspects of the Healthy Forest Restoration Act allow up to 50% of the fuels reduction projects to occur in non-WUI areas. This could potentially spell disaster for lynx and lynx habitat. Only those fuel reductions within identified WUI's should be exempt from lynx habitat management standards and guidelines.	<p>Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG S6 apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101</p>
224	2	65000	Biologists are not forest managers and their plans to eliminate operations like pre-commercial thinning are ill founded. Stagnant, fire-prone stands will result.	<p>Comment Noted. In the final FEIS, preferred Alternative F, Standard VEG S5 applies to precommercial thinning practices and activities, except for fuel treatment projects that use precommercial thinning as a tool within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation:</p> <p>Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest).</p>
246	45	65000	Standard VEG S4. [The DOI] support[s] VEG S4 Conditions 1,2,3, and 4 under Alternatives B and C. However, the defensible fuels profiles	Comment noted. Condition class and fire hazard are not interchangeable terms in long return interval fire regimes such

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			language should be deleted from exemption in Alternative C. The defensible fuels profiles language is too vague, and could be applied to any vegetation management action, anywhere on a forest, and at any time. The Department believes that use of this language and process undermines the adequacy of the regulatory mechanism for maintaining adequate denning habitat across the landscape.	as lodgepole pine and spruce/fire habitat types. While areas may be condition class 1 they may also have a high fire hazard rating.
246	16	65000	We do not understand the need for the exemption for fuel treatment projects proposed under the collaborative fuels treatment process from the requirement to maintain more than 30 percent suitable lynx habitat (VEG S1) or 10 percent denning habitat (VEG S3) within a lynx analysis unit (LAU).	<p>Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101</p>
246	17	65000	We do not understand the need for the exemption for fuel treatment projects proposed under the collaborative fuels treatment process. We also do not understand the need to change the limit on rate of change in lynx habitat over time from a guideline to a standard (VEG S2 under Alternative B to VEG G7 under Alternatives C and D). None of these measures proved problematic for Forest Service or BLM management proposals since lynx were listed, with few exceptions.	Comment Noted. The alternatives were developed to display a range of potential management actions. In the FEIS the preferred Alternative F contains a modified which applies to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National

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				Forest). There are multiple purposes for hazardous fuels treatment in the wildland urban interface, one of which is reducing the threat to structures. Fuel treatment projects around and within communities are performed to reduce fire hazard, and thus reduce the potential damage to community resources and increase the safety of the public and firefighters
246	20	65000	By definition, condition class 1 forests are not outside their historic range of variability for fire and have not "missed" a fire cycle. Typically, condition class 1 forests are represented by high elevation spruce/fir and lodgepole pine habitat types, where infrequent, severe fires occurring every 100 to 200 years are normal. Such forests comprise lynx habitat. As these forests have not "missed" a fire cycle, there is no unnatural buildup of forest fuels that need to be treated. Therefore, the Department questions why condition class 1 forests are not specifically excluded from an exemption that allows fuel treatment projects to go forward without adherence to lynx standards.	Comment noted. Condition class and fire hazard are not interchangeable terms in long return interval fire regimes such as lodgepole pine and spruce/fire habitat types. While areas may be condition class 1 they may also have a high fire hazard rating.
246	18	65000	The DEIS on pages 38-40 concludes that VEG S1, S2, and S3 would have very limited effects on fuel treatment projects. Very few LAUs currently have conditions that approach limits imposed by these standards. Therefore, we assume proposals would infrequently be constrained by the standards. Yet under the proposed language for or absence of these standards in Alternative D, the potential for substantive negative impacts to lynx habitat would be contained in plan direction.	Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)
79	1	65200	Pg S-6 Alt B Vega S1 - I'm not sure this [is] worded correctly. It reads like nothing is going to change except that the Fire Usage Plan will allow the FS to exceed the 30% unsuitable habitat limit. This is a common theme throughout this part of the document. Practically any activity can be tied to the reduction of fuels. The exemption of the Fire Use Plan from the LCAS could lead to further fragmentation and degradation of lynx habitat than is allowed by the LCAS.	For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit
106	36	65200	The USFS appears to be proposing an "exception" to lynx protection measures in order to implement "fuel reduction" treatments. This exception gives the USFS exceptional latitude to employ the exception anytime "fuel" is "treated" (i.e., virtually any project the FS ever undertakes) if the project is "identified" (an undefined term) in a "process" (another unidentified term) "such as" the one mentioned (i.e., a process that the FS deems	

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			similar enough to this one to trigger the exception). This amount to the virtually unlimited ability to exempt projects across the region from the conservation provisions otherwise adopted in this amendment.	route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101
95/43; 127/43	43	65200	VEG S1. Another is allowing Fire Use practices and activities "that restore ecological processes to proceed, without any explanation of what constitutes restoration of ecological processes. Most timber sale projects are designed, at least in part, to "restore ecological processes" or "improve long-term forest health"; these projects should therefore similarly qualify for an exception. Rather than implement a standard that restricts management, this Standard should identify a desired level of early successional and late successional forest conditions by major plant community that national forests should strive to achieve in order to provide optimum lynx habitat.	Comment Noted. See revised VEG SI in FEIS preferred Alternative F.
100	2	65200	fuel reduction projects to reduce the threat of wildland fire in accordance with the National Fire Plan and the Grand County Fire Plan must continue to protect our at risk communities.	Comment noted. The amendment is designed to allow fuels projects that protect communities at risk to occur.
106	37	65200	The USFS appears to be proposing an "exception" to lynx protection measures in order to implement "fuel reduction" treatments. We have noticed a remarkable increase in the proportion of projects the USFS describes, at least in part, as involving fuel treatments. A cynic might conclude this is because the USFS now has expanded legislative latitude with respect to projects in can explain it in this way. Indeed, any project that involves removing wood (e.g., any logging project) might be describe as a fuels treatment project regardless of its likely effectiveness at actually reducing the risk of fire impacts to homes and communities.	<p>Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101</p>

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106	38	65200	The USFS appears to be proposing an "exception" to lynx protection measures in order to implement "fuel reduction" treatments. The USFS fails to provide any biological basis for this exception, any clear estimate of or parameters on the frequency with which it will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of its use. Without extensive analysis of these considerations, and the conclusion of biologically-defensible parameters on its use, the FS cannot include such an exception in the lynx amendment.	<p>Comment noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat. The amendment is designed to allow fuels projects that protect communities at risk to occur.</p> <p>WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101</p>
106	40	65200	Although the USFS claims that firebrands could still be transported long distances and ignite homes, making it necessary to conduct "fuels reductions" miles away from homes and communities, we find it difficult to believe that the USFS should be responsible for controlling firebrand dispersal. As it is, the USFS seems to be placing itself in an untenable situation and potentially setting up a liability lawsuit against the agency.	The analysis states that there are multiple purposes for hazardous fuels treatment in the wildland urban interface, one of which is reducing the threat to structures. Reducing spotting potential and production of fire brands can reduce the risk to structures, especially if the zones of treatment are wider than the spotting distances possible at critical weather levels (i.e. 97th percentile weather).
207	1	65200	Pg S-6 Alt B Vega S1 - I'm not sure this worded correctly. It reads like nothing is going to change except that the Fire Usage Plan will allow the FS to exceed the 30% unsuitable habitat limit. This is a common theme throughout this part of the document. Practically any activity can be tied to the reduction of fuels. The exemption of the Fire Use Plan from the LCAS	The Interagency Wildland Fire Use Implementation Procedures Guide (May 2005) states that "Wildland Fire Use, based on Federal Fire Policy direction is a direct component of wildland fire management. It is a management action equal to wildfire suppression and thus constitutes an emergency

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			could lead to further fragmentation and degradation of lynx habitat than is allowed by the LCAS.	
211	13	65200	Many of the vegetation standards in alternatives B and C include exemptions for "Wildland Fire Use" and "wildfire suppression". The CWF recognizes that these exemptions are designed to provide management flexibility to the USFS for wildfire activity. However, we do not believe that the effects of the Wildland Fire Use exemption has been sufficiently analyzed in the DEIS. We recognize that attempting to analyze the effects of implementing the exemption is difficult at best. However, without providing limits on it as a management tool, adverse effects will likely occur at some unquantified level. Therefore, it would be difficult if not impossible to determine overall effects of the exemption and the ability of the alternatives to maintain persistence of lynx in the SRMGA. Absent some semblance of a spatial analysis, we assume that significant portions of habitat connectivity may be lost.	action".
211	14	65200	"Defensible fuels profile's)" is defined in the glossary of terms, but the application of this strategy appears to be arbitrary in nature. Also, the effects of using this strategy/exemption have not been disclosed in the DEIS. We recognize that attempting to determine the effects of implementing this strategy across the SRMGA would be a large and difficult task at best. However, we do not believe that it is in the best interest of lynx to provide this exemption/strategy through this amendment. Rather, we suggest that this strategy be implemented at the project level where a site-specific amendment would be required to ensure adequate protection for the lynx.	<p>Comment noted. The analysis discusses the anticipated effects of the alternatives on lynx habitat and national Forest management activities in lynx habitat.</p> <p>In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG S6 apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in</p>

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				condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101
82	1	65400	Proposing elimination of precommercial thinning to increase Lynx habitat without considering the other implications such actions could have on overall forest health is taking a very short-sighted and dangerous view of a much more complex interaction of the forest community.	The effects of reducing precommercial thinning on forest health are analyzed and discussed in the FEIS, Chapter 3 under Forest Resources.
95/50; 127/50	50	65400	VEG S5. According to GTR RM-254, "Thinning stands early to maximize tree growth potential can be compatible with snowshoe hare and lynx habitat needs provided that stands are thinned before snowshoe hares recolonize the area." This proposed Standard fails to recognize the benefits of precommercial thinning for lynx habitat conditions through a) reducing self-pruning and consequently maintaining limbs along more of the tree length for a longer period of time, thus increasing hiding cover and b) providing conditions that enhance the growth of shrubs that provide valuable forage.	Appendix F notes the criteria for lynx habitat and noted climax lodgepole pine should not be included as vegetation contributing to lynx habitat. Not all timber types are included as vegetation contributing to lynx habitat. During site specific project planning mapping may be updated to reflect the site specific conditions. The FEIS includes updated information in the Forest Resources - Timber Management section.
95/48; 127/48	48	65400	VEG S5. There are a number of opportunities to provide for snowshoe hare habitat and still do thinning that are not addressed. The following should be considered to the situations in Standard VEG S5 where precommercial thinning is allowed. - Stands that are not dense enough to quality as hare habitat but could be thinned to increase tree growth and vigor. - Leave islands of unthinned trees in areas where precommercial thinning is desired. - Thin stands in mosaics of small patches while leaving areas unthinned. - Thin areas using variable densities throughout the area, ranging from optimum for tree growth to no thinning. - Thin the stands before they reach above the snow level. - Thin stands at a density that is greater than the silviculturally optimum, but which will not so drastically reduce growth. - The area being considered for thinning has an abundance of winter hare habitat and thinning will improve the long-term mosaic of different structural stages. - Since there is ongoing research addressing stand density and hare use, include an exception where new information shows that the thinning will improve or not adversely affect hare habitat.	Stands that do not meet lynx habitat criteria could be considered for thinning activities. The best available information would be reviewed as site-specific project analyses are underway.
106	39	65400	If the USFS is truly serious about protecting homes and communities, then the agency should focus on conducting modest thinning within 100-200 feet of individual homes and at most a quarter mile around communities. This method of home and community protection, which has been developed and promoted by USFS researches, has been found to be the	Treatments of fuels within the structure ignition zone (with 200 feet of structures) only are not sufficient to reduce the threat to neighborhoods and individual structures. During fire events in mixed severity and stand replacement fire regimes, firebrands may be carried long distances, and fires that start

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			most affective in protecting homes and communities.	in and around homes can ignite structures. As there is no mechanism to require homeowners to engage in efforts to reduce the threat adjacent to their homes, they will continue to be at risk without management of the surrounding fuels. Fire prevention programs and Community Fire Safe Counsels are valuable tools in communicating to the public the need for clearing and maintaining fuels away residences and structures, assisting residences in coordinating local hazard reduction efforts, and educating individuals on less flammable building designs and construction materials.
106	42	65400	The USFS seems to be implying through the DEIS that thinning and other mechanical treatments of the forest can actually have a measurable impact on fire risk and/or intensity. This position is at least scientifically unsupported and at most seems to represent an attempt by the USFS to weaken lynx protection measures to justify increased timber harvesting.	We disagree. There is a wealth of peer reviewed scientific studies that support the effectiveness of fuels treatments in reducing fire severity.
126	20	65400	The Forest Service states there is a concern that protecting lynx habitat may defer pre-commercial thinning, which may cost jobs. Yet, the Forest Service's own analysis projects almost no difference in jobs and income between Alternative B and Alternative E.	The effect of thinning on commercial timber sale volumes will not happen for many decades – well beyond the 2007-2011 analysis timeframe used in the employment and income analysis. The implication of potential commercial timber sale volume upon the timber industry many decades from now is speculative at best, and therefore not addressed. The benefits and costs of future commercial timber sale volume are addressed, however, in the Financial/Economic Efficiency subsection. Note: This analysis does not include an Alternative E, comment is understood to refer to Alternative D.
147	3	65400	You have failed to display the impact of the proposed elimination of precommercial thinning on the long term sustained yield of the National Forests involved. All the trained foresters within the Forest Service that I have talked with about this acknowledge that there must be an impact, but they don't really know what it will be. They all guess that it might not have a substantial impact on the short term timber sale programs – but they don't know. You must analyze and display what the impact will be each forest's ASQ.	The Forest Resources analysis has been updated. Analyzing the maximum allowable sale quantity (ASQ) over a 10-15 year period for the individual forests was not determined necessary. Forest health issues were reviewed and long term sustained yield impacts were estimated and updated effects are disclosed in the Forest Resource section in Chapter 3 of the FEIS. The effect of thinning on commercial timber sale volumes will not happen for many decades – well beyond the 2007-2011 analysis timeframe used in the employment and income analysis. The implication of potential commercial timber sale volume upon the timber industry many decades from now is speculative at best, and therefore not addressed. The benefits and costs of future commercial timber sale volume are addressed, however, in the Financial/Economic

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				Efficiency subsection.
168	5	65400	BRC supports modification of Standards and Guidelines that will allow mechanical treatment for aggressive restoration. Additionally, BRC suggests modifying Standards that allow pre-commercial thinning and salvage to occur without the "micro-management" present in the original Preferred Alternative (Alternative B).	Comment noted.
216	3	65400	While Alternative D more responsibly constrains annual pre-commercial thinning acreages over the No Action alternative, we do not applaud or quietly accept USFS Region 2 preferred Alternative D and it's recognized impacts on decreasing the probability of lynx persistence when compared to the more responsible provisions of Alternative B or C.	Comment noted.
246	31	65500	We recognize the need for some flexibility in the use of wildland fire due to the unpredictable nature of when and where the activity would be initiated. However, in the absence of a broad-scale assessment to determine natural disturbance regimes, such flexibility should be limited to lessen potential adverse effects on lynx consistent with the LCAS.	Comment noted. The Interagency Wildland Fire Use Implementation Procedures Guide (May 2005) states that "Wildland Fire Use, based on Federal Fire Policy direction is a direct component of wildland fire management. It is a management action equal to wildfire suppression and thus constitutes an emergency action.
4	2	66000	The proposed elimination of precommercial thinning in lynx habitat will have more significant effects on the long term management, outputs and health of the National Forests than are disclosed or analyzed in the DEIS. Over 80% of the suitable timber acres in the affected National Forests have been included in Lynx Analysis Units. Despite the uncertainties about silvicultural techniques to provide short-term and long term snowshoe hare habitat, the proposed restrictions on precommercial thinning will reduce the growth of saw timber by as much as 89% and contribute to long-term risks of insects and disease and fire.	The Forest Resources analysis has been updated. LTSY analysis was updated with updated information from the Forests. Analyzing the maximum allowable sale quantity (ASQ) over a 10-15 year period for the individual forests was not determined necessary. Forest health issues were reviewed and long term sustained yield impacts were estimated and updated effects are disclosed in the Forest Resource section in Chapter 3 of the FEIS.
67/2; 70/2; 217/3; 218/3		66000	There has been a lot of publicity in regards to the Canadian Lynx and the CDOW's efforts to introduce it into Colorado, but the bottom line is that the Canadian Lynx shouldn't be the determining factor in how we manage our Forests. Our Forests should be managed for the health of the Forest, first and foremost, consistent with President Bush's Healthy Forest Initiative.	Comment noted.
83	3	66000	Protecting the lynx might as well mean stop all management to all Colorado forest land. Stop all access to the forests. Stop recreation. Stop timber management. Stop hazardous fuel reduction. Stop all habitat improvement. Let everything wait to burn or die. An unhealthy forest doesn't benefit the people of Colorado, the wildlife of Colorado, or the visitors that come to Colorado to see the vibrant forests and wildlife. Amending the current forest plan for one species will only lead to more	Comments noted. Effects to management are disclosed in Chapter 3 of the FEIS.

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			forest problems, more fires, and possibly the loss of current Colorado species that will be affected by these forest problems and fires.	
117	16	66000	Include a section on Forest Health effects in Chapter 3 in addition to the Timber Section which focuses on timber outputs.	The Forest Resources section in Chapter 3 has been updated to include updated forest conditions and anticipated effects to forest health.
117	2	66000	A related weakness of this analysis is that it does not accurately display the current affected environments of the National Forests in regards to forest health. Most of these Forests are suffering from drought stress and insect and disease epidemics. Many Forests are currently experiencing catastrophic outbreaks of insects in the very forest types which have been identified as lynx habitat. The spruce beetle outbreak is of particular concern. The extensive landscape level spruce mortality which is occurring the lynx habitat, along with the associated increased risk of catastrophic fires in the future are and will be changing the habitat components deemed important for lynx. The current condition of the spruce forests of Utah which have been ravaged by spruce beetles are a likely scenario for the spruce forests of the Southern Rockies. The effects of forest health and forest health risks on lynx habitat management should be included in the analysis.	The Forest Resources section in Chapter 3 has been updated to include updated forest conditions and anticipated effects to forest health.
117	11	66000	A weakness of the LCAS is that it did not address current forest health issues or affects to lynx over the long term. To make up for this weakness please add and analyze for an additional risk factor of Forest Health - including drought, insect, disease, and the increased potential for catastrophic wildfire in the EIS. This should include an assessment of the effects of management activities or the lack of management activities on lynx and lynx habitat over the short term and long term.	The Forest Resources section in Chapter 3 has been updated to include updated forest conditions and anticipated effects to forest health.
177	3	66000	We see no reason why "defensible fuels" reduction should occur with no limitations. Very little lynx habitat is within 200' of a structure, or even within 600'. The fictional "forest health crisis" is rarely an excuse for backcountry fuels reduction, since the high elevation spruce fir forests have a fire regime that is much longer than the length of time that we have been suppressing these fires.	Comment noted.
95/42; 127/42	42	66100	VEG S1. Another is that historical succession and disturbance processes are the same for each forest type. It is quite possible that with the large fires that occur in lodgepole pine, more than 30% of an LAU may be not suitable for a period of time but still be consistent with objective VEG 01. This standard assumes the disturbance processes are the same for each forest type. It is quite possible that with the large fires that occur in	Comment noted. The best available information was considered for this analysis. Site-specific analyses will continue to incorporate new information as it becomes available.

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			lodgepole pine, more than 30% of an LAU may be not suitable for a period of time but still be consistent with objective VEG 01. This standard assumes the disturbance processes are the same for each plant community, and they are not. For example, the normal disturbance process in spruce-fir are generally small and would rarely exceed 30% standard, although the current spruce bark beetle epidemics may be a significant exception.	
95/53; 127/53	53	66100	VEG S5. Implementation of similar direction based on the LCAS has already led at least one national forest in Colorado to develop silvicultural prescriptions for overstory removal of lodgepole pine from a suppressed understory of sub-alpine fir, which sounds a lot like "cull-tree release". The Forest Service should not embrace poor silvicultural practices, even with the intention of providing lynx habitat.	Comment noted.
117	18	66100	VEG S4 does not allow the flexibility to deal with forest health treatments.	Comment noted.
126	61	66100	We urge the FS to use fire instead if logging or thinning wherever possible, because of its proven effectiveness over other methods. Wildfire was the disturbance mechanism that created and maintained lynx foraging areas historically, so it is likely to be our best tool to restore these areas today. Only where fire is not an option due to other management constraints may logging be appropriate as the next-best alternative to create similar conditions, provided it is carefully designed to do so. Research has shown that there are significant differences between fires and clear cuts that imitate logging, mostly concerning the time required before the areas are productive foraging habitat: hares reoccupy severely burned areas within 15 months, small mammal populations are "drastically reduced immediately following clear cut operations", and hares may not recolonize clear cuts until 6-7 years after cutting, and may not reach high densities for 20-25 years.	Comment noted. Forest Plans include management direction for appropriate use of fire and multiple resource use goals.
148	5	66100	The fundamental premise of this USFS advertising strategy is that short (70 years or less) fire cycles and small scale wildfires contribute to "forest health" and reduce the incidence of large scale fires. This argument can be plausibly made for some lower elevation ponderosa pine forests but this niche is dominated by coyotes and bobcats, lynx are competitively excluded. In lynx habitat, higher elevation lodgepole and spruce/fir forests, fir cycles are long (1-3 centuries) and infrequent blazes catastrophic. This successional pattern has been exhaustively documented by studies of the Yellowstone fires of 1988. Promoters of "forest health" imply that clearing tactics can make high elevation lodgepole-spruce/fir behave like mid	Comment noted.

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			elevation ponderosa pine with it's politically fashionable fire regimen. This suggestion that millions of years of ecological evolution can be silviculturally reengineered is utterly preposterous. Equally irresponsible is the failure to acknowledge that "forest health" management of typical lynx habitat would actually aggravate wildfire ignitability by encouraging grass growth, enabling ORV trespass and the proven fire hazards of mechanized logging (1996 Sierra Nevada Ecosystem Project).	
89	5	67000	Given the fact that no surface disturbing activities will be permitted without NEPA compliance, and Section 7 consultation as part of the NEPA compliance, as required under the Endangered Species Act, the Forest Service will have many opportunities to work with the USFWS to develop localized measures to protect the species. A localized, project-specific approach to mitigation is much preferred by the energy industry.	As identified in the FEIS management activities and practices that were found not to be a threat to lynx populations are provided as guidelines. Energy mineral activities would be analyzed for the effects on lynx on a case-by-case basis and the standards and guidelines applied at the project level. (SDEIS, page 184).
89	3	67000	We also urge the agency to develop more flexible guidelines and management tools that will not have the severe impacts on existing and future energy activities in Lynx habitat. Clearly, given the fact that considerable commercial activities have been in place for many years within these habitat areas, valid existing rights must be taken into full consideration.	Comment noted. As identified in Table 2-1 (Description of Action Alternatives) of the SDEIS, the applicability of Standards and Guidelines on All Management activities and practices is subject to valid existing rights.
89	4	67000	We firmly believe there are scientifically based measures that will ensure the compatibility of energy exploration and development with adequate protection of the Canada Lynx and its habitat without resorting to a one-size fits all approach that severely limits opportunities to explore for and develop these resources. It is necessary for such measures to be fully explored and explained in the Final Environmental Impact Statement (FEIS).	The SDEIS/FEIS has analyzed the effects of the Lynx Amendment on the energy (leasable) mineral resources in the Southern Rockies area. (see pages: SDEIS 184-192, and Minerals section in Chapter 3 of the FEIS) Alternative D provides the greatest range of flexibility for energy resource activity, while contributing to the conservation and protection of lynx and lynx habitat. Action Alternatives B, C and F in FEIS do not include the exception/exemption for fossil fuel exploration and development activities and practices, and energy transmission facilities.
149	12	67000	Specific Examples of Problems with the Preferred Alternative. "Fossil fuel exploration and development practices and activities." Id. This exception, surprisingly, is even more expansive than the two described above. The FS includes absolutely no limits (e.g., the project in question doesn't even have to be described in any sort of process or document) on its use other than that it be a fossil fuel project. In other words, fossil fuel projects are entirely exempted from the protective provisions of this lynx amendment without limitation. The FS fails to provide any biological basis for this exception, any clear estimate of or parameters on the frequency with	Alternatives B, C and F do not include the exemption of fossil fuel exploration and development. See Table 2-1 in the FEIS.

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			which it will be used, any parameters on the size of projects that can be exempted in this way, nor any parameters on the overall extent of its use. Without extensive analysis of these considerations, and the inclusion of biologically defensible parameters on its use, the FS cannot include such an exception in the lynx amendment.	
165	3	67000	The worst provision though is to allow oil and gas exploration and development in a Lynx recovery area. I have seen firsthand 3D-seismic on Padre Island National Seashore and it was not a pretty sight. There the land was relatively flat so damage was minimal compared to what would have to be done in our mountainous environment. Executive Order 13212 is nothing more than an attempt to give Bush Administration cronies a land grab on our public lands. I have looked at the USGS maps and there is not enough oil and gas in any of the effected areas to justify this sort of intrusion. Keep in mind this is not "Government Land", but rather public land that belongs to all of us, not the oil and gas companies. I also don't buy the "multiple use" argument because oil and gas drilling in our mountainous environment would make it essentially useless for anything even approaching wilderness or Lynx recovery habitat.	Comment noted. Decisions affecting the leasing of land for oil & gas exploration and development are made at the Forest level through the implementation of Forest Land Management Plans. Leasing decisions have already been made for the affected forests. Your comment is beyond the scope of this analysis.
204	8	67000	The extraction of our mineral and energy resources is vital to the strength of our nation, and the maintenance of our standard of living.	Comment noted.
84	2	67100	All alternatives and management prescriptions must be to valid existing rights for oil and gas leasing and conditions of approval that are in place for approved projects. In many cases, oil and gas leasing, drilling activity and production wells and operations have been on-going for decades. PAW believes this fact, coupled with the continued existence of the Canada Lynx and Lynx habitat in areas where these economic uses are located, demonstrates existing processes work and should be left intact.	As stated in the DEIS/FEIS, implementation of the standards and guidelines is subject to valid existing rights, for all mineral activities, permits, and authorizations. See Table 2-1 and page 184 in the SDEIS and Table 2-1 of the FEIS.
84	3	67100	Instead of closing large areas of the Wyoming Over thrust Belt to leasing, agencies should keep these areas open to leasing and use the tiered environmental analysis process already in place to carefully evaluate proposed projects for their potential effect to Canada Lynx, identify mitigation measures, and monitor the effectiveness of these mitigation measures after project implementation.	Decisions regarding oil and gas leasing are addressed at the individual Forest level through the implementation of the Forest Land Management Plan. Individual project leasing decisions are not addressed in this Amendment.
86	4	67100	The primary concern with alternative D is the issue of fossil fuel exploration and development activities. Though fairly "glossed over" in the draft EIS, these activities could be highly disruptive to lynx recovery. Again, it appears the USDA is performing an EIS just to interject and executive order into an already existing recovery plan.	See SDEIS, Chapter 3, <i>Lynx Conservation and Assessment Strategy - Risk Factors</i> (page 65). The Final Rule for the lynx, published July 3, 2003, states that specific management activities and practices termed "risk factors", such as fire exclusion, grazing, and human uses that create snow

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				compaction, were not threats to the overall population of Canada Lynx.
89	2	67100	We recommend that the Forest Service more fully address the impacts of the proposed management of the Canada Lynx on commercial uses of the NFS in order to adequately formulate appropriate protection measures. Specifically, PLA is concerned that more detailed analysis of the cumulative effects of Lynx management must be conducted with respect to oil and gas leasing, existing and future exploration and development activities, including conditions of approval (COA) that may be imposed on applications for permits to drill (APDs).	Decisions affecting the leasing of land for oil & gas exploration and development are made at the Forest level through the implementation of Forest Land Management Plans. Leasing decisions have already been made for the affected forests. Analysis for APDs and SUPOs, including any COAs are determined on a project-specific basis at the Forest level and are beyond the scope of this analysis.
148	3	67100	In spite of long-enduring commercial exploitation of the two forests with which I'm most familiar, Medicine Bow and Pike/San Isabel, I can't think of an active or historic oil/gas location in either one. What point is there in implicating lynx as an impediment to energy development in forests where there is no oil and gas?	Comment noted. The application of this Lynx Amendment is for more than one or two forests, where potential for occurrence varies from low to high. Whether the potential occurrence for energy minerals is low or high, the potential impacts and effects of implementing the lynx amendment need to be addressed.
167	1	67100	Daily news reports show concerns over the Iraqi oil fields. Iraq has an estimated reserve of 112 billion barrels of oil. 320,000,000 barrels of oil is possible from a single source of rock the San Juan Mountains- That is 1/350th of Iraq's reserves. Not a lot of oil, but well worth exploring on or own soil. Let's drill and test the potential of domestic energy resources and bring our troops home. If not, the next body bag could be delivered to our hometown.	Comment noted.
149	13	68000	"Energy transmission facilities and associated practices and activities." This exception is problematic. It allows the unlimited suspension of the protective provisions of the lynx amendment for any and all projects that fall under the "energy transmission facilities" rubric.	While the exception under Alternative D would allow for energy transmission facilities and associated practices and activities to occur within areas of habitat connectivity, any proposals would have to adhere to all applicable laws and regulations and be examined through and environmental analysis process.
237	8	68200	All of the snow survey sites we maintain are actually through cooperation with NRCS. A map of those locations can be acquired through NRCS. Specific concerns from a quick review are: AK00F3 – near Collbran, may impact dam safety and reservoir administration. Late winter/early spring snowmobile travel to reservoirs on Grand Mesa.	Access to permitted sites within the Lynx habitat would be reviewed on a case-by-case basis to determine the best timing, duration, location, number of visits, etc. and would continue to be available along designated routes.
64	89	70000	Greater discussion of overall socioeconomic effects should be in the Final EIS.	The economic and social effects section has been revised. Narratives addressing recreation, timber, and fuels reduction have been added.

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101	3	70000	We as citizens don't need to lose any more rights to access the forest, by any method.	Comment noted.
109	18	70000	This DEIS is a perfect example of government over-reaching it's authority into the lives of citizens. Most people probably support the attempts to save the lynx as a species. They will not support saving the lynx if the costs are too great - which is what this DEIS sets forth.	Comment noted.
221	5	70000	Using public lands as a privilege, not just a right and the Colorado taxpayers deserve decisions based on a good stewardship.	Comment noted.
117	20	70520	Please expand the social and economic effects assessment to include the impacts of the alternatives on the counties with high minority populations and little economic well being. The effects of limiting commercial winter recreation opportunities to these communities with so little economic base may be significant. By analyzing the entire region as a whole, these effects and environmental justice issues by not be apparent.	Recreation use effects have been re-examined, with a conclusion that that no change in recreation use should be anticipated across alternatives. Consequently, adverse impacts stemming from recreation to any population or community are not expected. The environmental justice (minorities and low income populations) section has been revised for the FEIS.
5	7	73000	No private grant money should be spent on this power-usurping travesty [management of the Canadian Lynx] - it makes our government agents into hirelings of the Foundation Crowd, billionaires in control of public lands and interfering in the lives of the public.	Comment noted.
81	2	73000	The Forest Service's job is to manage our National Forests. Being dictated by other entities defining your job, is only postponing your ability to do your job. You are paid to manage the National Forests with our hard earned tax dollars. Please, work as hard for me as I do for you.	Comment noted.
185	1	73000	I believe, if we consider our federal budget deficit, that spending \$'s on the reintroduction of any and all non-revenue generating species in inappropriate. Also, as you know, most of the species are unwanted by the majority of the people.	Comment noted.
64	90	74000	The DEIS ignores discussion of important economic impacts from recreation in Colorado National Forests, which are heavily visited for hiking, wildlife observation, hunting and fishing, winter skiing and snowshoeing, and motorized summer and winter recreation. Forest recreation provides the primary economic base for many, probably most, mountain communities.	The quantity and quality of recreation use has been re-examined and revised in the FEIS. However, effects on recreation use remains unquantified, and thus cannot be incorporated into either the economic impact or efficiency analysis. The narratives accompanying each economic analysis have been revised to better explain why recreation is not explicitly included.
204	9	74000	You will act in accordance to the duties of your position and protect the economical viability of our national forests and enhance the financial and recreational benefits to our nations citizens.	Comment noted.

LTR_NO	Com#	CODE	COMMENT	RESPONSE
109	11	75100	We simply cannot implement any of the alternatives without knowing what they will cost. The table on DEIS page 150 grossly understates the financial impact of the forgone precommercial thinning as a result of implementing these proposals. The cost of even one small wildfire sparked in a doghair lodgepole stand shows these numbers to be absurdly low - and what about all the other costs of lost opportunities on agriculture land, on improved highway safety, on recreation improvements, on any building or development or uses in any land in Colorado? Those are what this DEIS affects. The DEIS is grossly inaccurate by omitting all these costs.	The effects of each alternative to probable losses by wildfire in the Wildland Urban Interface have been addressed in the Fuels, Fire and Fire Ecology section of the FEIS. There is no question that changes in fuels reduction projects have the potential for sizable economic consequences. Because specific locations of fuels reduction treatments are beyond the scope of this analysis and cannot identified for the FEIS, meaningful economic benefits and costs cannot be estimated. Under Alternatives D and F, such treatments are neither limited nor prohibited.
109	10	75100	The DEIS fails to disclose the costs and trade-offs for implementation as required by NFMA and NEPA. There is no disclosure in this DEIS of the costs to Colorado for implementing these practices which affect all land in the state. DEIS Page 149 defines what economic efficiency and efficiency calculations and PNV are, but it does not in any way show these for the effects this DEIS will have on the economy of this state.	Consequences of each alternative on other land owners, public and private, has been re-examined and narratively addressed in the FEIS. Effects of each alternative on the economy of Colorado are addressed in the employment and income analysis. The effects are negligible.
202/4; 110/4	4	75100	Apparently it is OK to use "fire use" activities to restore ecological processes and maintain or improve lynx habitat, but the EIS may prohibit or limit practices of thinning and fuel load reduction that will increase safety for firefighters and rural communities. It is deeply disturbing that the well being of an animal may have more significance in forest management plans, than the safety and well being humans. It is unacceptable to have enormous risk and costs of containing wildfires when there are efficient, cost-effective management practices that can aid in preventing these catastrophic wildfires. The CWGA appreciates the time and effort the Forest Service has put in to developing the draft EIS, and hopes that the final EIS will address these concerns.	The effects of each alternative to probable losses by wildfire in the Wildland Urban Interface have been addressed in the Fuels, Fire and Fire Ecology section of the FEIS. There is no question that changes in fuels reduction projects have the potential for sizable economic consequences. Because specific locations of fuels reduction treatments are beyond the scope of this analysis and cannot identified for the FEIS, meaningful economic benefits and costs cannot be estimated. Under Alternatives D and F, such treatments are neither limited nor prohibited.
77	16	99999	Summary of a Review of Lynx Behavior and Ecology and Its Application to Ski Area Planning and Management, Final Report. 2000. Roe et al.	The "Roe Report" was reviewed for the analysis, even though it is not a research paper, nor peer-reviewed scientific literature. Both the "Roe 'Report'" and the DEIS analysis acknowledge the lack of evidence regarding snow compaction and competition, either supporting or refuting the hypothesis. The DEIS Chapter 3, page 18 stated "Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that "Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of

LTR_NO	Com#	CODE	COMMENT	RESPONSE
				maintaining and restoring habitat for lynx and their prey." (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging. Dispersal travel movements may be much different.
126	47	99999	Attachment B. Excerpts from the U.S. Fish and Wildlife Service Remand Decision that assume and support implementation of the Proposed Action (Alternative B).	Comment noted.
126	84	99999	"Although localized habitat conditions have improved [in Maine], reoccupation of these areas may be impeded by barriers to lynx immigration, such as paved roads with high-volume traffic , non-forested agricultural habitats, or other intervening areas of suitable habitat."	Comment noted.
126	83	99999	"Within the contiguous United States, the lynx population is divided regionally by ecological barriers consisting of unsuitable lynx habitat".	Comment noted.
126	81	99999	"In Canada, management of forest lands and conservation of wildlife habitat varies depending on Provincial regulations".	Comment noted, this is outside the amendment area.
126	80	99999	"Recolonization of suitable lynx habitat within the State of Washington eventually may be precluded by the fragmentation of habitat and potential isolation from the lynx population in Canada".	Comment noted, this is outside the amendment area.
126	79	99999	We cannot assume that lynx populations in the contiguous United States will be maintained by dispersal of lynx from Canada.	Comment noted.
126	82	99999	"Loss of suitable habitat Canada lynx reduces the potential for population growth or recolonization of the lynx and further confines lynx to smaller, more isolated units (Weaver 1993)".	Comment noted, this is outside the amendment area.
126	71	99999	"Increasing human access into Canada lynx habitat has increased the vulnerability of Canada lynx to both legal and illegal harvest in areas that, historically, were relatively isolated from humans".	Comment noted, this is outside the amendment area.
126	70	99999	"Blocks if suitable habitat, both public and private, are often dissected by extensive networks of paved roads".	Comment noted.
126	69	99999	"Lynx will use some types of roads for hunting and travel (Koehler and Aubry 1994).	Comment noted.
126	76	99999	"Numerous reports describe coyotes accessing high-elevation, deep snow areas by moving along paths, roads, and snowshoe hare trails".	Guidelines under Human uses management activities and practices address compacted snow issues.
126	62	99999	General principles that must be addressed in landscape management plans if harvesting of fire disturbance.	Noted.

LTR_NO	Com#	CODE	COMMENT	RESPONSE
126	30	99999	"The remainder of this section describes some important concepts used throughout the following analysis".	Comment noted.
126	29	99999	"... plaintiff's contend that our determination that "[c]ollectively, the Northeast, Great Lakes and southern Rockies do not constitute significant portion of the range of the DPS"	Comment noted.
126	28	99999	"On December 26, 2002 the Court issued its memorandum opinion and order."	Comment noted.
126	27	99999	"A Conversation Agreement between the U.S. Forest Service and [U.S. Fish and Wildlife]".	Comment noted.
126	64	99999	The likelihood of highway crossings by resident lynx can be expected to vary among home ranges according to proximal habitat conditions.	Comment noted.
126	67	99999	"The likelihood of lynx encountering people has dramatically increased over the last few decades".	Comment noted.
126	66	99999	As is the taiga, we found little evidence that roads represent a significant disturbance.	Comment noted.
126	65	99999	...bobcats in Wisconsin selected home ranges with lower densities.	Comment noted.
148	9	99999	Attachment A - Comments provided to USFS by Mr. Dick Scar, Buena Vista, Colorado regarding travel management on the Leadville and Salida Ranger Districts, San Isabel NF	Comments noted.
149	62	99999	Wildlife Underpass (Lynx) Monitoring Research Study Request For Task Proposal	Proposal noted.
149	61	99999	Statewide Relationship Between Potential Lynx Movement Corridors and CDOT Projects	Map noted.
149	63	99999	Lynx Habitat Mapping and Formal Endangered Species Act Consultation	The mapping process for lynx habitat was disclosed in Appendix F of the DEIS an SDEIS.
149	64	99999	Response to the Northern Rockies Lynx Amendment Draft Environmental Impact Statement	Comments in response to the Northern Rockies Lynx Amendment are addressed in that analysis.
159	7	99999	[Untitled Topographical map showing area near Lizard Head Meadows.]	Noted.
179	1	99999	"Southern Rockies Lynx", recommendations for management of. E-mail forwarded from Rick Hammel.	Noted.

Comments and Response to Comments for the S. Rockies Lynx Forest Plan Amendment SDEIS

Table 4 SDEIS Comments and Responses

Resource	Letter Number	Comment Number	Comment	Response
Alternative Support	09	01	The Association would certainly like to see the No Action Alternative A implemented. The success of the Canada Lynx population in southwest Colorado lends credence to keeping forest management status quo.	Comment noted.
Alternative Support	10	01	I strongly support no action alternative A. The lynx are apparently doing well as it is, and they have hundreds of thousands of acres that are already off limits to motorized vehicles. If it ain't broke, let's not try to fix it with more rules and regulations.	Comment noted.
Alternative Support	11	01	In comment to the supplemental DEIS for the Southern Rockies Canada Lynx Amendment. I would very much like to see the No Action Alternative A implemented. From what I've seen in the mountains, heard from others and read about, the Lynx seems to be adapting and settling in quite well. If the Lynx is to become established here in Colorado they should be allowed to do it without us rearranging forest activities for them.	Comment noted.
Alternative Support	12	01	We are an organization of 2500 motorized recreation enthusiasts who depend on public land access in Colorado. We also care about the sustainability of our historic wildlife populations and their habitats. We support Alternative D, the Forest Service Preferred Alternative. We feel this alternative and its associated management guidelines allow for both responsible resource development and public uses to occur, especially while critical lynx reintroductions and recoveries are taking place.	Comment noted.
Alternative Support	16	04	The Colorado Forestry Association opposes all of the USFS forest plan amendment alternatives	Comment noted.
Alternative Support	17	01	We support Alternative A. To change the Forest management to suit the lynx is out of line.	Comment noted.

Resource	Letter Number	Comment Number	Comment	Response
Alternative Support	23	01	Mineral County does not support any of the alternatives but believes the No Action Alternative does the (least) harm. Locking up the National Forest even further by introducing a foreign species is just not right. This is especially so when there is no designated critical habitat in Colorado. We support timber management on suitable timberlands and pre-commercial thinning is essential for a healthy forest. We are tired of seeing sawmills disappear because there is no timber to cut. In a county that is 95% federal lands, we believe that multiple-use is important for our economy. We include here not only timber production, but livestock production, recreational opportunities, and watershed protection	Comment noted.
Alternative Support	24	01	<p>We are the Colorado Off-Highway Vehicle Coalition (COHVCO), an organization that represents all forms of motorized recreation across Colorado whose members are enthusiasts who depend on public land access in Colorado. We also care about the sustainability of our historic wildlife populations and their habitats. We support Alternative D, the Forest Service Preferred Alternative.</p> <p>We feel this alternative and its associated management guidelines allow for both responsible resource development and public uses to occur, especially while critical lynx reintroductions and recoveries are taking place.</p>	Comment noted.
Alternative Support	27	04	The SDEIS identifies Alternative D as the preferred alternative for the amendment. Based on negotiations between the USFWS and the Forest Service, resulting in the development of Alternative F, it was our understanding that the Forest Service intended to move forward with Alternative F as their preferred alternative. We believe that if the Forest Service does intend to go forward with Alternative F as the preferred alternative, the SDEIS should have provided the details of the development and contents of Alternative F, as well as a full analysis of its effects.	Comment noted. Alternative F will be analyzed in the FEIS. Informal consultation efforts were ongoing at the time of the SDEIS analysis.

Resource	Letter Number	Comment Number	Comment	Response
Alternative Support	28	05	We maintain that the Forest Service should adopt a slightly modified Amendment (<i>Alternative</i>) B. In fact, we do not believe that the other action alternatives (C or D) are legal alternatives as a result of their insufficient protections for lynx and lynx habitat, and, in particular, their severe departure from the recommendations of the lynx biologist team that prepared the LCAS. Consequently, the Forest Service must adopt an alternative that offers protections no weaker than those found in the current Alternative B and should, in fact, improve Alternative B in several key respects.	Comment noted.
Alternative Support	29	01	Grand County is still in support of Alternative D, which allows for fuels reduction projects, maintaining recreational values, and necessary infrastructure maintenance to be addressed at the local level. It addresses the needs of the lynx but allows for flexibility to address our local situations and concerns.	Comment noted.
Fuels	02	03	The fuel treatments for reducing wildland fire 10-year plan (which are not WUI projects adjacent to communities)... will cause unacceptable adverse effects to lynx. This action needs to be included in the Veg S5 standard and not exempt.	<p>Comment noted In the FEIS the exceptions for fuels treatments in the WUI have been modified in the preferred alternative F. Standards VEG S1, VEG S2, VEG S5, and VEG apply to identified vegetation management practices and activities, except for fuel treatment practices and activities within the wildland urban interface (WUI) as defined by HFRA, subject to the following limitation: Fuel treatment projects within the WUI that do not meet Standards VEG S1, VEG S2, VEG S5, and VEG S6 may occur on no more than 3 percent (cumulatively) of lynx habitat on each administrative unit (a unit is a National Forest)</p> <p>For the analysis Wildland urban interface (WUI) is defined as the area adjacent to an at-risk community that is identified in the community wildfire protection plan. If</p>

Resource	Letter Number	Comment Number	Comment	Response
				there is no community wildfire protection plan in place, the WUI is the area 0.5 mile from the boundary of an at-risk community; or within 1.5 miles of the boundary of an at-risk community if the terrain is steep, or there is a nearby road or ridgetop that could be incorporated into a fuel break, or the land is in condition class 3, or the area contains an emergency exit route needed for safe evacuations. (Condensed from HFRA. For full text see HFRA § 101.
Fuels	09	05	Once again as private land bumps into public lands fire and insect infestations become not just a danger to the forest but now to the public in general. We fully support any and all practices that ensure the continued health of the forests and surrounding grasslands.	Comment noted.
Fuels	12	02	We think it is critical that our forests are managed to reduce fire risks, and also to manage the forest stands to create or maintain the vegetative mosaics necessary for quality lynx foraging and denning habitats.	Comment noted.
Fuels	24	02	We think it is critical that our forests are managed to reduce fire risks, and also to manage the forest stands to create or maintain the vegetative mosaics necessary for quality lynx foraging and denning habitats.	Comment noted.
Fuels	29	02	Fuels reduction projects are very important to our communities in the hopes of reducing catastrophic wildland fire. The ability for the local forest to make management decisions related to fuels reduction projects and the Lynx Conservation Assessment and Strategy is of utmost importance in expediting such projects	Comment noted.
Heritage	04	01	We recommend that you coordinate your National Environmental Policy Act (NEPA) studies with the studies required under Section 106 of the National Historic Preservation Act. According to 36 CFR 800.8 of Section 106, "Federal agencies are encouraged to coordinate compliance with Section 106 and the procedures in this	This amendment provides management direction and does not propose ground disturbing undertakings at this time. Coordinating NEPA and NHPA compliance is standard a operating procedure for the Forests for the Rocky

Resource	Letter Number	Comment Number	Comment	Response
			part with any steps taken to meet the requirements of the National Environmental Policy Act.” Also, Section 11 0 of the National Historic Preservation Act states that Federal agencies should “coordinate with the earliest phases of any environmental review carried out under the National Environmental Policy Act.” The findings from the Section 11)6 studies can inform the NEPA studies, such as including mitigation measures identified under Section 106 into the NEPA decision document. Once we receive the Section 106 studies, we will be able to fully complete our reviews under both Section 106 and NEPA.	Mountain Region. Individual project level analyses proposing ground disturbing undertakings will follow Section 106 of the National Historic Preservation Act.
Miscellaneous	15	01	I strongly urge you to Adopt Alternative B (the proposed action) and not Alternative D (the preferred alternative). I do not want any action to be taken that would limit the chances of survival for these allusive animals.	Comment noted.
Miscellaneous	21	01	We have reviewed the SDEIS and the comments from the Intermountain Forest Association. We endorse the comments from the Intermountain Forest Association in their entirety.	Comment noted.
Miscellaneous	26	07	In closing, I feel there is a need to incorporate new information and make This document more realistic for use in the forest planning process that most forests are currently undergoing.	Comment noted. Information updates were incorporated into the FEIS analysis.
Miscellaneous	32	01	EPA will not be providing detail comments on the SDEIS. Our previous letter, dated April 29, 2004, commenting on the DEIS, outlined our detailed concerns and comments on the DEIS and the four alternatives. These four alternatives are included unchanged in the SDEIS.	Comment noted. Responses to original comments provided in DEIS table.
NEPA	02	01	The amendment and the analysis changed the proposed action (alt.B) in the original EIS to the preferred alternative (alt. D) in this supplemental DEIS. We are concerned that the new preferred Alternative D fails to adequately recover and protect Canada Lynx in the So. Rockies. The SDEIS fails to give a scientific (reason) (provide the analysis) for choosing Alternative D as the preferred alternative. Since this alternative decreases the probability of lynx	Alternative B reflected the proposed action that was sent out in scoping. Alternative D was the preferred alternative at the time of the release of the DEIS January 2004. The FEIS analyzes all the alternatives considered for the amendment. Effects to lynx were discussed in were analyzed and disclosed in the DEIS, SDEIS and

Resource	Letter Number	Comment Number	Comment	Response
			persistence compared to alternative B, we fail to see a justification for choosing this alternative D as the preferred action. This seems contrary to ESA and NFMA direction, and also violates (NEPA) as being arbitrary and capricious. Alternative D is also not in the public's best interest as the majority of the public in the recovery area support full recovery of the lynx.	included in the FEIS.
NEPA	02	05	Allowing projects to deviate from one or more lynx standards with just a "written determination" with no analysis violates ESA, NFMA, and NEPA and is unacceptable. Also, to allow deviation from an S2 standard because "it may result in short-term adverse effects to lynx, but will have a long-term benefit" is unacceptable. There is no scientific reason for allowing short-term adverse effects; (it) violates NEPA until this lynx population is recovered and taken off of the TES list.	Comment noted. The ALL S2 standard was not a part of Alternatives A, B, or C. An additional Alternative F was developed that does not include this standard.
NEPA	22	02	Finally, as an overarching matter, we are concerned that the Forest Service has essentially already implemented the proposed alternative, without completing an analysis and decision as required by NEPA.	The Forest Service is working with the Conservation agreement until the amendment to provide regulatory direction is in place.
NEPA	22	04	<p>The Forest Service and US FWS biologists have developed and approved Lynx Analysis Unit (LAU) maps, which operationally designate the lands within the Southern Rockies that the Forest Service intends to manage as lynx habitat. However, the Forest Service has neither provided an opportunity for public review and comment on the maps nor completed a NEPA analysis and made a decision on the designation of the LAUs. Without an opportunity for public review and comment, and a NEPA decision, the Forest Service's apparent "decision" to manage 7,451,341 acres of national forest lands in the Southern Rockies as lynx habitat is arbitrary.</p> <p>The Forest Service should complete a review of the LAU mapping in light of the critical habitat designation and the Forest Service's MUSY and NFMA obligations, then provide the public with an opportunity for review and comment, and make a NEPA decision regarding lynx</p>	<p>Resource mapping is an assessment of conditions. Resource mapping was completed by the appropriate specialists, wildlife biologists, with local knowledge of each National Forest.</p> <p>For the NEPA decision, the public had opportunities to comment on the amendment during scoping period and comment periods for the DEIS and SDEIS.</p> <p>LAU mapping review is appropriate during site specific analyses.</p>

Resource	Letter Number	Comment Number	Comment	Response
			habitat.	
NEPA	22	07	h) The SDEIS does not discuss whether or not the proposed forest plan amendments are significant or non-significant, leading us to conclude that the Forest Service plans to treat these amendments as "non-significant". We do not agree that the proposed amendments are "non-significant". Analyze the proposed forest plan amendments as significant forest plan amendments.	The FEIS in Chapter 3 contains substantial analysis, at the programmatic level, of the potential effects under each alternative of the management direction on other resource outputs and outcomes. The analysis is separated by national forest as appropriate. Any subsequent amendments or revisions will be done with opportunity for public participation through the NEPA process. An NFMA significance evaluation was completed and is documented in the FEIS and ROD.
NEPA	30	01	<p>The SEIS violates the Endangered Species Act by weakening protection of Canada Lynx and therefore should not be extended to Other Forests. We concur and expand on the statements made by the CNE Alliance that ALL S1and ALL S2 ensures that any protections provided by the lynx amendment can be readily suspended: "A project proposal that deviates from one or more lynx standards may proceed without amending the Plan, subject to ESA requirements . . ." if either of two conditions are met. DEIS at S-5. "Under this standard, the FS can suspend any other provision in the amendment simply by making a "written determination . . . that the project is not likely to adversely affect lynx" or by concluding that the project "may result in short-term adverse effects to lynx" but where "long-term benefits to lynx and its habitat would result." Id.</p> <p>The DEIS provides no explanation of or parameters for these written determinations (e.g., scientific standards to which they must be held, spatial scale at which the analysis must be conducted, whether any sort of analysis is required at all, etc.).</p> <p>The DEIS is similarly silent on the conditions under which the short-term vs. long-term conclusion must be made; it, too, fails to provide any explanation of or parameters for</p>	Comment noted. The ALL S2 standard was not a part of Alternatives A, B, or C. An additional Alternative F was developed that does not include this standard.

Resource	Letter Number	Comment Number	Comment	Response
			<p>these conclusions, such as the scientific standards to which they must be held, spatial scale at which the analysis must be conducted, whether any sort of analysis is required at all, etc. Indeed, the proposed language suggests that a project with severe short-term adverse effects might be permissible even if it produced only minimal long-term effect, since the provision does not even require a balancing of effects. As a result, CWA and RRF requests that the SEIS not be extended to the White River or Manti-La Sal National Forest, as its application to these species not only violates the ESA but will weaken the existing standards designed to protect Lynx.</p>	
NEPA	30	02	<p>The SEIS's Lynx Conservation and Assessment Strategy Violates the ESA and NEPA. The summary of the risk factors, provided in the SEIS, however, is devoid of any discussion of or even listing oil and gas development as a risk factor in Lynx survival.</p> <p>This omission ignores the dramatic impacts to Lynx and other wildlife habitat that oil and gas development have and will continue to bring to Forest Service lands in the West.</p> <p>The SEIS is devoid of any analysis of RFD and inaccurately accounts for all the potential impacts of oil and gas projects in inducing or facilitating the development of additional gas wells. Not only is this a violation of the National Environmental Policy Act's (NEPA's) requirement that the Forest Service accurately anticipate and analyze the impacts of its actions, but it under values the importance of Lynx habitat.</p>	<p>Comment noted. The ALL S2 standard was not a part of Alternatives A, B, or C. An additional Alternative F was developed that does not include this standard.</p> <p>Potential for leasable minerals was provided in the Minerals discussions in both the DEIS and SDIES, and carried forward into the FEIS. Impacts to lynx from minerals activities were considered in the wildlife analysis including effects to lynx.</p>
NEPA	30	03	<p>The SEIS Violates NEPA and NFMA by Failing to Adequately Analyze the Impact of Roads and Ecological Degradation. By fragmenting habitat, roads impose a significant threat to biological diversity. Habitat fragmentation associated with energy development projects is particularly deleterious in the context of rapid climate change. If organisms are prevented from migrating to track shifting climatic conditions, and cannot adapt</p>	<p>Effects to lynx habitat from anticipated activities, including roads, oil and gas and recreation impacts, were analyzed and disclosed in the DEIS, SDEIS and included in the FEIS.</p>

Resource	Letter Number	Comment Number	Comment	Response
			<p>quickly enough because of limited genetic variation, then chances for extinction increase.</p> <p>The preferred alternative in the SEIS, therefore, violates NEPA because it does not represent management of non wilderness and forest lands not recommended for wilderness with sufficient consideration of ecological values or protection of Lynx habitat. All parcels of land in the planning area —whether zoned as wilderness or for commodity production—should be managed in the holistic context of ecological systems. It cannot be argued that there are no direct ecological benefits associated with oil and gas development.</p> <p>Oil and gas development diminishes and destroys habitat, species, commercial and non-commercial recreational opportunities, aesthetic qualities, existence values, option values, and other ecological and recreational values. The preferred alternative in the SEIS must protect ecological values and mitigate harm to Lynx habitat.</p>	
Recreation	01c	01	<p>From my reading, Alternatives B and C have a standard that would limit, to some extent, the creation of new groomed or designated trails outside of existing compacted areas. Alternative D provides a similar guideline, rather than a standard, but it is less specific about how and where there would be a limitation of new groomed trails, and from my understanding, it is not very strongly worded. All of the alternatives do not directly remove or create a conflict with any existing groomed trails, even if they are within "good" potential lynx habitat areas. In my opinion this suggests very little conflict with the current snowmobile program groomed routes. I verified with Tom Metsa and Rick Storm, and they were unaware of any new snowmobile trails being planned in the White River N.F. at this time. The only complication could be the date and standard used to determine what an "existing" or "designated" trail is.</p>	<p>Comment noted. The monitoring item notes to map designated and groomed routes that occurred inside LAUS during the period of 1998-2000.</p>

Resource	Letter Number	Comment Number	Comment	Response
			They may only consider trails that existed before 1999 as "existing" for the purposes of the lynx conservation. (The FS) should further clarify definitions of "existing" and "groomed trails" to fully address any questions of when trails had to be created to meet these criteria.	
Recreation	01c	02	As was the case in 2004, there still is no detailed table or map of the 'consistently compacted areas' per lynx analysis unit. If this is to be the standard used for management, it would seem necessary to have a table of acres and detailed mapping of these areas. The USFS should include a table of acres of "areas of consistent snow pack" per lynx analysis unit in the Final EIS, as well as provide hardcopy maps of these areas and GIS mapping.	This information was provided in tabular format in the Recreation section in Chapter 3.
Recreation	05	01	Keep in mind: sustained yield, multiple uses and leave as many roads open as possible for recreation. Particularly leave private roads open.	Comment noted.
Recreation	06	01	<p>We believe trying to balance resource use in the San Juan National Forest and protect wildland habitat for lynx may not be truly feasible. With that in mind, we'd like to express our support of management practices which favor lynx reintroduction, proliferation, and habitat protection.</p> <p>We favor the long-term benefits of protecting wildland and habitats, versus the short-term private gain of timber, oil and gas, and other extractive interests. We also support non-motorized vs. motorized use in the national forests for the same reasons: minimizing impact on dwindling wild areas. We hope that the Forest Service will act as stewards, not as businessmen. We believe that is the real job of the agency.</p>	Comment noted. The lynx translocation program is being done by the State of Colorado, Division of Wildlife. The Southern Rockies Forest Plan amendment for lynx is a U.S. Forest Service (U.S. Department of Agriculture) effort. The two efforts are unrelated; the USFS would be amending the Forest Plans for lynx habitat regardless of the state's efforts.

Resource	Letter Number	Comment Number	Comment	Response
Recreation	09	03	However, we do recognize that Alternative A will not be seriously considered so CSA can support Alternative D with the following thoughts. As the sport of snowmobiling becomes more popular the amount of public land to travel on is becoming less available. Some of this is through forest revisions, some through the development of private lands adjacent to public lands and some through amendments such as this one. The “no net gain” portion of this amendment tightens an already tight belt. The local public land managers have the best knowledge as to what affect increasing snowmobile areas will have on lynx habitats, denning and linkage and they should have the final word on the increase/decrease that happens in their area. A multi-forest mandate will be ineffective in helping manage recreation and wildlife co-existence. Thus we would very much like to see the cap on expansion taken out of the amendment and guidelines given to local managers to determine what is appropriate. It is an unwise forest policy to keep making the accessible lands smaller while the population gets larger. Conflicts will increase, thus creating more and more occasion for crisis management instead of pro-active management.	Comment noted.
Recreation	09	04	All of us involved in outdoor recreation recognize that the health of the forests is an absolute to the enjoyment of public lands. The attractive qualities of Alternative D are the efforts made to allow local land managers to determine what is appropriate for the health of their area.	Comment noted.
Recreation	11	02	I am very curious as to the validity of research showing snow compaction i.e. skis, snowshoes, snow mobiles effecting snowshoe hare populations. It does look like a bit of a reach.	Comment noted. The LCAS identified snow compaction as a potential concern for competition. Measures are included to limit expansion of compacted snow areas.
Recreation	11	03	If Alternative A is not chosen, I would back Alternative D, allowing local public land managers to formulate plans for their areas makes a lot more sense than the other Alternatives. Restricting areas of use will start to create overcrowding in use areas and conflicts/problems.	Comment noted.

Resource	Letter Number	Comment Number	Comment	Response
Recreation	12	03	<p>Your draft document tends to single out motorized use as a potential recreation impact in certain project areas. We feel your references to recreation use impacts should be equally applied to all activities, i.e. hunting, hiking, climbing which tend to be more off-road, and dispersed area, backcountry oriented than motorized uses. The new travel management rules and decisions will have a tendency to keep motorized use on routes that can be designated away from critical lynx habitats. We look forward to being involved in these communications and collaborations as required.</p> <p>We also support our winter users and their recreation needs by asking for your continued concern to provide for adequate areas that allow for motorized snow play, snow country loop trips and trail access.</p>	Comment noted. The analysis focused on the threats initially identified in the LCAS. Updated clarification on the status of those threats lead to the change of some standards to become guidelines in alternatives to the proposed action.
Recreation	13	01	I have followed the lynx program since it started, as an outdoor enthusiast I am concerned that, first there was no involvement with the public prior to their initial release.	The lynx translocation program is being done by the State of Colorado, Division of Wildlife.
Recreation	13	02	Second that after seeing that they are not doing well, that attempts are being made to structure and tailor the habitat to them. The land in its current state, with usage unchecked should either be sufficient or cease to be the habitat of the lynx. It is not endangered and doesn't need the extraordinary protection of the forest service.	Comment noted. The lynx was listed as threatened by the US Fish and Wildlife Service, noting the lack of regulatory mechanisms as the reason for listing. This amendment is proposed to provide adequate regulatory mechanisms for providing lynx habitat.
Recreation	14	01	<p>As an avid recreationist I am concerned about the potential changes that may result from the Forest Services "management" of the Canada Lynx. Considering the importance of the urban interface/ wildfire situation, beetle killed forest and other more urgent concerns it would seem to me that the Forest Service really has a very easy decision here.</p> <p>Land management issues such as this as well as things such as roadless areas should be increasingly left to local land managers who know the situation best. Therefore I would support the "take no action" alternative or perhaps</p>	Comment noted.

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			the alternative D.	
Recreation	15	02	I think that increased snowmobile and ATV use is absolutely out of the question. Our National Forests are already overrun with these machines and there is no reason to allow them even close to critical habitat. I have seen how destructive ATVs can be in areas of Pike National Forest, e.g. Jones Park and Frosty Park. I have also witnessed the harassment of wildlife by snowmobilers in Yellowstone National Park almost every time we have gone there. While I think that the harassment in Yellowstone has been curbed in the past several years, monitoring it in Lynx habitat would, as a practical matter, be almost non-existent.	Comment noted. There is no critical habitat designed in the analysis area.
Recreation	15	03	I understand that non-motorized recreation might also be restricted. I think that is perfectly acceptable since it is so important to me to protect these beautiful animals.	Comment noted.
Recreation	15	04	I would prefer that there be no expansion of down-hill ski areas in Lynx habitat. However, I note that all alternatives leave open that possibility. Therefore, I hope that protecting critical habitat takes precedence over skiing and that any expansions are made in under the strict requirement of protecting said habitat.	Comment noted.
Recreation	19	02	HU1-6- Snowmobiles traffic constitute the primary HU threat to lynx in most areas	Comment noted.
Recreation	24	03	Your draft document tends to single out motorized use as a potential recreation impact in certain project areas. We feel your references to recreation use impacts should be equally applied to all activities, i.e. hunting, hiking, climbing which tend to be more off-road, and dispersed area, backcountry oriented than motorized uses. The new travel management rules and decisions will have a tendency to keep motorized use on routes that can be designated away from critical lynx habitats. We look forward to being involved in these communications and collaborations as required. We also support our winter users and their recreation needs by asking for your	Comment noted. The analysis focused on the threats initially identified in the LCAS. Updated clarification on the status of those threats lead to the change of some standards to become guidelines in alternatives to the proposed action.

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			continued concern to provide for adequate areas that allow for motorized snow play, snow country loop trips and trail access. Please reference the Colorado Snowmobile Association comments for their input on the Supplemental DEIS.	
Recreation	25	01	The Buena Vista Snowmobile Club supports the No Action Alternative A 100% but could also back Alternative D. We would ask that the “no net gain” concept of Alternative D be removed, and guidelines given to local land managers to determine what are appropriate. The local land managers would have the best knowledge as to what effect an increase in snowmobile areas would have on lynx habitat.	Comment noted.
Recreation	28	08	Adopt Alternative B with the following modification: Standard HU S1 must be strengthened to limit snowmobiles in lynx habitat to designated routes and play areas only, to allow no net increase in snowmobile routes or play areas in lynx habitat whether they are “designated” or not, and to actively reduce snowmobile routes and play areas where they are not known to be compatible with lynx restoration. The numerous exceptions detailed in the SDEIS (pp. 32-33) should be eliminated.	Comment noted.
Recreation/Wildlife	01c	03	When we reviewed this lynx amendment in 2004, there were a few studies being conducted to explore questions of lynx competition with other predators that may be increasing their range due to snow compaction. There were also questions of frequency of and concerns about lynx hybridization with bobcats. This amendment references none of these new studies, which might have important implications to this process. There were two multiyear studies being conducted, one in Utah and one in Montana, to try to explore the competition between lynx and bobcats/coyotes, which now have several years of data that should be considered. The Utah study published results in the Wildlife Society Bulletin in 2006 (“Potential Impacts of Coyotes and Snowmobiles on Lynx Conservation in the Intermountain West” Bunnell et al. 2006). This study documented increased coyote activity	The biologist reviewed available new information and updated the effects analysis accordingly in Chapter 3.

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			<p>within 350 meters of compacted trails. There are new studies about hybridization which indicate a fairly significant level of hybridization (15%) between lynx and bobcats ("Hybridization between Canada lynx and bobcats: Genetic results and management implications" Schwartz et al. 2004). Competition and hybridization are major concerns with lynx in Colorado if in fact snow compaction is creating significant overlap between lynx and other predators.</p> <p>(The FS) should update scientific reference information to adequately address lynx competition and hybridization issues:</p>	
Recreation/Wildlife	01c	04	There are two State Parks that have linkage paths or defined linkage areas within them. Those are State Forest and Arkansas Headwaters. There are no direct impacts from this EIS amendment on those parks, but we should be aware that they may later be designated as critical habitat for lynx.	Comment noted.
Ski Area	02	04	Ski Area permitted boundaries ...will cause unacceptable adverse effects to lynx. This action needs to be included in the Veg S5 standard and not exempt.	Comment noted.
Socio/Econ	19	03	HUS-3 How will monitoring and enforcement under Alt. B be accomplished with limited financing	Monitoring would be funded by affected units.
Socio/Econ and Timber	22	11	<p>c) The economic and land management impacts of prohibiting precommercial thinning are significant. The following paragraphs are from the Medicine Bow National Forest Plan Revision FEIS regarding the effects of the lynx standards on timber management (p 3 -5 84) :</p> <p>"Effects from lynx vegetation standard #5 would result in essentially no precommercial thinning within lynx habitat for an indefinite period.</p> <p>For those management areas where commercial timber production is a goal, reduced production of sawlog-sized material would occur. Lodgepole pine would be affected to the greatest degree. Elimination of thinning at a young age would likely deter stand progression to large stand structure, probably not moving beyond a 3C Habitat</p>	<p>The effect of thinning on commercial timber sale volumes will not happen for many decades – well beyond the 2007-2011 analysis timeframe used in the employment and income analysis. The implication of potential commercial timber sale volume upon the timber industry many decades from now is speculative at best, and therefore not addressed. The benefits and costs of future commercial timber sale volume are addressed, however, in the Financial/Economic Efficiency subsection.</p> <p>VEG S5 would reduce precommercial</p>

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			<p>Structural Stage.”</p> <p>The above discussion would apply to all of the Southern Rockies national forests if VEG S5 is applied as proposed, and would have significant long-term economic effects and significant cumulative effects. The effects are "reasonably foreseeable" and must be analyzed and disclosed. The proposed prohibition on precommercial thinning will also have a significant effect on long-term productivity, and represents an irretrievable commitment of resources, and should be fully analyzed and disclosed in the FEIS. Base the range of choices for precommercial thinning on conditions in the landscape, not just the area under consideration for precommercial, thinning.</p>	<p>thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.</p>
Timber	01a	01	<p>Colorado State Forest Service supports the ongoing efforts to recover lynx in Colorado. However, we are concerned about the effects that implementation of the proposed standards, especially Standard Veg 5, would have on long-term forest productivity. Standard Veg 5 limits pre-commercial thinning until regenerated stands no longer provide snowshoe hare habitat. Restricting thinning for this period of time, especially in lodgepole pine, will have very negative effects on future stand productivity. The Forest Service estimates a reduction in growth of sawtimber of as much as 89%. Application of this approach across the landscape will limit future management options, can increase the risk to insects, disease, and fire, and may limit achieving other important forest plan objectives. We recommend that the Forest Service either remove suited timberlands from lynx habitat management restrictions or allow precommercial thinning to continue. Lynx objectives are but one of the many</p>	<p>VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the</p>

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			<p>complex issues the US Forest Service must address through their planning process. Requiring all acres that may be placed under management to comply with lynx requirements ignores the need to plan at the landscape scale, does not mimic natural processes, and conflicts with multiple-use principles.</p> <p>The US Fish and Wildlife Service (USFWS) did not designate any Critical Habitat for Canada lynx in Colorado. The US Fish and Wildlife Service acknowledged that Colorado’s reintroduction effort is an important step toward recovery of lynx, but also determined “that the Southern Rockies does not have features that are essential to the conservation of lynx and require special management”. We urge the US Forest Service to refrain from application of narrowly focused management prescriptions that may have negative consequences over the long-term.</p>	<p>percent of the baseline acres that would be thinned.</p>
Timber	18	01	<p>We are a logging company, and we pride ourselves on doing quality work that takes all forest values into account. We are concerned about possible restrictions on timber management and especially pre-commercial thinning because of the Canada Lynx and its prey species, the snowshoe hare. We know that timber work and pre-commercial thinning specifically can be done in ways that benefit the lynx and its prey species, or it can be done in ways that are detrimental to the lynx and its prey species. The key is to give on-the-ground managers the tools they need to accomplish what needs to be accomplished.</p>	<p>VEG S1 limits vegetation management activities that reduce suitable lynx habitat in LAUs where more than 30% of the lynx habitat is in unsuitable condition. This standard is not expected to affect vegetation or timber management since none of the LAUs currently have more than 30% of the lynx habitat in unsuitable condition.</p> <p>VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS</p>

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				<p>compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.</p>
Timber	20	02	<p>Comments on the previous draft pertaining to timber management and more specifically precommercial thinning appear to have gotten inadequate consideration in the process of alternative development. Although the invitation to comment on the 2006 SDEIS states that comments submitted on the previous draft need not be resubmitted, the issue of precluding precommercial thinning continues to be a source of concern to forest managers on the GMUG NF.</p> <p>Standards established in the SDEIS limit the options available to silviculturists to manage for commercial timber development on suitable lands over the long term. The standards also limit the ability of managers to maintain healthy stands resistant to insects and disease. Specifically, VEGS5 and VEGS6 basically preclude precommercial thinning and therefore, eliminate a valuable silvicultural tool available for managing stand development and maintaining stand health in the lodgepole pine and spruce-fir cover types.</p> <p>The timber section of the Affected Environment in Chapter 3 does not fully consider the benefits of precommercial thinning. The discussion appears to down-play the potential effect of eliminating this important intermediate treatment. Another benefit of precommercial thinning not mentioned in the document is insect and disease control. While the control of mountain pine beetle through commercial thinning is briefly discussed it should be noted that precommercial thinning can also help avoid developing conditions that would put stands at risk for mountain pine beetle attack. Also, there is no mention of dwarf mistletoe impact.</p>	<p>The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.</p>

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			<p>Precommercial thinning has been historically used on the GMUG as a means to control the advance of this disease in the lodgepole pine cover type. Severe growth loss and deformity can result in the absence of managerial control. Precommercial thinning provides the opportunity to select better genetic characteristics in individual trees and improve long term stand characteristics in the process. Precommercial thinning could also contribute to improving foraging habitat for snowshoe hares by prolonging low crown retention in immature stands through density control.</p> <p>Under the Effects section of Chapter 3, the impact of limiting precommercial thinning activity considers Long Term Sustained Yield (LTSY). It is difficult to put the reduction in LTSY, displayed as an annualized percent, into perspective. However, focusing on the annual loss of volume 3,720 CCF/year under the preferred alternative, this number would represent about 15% of the total annual timber target on the GMUG. The percentage could actually be higher. Recent lodgepole pine sales on the GMUG show average volume/acre yields higher than the example used from the MBR NF.</p> <p>Precluding precommercial thinning from spruce-fir cover types is also undesired to timber managers. Although the need for this treatment is not as common as in lodgepole pine stands, it is unnecessary to prohibit the use of this treatment in every situation.</p> <p>To say that the effect of volume reduction would be masked by additional regeneration harvesting to create snowshoe hare habitat is misleading. Harvesting mature stands of lodgepole pine that are in need of treatment to establish regeneration would certainly be a benefit, however, establishing new, dense young stands that would not be properly managed to maintain health and growth rates sufficient to produce future commercial products would only exacerbate the problem for timber managers. It has been determined through analysis of critical habitat by the U.S. Fish and Wildlife Service that no critical habitat for</p>	

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			<p>Canada lynx exists in Colorado. This of course does not mean that habitat for other populations of Canada lynx should not be created or maintained. However, to limit the methods available to vegetation management specialists for responding to multi-resource needs by restricting the tools available to these specialists does not increase the potential for creating or maintaining better habitat for Canada lynx or their prey species.</p> <p>We strongly recommend that all verbiage limiting precommercial thinning be either removed, or replaced with guidelines that allow the manager to determine whether project level precommercial thinning is needed and the extent of effects from proposed treatments to snowshoe hare habitat.</p> <p>This would be done under consultation with the appropriate resource specialists, in particular timber managers and wildlife biologists. Eliminating such an important silvicultural tool without any flexibility is not a wise management decision.</p>	
Timber	02	02	<p>The SDEIS fails to provide for lynx productivity, mortality and movements (issue p-S3). The exemption of Veg S5 and S2 Standards is critical (because they) allow salvage harvest and regeneration harvest in lynx habitat which have been documented to have adverse effects to lynx.</p>	<p>VEG S1 limits vegetation management activities that reduce suitable lynx habitat in LAUs where more than 30% of the lynx habitat is in unsuitable condition. This standard is not expected to affect vegetation or timber management since none of the LAUs currently have more than 30% of the lynx habitat in unsuitable condition.</p> <p>Standards VEG S1 and S2 do not apply to salvage logging because salvage logging is generally done on areas already changed to a stand initiation structural stage by a disturbance. For example, after a stand replacing fire the resulting stand is already in the stand initiation condition. Salvage harvest does not create the stand initiation condition. Even if salvage harvest were to limit the ability of the forest to</p>

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				provide winter snowshoe hare habitat this would be taken into account in the 30 percent standard. If this were the case, those acres would be included in the 30 percent standard until the young regenerating forests provide winter snowshoe hare habitat.
Timber	21	02	The proposed amendments undermine the Forest Service's management obligations under the Multiple Use Sustained Yield Act and the National Forest Management Act. The Endangered Species Act does not trump those obligations. In particular, the proposed elimination of precommercial thinning will reduce long-term diversity, increase the long-term risks of forest fires and mountain pine beetle epidemics, make achievement of many forest plan Goals and Objectives impossible to achieve, and will drastically reduce timber sale outputs, especially in lodgepole pine.	The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative in Table 3-13. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
Timber	22	01	Further, the proposed prohibition on precommercial thinning will restrict future management options, limit achievement of numerous forest plan goals and objectives, and contribute to long-term increased risks of insects, disease and fire. e) The recommendations in the LCAS are just that - recommendations, and not hard and fast standards that must be applied in all cases. As stated on page 6 of the Conservation Agreement between the Forest Service and US FWS, "The FS agrees to review and consider the recommendations in the LCAS prior to making any new decision to undertake action in occupied lynx habitat." However, it appears that the Forest Service made a conscious decision to disregard the flexibility found in the Conservation Agreement, and has simply incorporated the recommendations to prohibit precommercial thinning word for word.	
Timber	22	09	Concerns regarding the science and application of the prohibition on precommercial thinning: The final rule listing the lynx as a threatened species stated that precommercial thinning is not done at a scale that is a threat to lynx	

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			<p>populations in the Southern Rockies. Specifically, the March 24,2000 Federal Register containing the Final Rule Listing the Canada Lynx as a Threatened Species, states the following, beginning on page 16070: Summary of Factors Affecting the Species - Factor A. The Present or Threatened Destruction, Modification, or Curtailment of Its Habitat or Range. Northern Rockies/Cascades and Southern Rockies. "We conclude that timber harvest activities and precommercial thinning may reduce the quality of snowshoe hare habitat and red squirrel habitat in local areas of the Northern RockiedCascades and Southern Rockies, and thus may negatively affect lynx at local scales. Furthermore, the large percentage of Federal lands in developmental status and managed for multiple use may, on local scales, conflict with lynx conservation. However, based on the large proportion of lynx forest types managed in nondevelopmental status compared to the proportion of managed lynx forest types affected, current regional effects of timber harvest and thinning appear to occur at levels that are not likely threatening the Northern Rockies/Cascades and Southern Rockies lynx populations."</p> <p>Nowhere in the SDEIS is there any discussion to refute the above statement. Therefore, we are puzzled as to why, as a minimum, the Forest Service would reduce levels of precommercial thinning below the 4,868 acres of annual precommercial thinning identified in Alternative A, the No Action Alternative,</p>	
Timber	22	10	<p>According to the SDEIS: most of the precommercial thinning occurs in lodgepole pine on National Forests in the northern part of Colorado and the Medicine Bow in Wyoming (SDEIS,Forest Resources). the lodgepole pine cover type makes up 20% of the total lynx habitat identified in the Southern Rocky Mountains (SDEIS p 121). 2,578,796 acres of suited timberlands are included in LAUs (SDEIS p 122). According to Regional Office staff, there are a total of 523,430 acres of lodgepole pine forest</p>	<p>The FEIS includes information on cover type within the suitable timber lands. Approximately 22% (400,000 acres) of the mapped lynx habitat that is suitable for timber production is in the lodgepole pine cover type. Approximately half of this mapped lodgepole pine (200, 000 acres) is actually lynx habitat where the lodgepole pine is seral to spruce and/or subalpine fir.</p>

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			type identified as suited timberlands in the forest plans for the Southern Rockies national forests. The SDEIS should, but does not, display how many of the 2,578,796 acres of suited timberlands in LAUs (see p 122) are lodgepole pine forest type.	
Timber	22	12	d) The mountain pine beetle epidemic in Colorado and Wyoming is creating younger age stands in many older forests and is improving hare habitat. This needs to be considered when addressing standards and guidelines for lynx habitat in an LAU. The management emphasis should be on creating large amounts of hare habitat in the mature lodgepole pine forests, not protecting small, insolated areas within the landscape from precommercial thinning.	The current mountain pine beetle epidemic was considered in the FEIS. The habitats associated with snowshoe hare are discussed in the wildlife section of Chapter 3.
Timber	22	13	Research is ongoing to determine the value of lodgepole pine to hares and lynx as the importance in not well understood in the Southern Rockies, yet a very rigid standard is being applied to young, dense stand of lodgepole pine.	This standard does not apply to non-lynx habitat such as xeric forests, typified where lodgepole pine is the climax species.
Timber	22	14	Incorporate the following into the analysis: -recalculate the volume reduction table at the top of p 128 as a percentage of ASQ, instead of LTSY -an analysis of the effects of the current mountain pine beetle epidemic on lynx populations and lynx habitat, and give the public an opportunity to review and comment on that analysis, before making a decision to amend the forest plans. -analyze the effects on lynx if all suitable timberlands were excluded from the LAUs and from Standard Veg 5 -analyze the effects of Veg Standard 5 on the Forest Service's ability to achieve forest plan goals and objectives -analyze the following clarifications or exceptions to proposed standard Veg 5: -stands that are not dense enough to qualify as hare habitat but could be thinned to increase tree growth and vigor. -using "daylight thinning" to improve tree growth while protecting hare winter habitat.	Comments noted. LTSY analysis was updated with updated information from the Forests. The Forest Resources - Timber Management analysis was updated to display updated information related to the current mountain pine beetle epidemic in the FEIS. This standard does not apply to non-lynx habitat such as xeric forests, typified where lodgepole pine is the climax species. Excluding habitat areas based on other land management designations was determined inappropriate as a mechanism to display how management direction would be incorporated to provide lynx habitat across the analysis area. Anticipated effects from incorporation of

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			<p>-leaving islands of unthinned trees in areas where precommercial thinning is desired.</p> <p>-thinning the stands before they reach above the snow level.</p> <p>-thin stands to a density that is greater than the silviculturally optimum, but which will not so drastically reduce growth.</p> <p>-since there is ongoing research addressing stand density and hare use, include an exception allowing thinning to be implemented when new information shows that thinning will not adversely affect hare habitat or will improve hare habitat.</p> <p>-stands can be precommercially thinned where there is an abundance of winter hare habitat and thinning will improve the long-term mosaic of different structural stages based on the Lynx Science Report and the LCAS for lodgepole pine, which discusses the size of areas affected by fires or percentage of areas that would be expected to be in an early succession stage, allow precommercial thinning when 30% or more of a landscape dominated by lodgepole pine is providing winter forage habitat for hares as a result of fires, insect and disease outbreaks, or timber harvest activities. Specifically, replace existing standard VEG 5, # 4 with -</p> <p>"Within a landscape dominated by lodgepole pine, when 30% or more is providing winter forage habitat for hares as a result of fires, insect and disease outbreaks, or timber harvest activities."</p>	<p>the proposed amendment are discussed by resource area.</p> <p>The FS consulted with the FWS and considered comments on the draft EIS documents in developing Alternative F. VEG S5 has been revised to incorporate flexibility in the event new information where a written determination states:</p> <p>"a. that a project is not likely to adversely affect lynx; or</p> <p>b. that a project is likely to have short term adverse effects on lynx or its habitat, but would result in long-term benefits to lynx and its habitat; or</p> <p>4. For conifer removal in aspen, or daylight thinning around individual aspen trees, where aspen is in decline."</p>
Timber	28	09	Adopt Alternative B with the following modification: The application of Standard VEG S5 must be expanded from only pre-commercial thinning to include all vegetative management projects that reduce winter snowshoe hare habitat;	Comment noted. The FS consulted with the FWS and developed Alternative F in response to comments received on the DEIS to provide adequate management direction.
Timber	30	06	Although the DEIS is devoid of any information about logging and clearing of vegetation, it is clear that such activity will take place under the preferred alternative during construction and for clearing a 100 foot right of way due to the level of surface disturbance authorized in that	Vegetative management standards and guidelines are included in the amendment with anticipated effects discussed in Chapter 3. Future individual projects will address proposed ground disturbing

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			<p>alternative. See e.g., DEIS at iv and 114. Further, the Forest Service admits that such activity will significantly alter elk, deer and riparian habitat and other forest uses by providing that “The WRNF would change the existing management areas of MA 5.43-Elk Habitat and MA 5.41-Deer and Elk Winter Range to MA 8.32-Designated Utility Corridor within the 8.2 miles on the WRNF at a width of 100 feet. The GMUG would change the existing management area of MA 6B-Livestock Grazing, MA 7A-Timber Management on Slopes <40% and MA 9A-Riparian Area Management to MA 1D-Utility Corridors within the 8.4 miles on the GMUG at a width of 100 feet.” DEIS at 6.</p> <p>In fact, Charlie Richmond, Forest Supervisor for the GMUG National Forest has publicly admitted that it is an open question as to whether the TUA in the DEIS “constitute a road or not.” (See Attachment 2). If it is a question whether the TUA is a road, then the agency must err on the side of the law and cannot implement the project.</p>	<p>activities during site-specific analysis.</p>
Transportation	26	06	<p>Corridors and road crossings are also and issue. Drawing lines on a map is easy and is based upon assumptions that man knows what the animals like and will use. Nothing could be farther from the truth. Like all animals they will cross a road at whatever point it is encountered.</p> <p>Having been involved in caribou studies on the north slope of Alaska, I know the crossing structures do not provide the expected benefit.</p> <p>Caribou will go under pipelines or over pipelines at any convenient spot. Knowing this, I have a problem with the idea that crossings (either overhead or beneath roads) can be constructed and animals will use them. The potential benefits to wildlife just are not there. Millions of dollars will be spent to get a few animals across the highways and the benefit to animals at the population level will not be detectable. The cost benefit ratio to this thinking just is not there.</p>	<p>Comment noted. Management direction is included to provide for habitat connectivity.</p>
Transportation	30	05	The SEIS fails to Acknowledge Road Building Related to	Comment noted. Management direction is

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			<p>Oil and Gas Development. The SEIS identifies Forest backcountry roads and trails as one of the “Risk Factors,” FEIS at 5, but completely fails to identify oil and gas development as one of the major factors in road development in the planning area.</p>	<p>included to provide for habitat connectivity. Effects to lynx from oil and gas development were considered and disclosed in the analysis in Chapter 3.</p>
Wildlife	01b	01	<p>Lynx Denning Habitat: The Colorado Division of Wildlife has provided the following information specific to lynx denning habitat: a combination of higher elevation (generally 10,200 – 11,800 ft.), 15-40 degree slope, generally north-facing aspect of the dens, Engelmann spruce and subalpine fir stands with high fuel loading of course woody debris. (See attachment: “Colorado Lynx Den Habitat”) This information should be instructive in the decision process by the U.S. Forest Service to help refine applicable vegetative standards and guidelines. This is particularly helpful information as the Forest Service attempts to sort through competing issues with preservation of lynx habitat, including fuels treatment, precommercial thinning, and recreational uses.</p> <p>The baseline for any determination on standards and guidelines for denning habitat is the Biological Opinion issued by the U.S. Fish and Wildlife Service in 2000 for all current Forest Plans, without having yet adopted lynx amendments. The Opinion stated that within non-developmental allocations, denning habitat would likely be maintained at or above historic levels.</p> <p>Within developmental allocations, currently applicable old growth standards have been deemed to be adequate to maintain lynx denning habitat in the Southern Rockies.</p>	<p>The LCAS recommended retaining 10 percent denning habitat based on a publication that discussed maintaining lynx habitat over time (Brittel et al. 1989). Brittel recommended a balance of conditions – 30 percent forage, 30 percent unsuitable habitat that would grow into forage habitat, 30 percent travel, and ten percent denning. The ten percent denning habitat was generally based on providing 10 percent old growth habitat. Ongoing research since 1989 has shown that lynx dens are often found under large logs in mature forest stands, but dens have been located in smaller diameter “jack-strawed” piles as well as in rock piles in a variety of structural stages from young regenerating forests to old forests. The integral component of lynx den sites appears to be the amount of downed, woody debris, not the age of the forest stand (Mowat, et al. 2000).</p> <p>Lynx den sites are found in both mature and younger forests that have a large amount of cover and downed, large woody debris. The structural component of lynx den sites are common features in managed (logged) and unmanaged (e.g. insect damaged, windthrow) stands. Based on 40 den sites studied by Squires et al. (in prep) denning habitat is found in a variety of forest conditions and is not a limiting factor for lynx. Indeed, lynx have</p>

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				<p>used all kinds of deadfall for den sites, so it is likely almost any forest does supply denning habitat.</p> <p>Based on this information, the FS consulted with the FWS in the development of Alternative F. Denning habitat direction was consolidated into guideline VEG G11.</p> <p>The research does not indicate a certain minimum amount of denning habitat is required for lynx. The research does indicate that pockets of large amounts of down wood, root wads, or large piles of small wind thrown trees provide denning habitat; and that these pockets should be distributed across an LAU. In general, most forests have some pockets of down trees that would be adequate denning habitat.</p> <p>However, under Guideline VEG G11 if denning habitat appears to be lacking in an LAU, then projects should be designed to retain coarse woody debris, piles, or residual trees to provide future denning habitat.</p>

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Wildlife	01b	02	<p>Lynx Foraging Habitat: Colorado DNR encourages the Forest Service to review that attached scientific studies which focus of availability and density of snowshoe hare habitat as a primary food source for Canada lynx.</p> <p>The Zahratka study: "The Population and Habitat Ecology of Snowshoe Hares (LEPUS AMERICANUS) in the Southern Rocky Mountains" (Appendix B) sheds some light on various hypotheses about snowshoe hare and their habitat selection. Zahratka reemphasizes the need for dense understory by snowshoe hares for predator protection, the need for small-diameter woody stems as a food source for snowshoe hares, and a preference demonstrated by snowshoe hares for spruce fir stands over mature stage lodgepole pine. Another study has found snowshoe hares will show a preference to lodgepole pines under 20 years old to mature lodgepoles or mature spruce fir (Koehler, 1990).</p> <p>Ivan, Shenk and White have undertaken ongoing research in "Density, Demography and Seasonal Movement of Snowshoe Hares in Colorado" (Appendix C) is a three-year ongoing study which will determine if "[t]he current, conservative approach to lynx/hare conservation" is "substantiated scientifically". These authors hope to settle "if the current [conservative] approach is justified or if there is a disparity in the values of different habitat types relative to lynx/hare conservation." Researchers hope to determine that if there is some disparity, whether that justifies forest managers more flexibility "to accommodate competing resource uses while maintaining lynx/hare habitat." (p. 15 –16, Ivan, et al. Program Narrative Study Plan, "Density, Demography, and Seasonal Movement of Snowshoe Hares in Colorado").</p>	<p>Comment noted. The FEIS discusses lynx foraging habitat in the Wildlife section of Chapter 3.. The best available information was considered for this analysis.</p>

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Wildlife	01b	03	VEG Standard 5: The Colorado State Forest Service has raised concerns regarding VEG Standard 5 and the limitations it places on pre-commercial thinning and, ultimately, on long-term forest productivity (See attached letter from State Forest Service). According to the State Forest Service, this limitation on pre-commercial thinning carries beyond the time when regenerated stands could even provide snowshoe hare habitat. Heightened awareness of this issue has occurred in northern Colorado because of the pine beetle epidemic in primarily lodgepole pine trees.	Comment noted. VEG S5 would reduce precommercial thinning. This standard does not apply to non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned.
Wildlife	01b	04	Lynx Mortality on Highways: The Plan advocates amendments ALL G1, HU 06, and Standard Link S1 in order to improve lynx crossings and reduce highway mortalities. Even before Colorado had the data regarding the significant number of lynx mortalities on state highways, Colorado had undertaken mitigating this issue, in collaboration with the Colorado Department of Transportation.	Comment noted.
Wildlife	01b	05	Because many of these issues are developing, Colorado requests that the U.S. Forest Service allow the Colorado Department of Natural Resources, in its capacity as a cooperating agency, to continue providing information as it becomes available in the way of research, studies and reports.	Comment noted. Updated information was considered for the FEIS.
Wildlife	03	01	Alternative D is the preferred alternative, yet the Forest Service's own DEIS shows that Alternative D will	Comment noted. Alternative F was developed in response to comments and

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			"decrease the probability of lynx persistence". Why would the USFS choose an alternative that its own science shows will decrease the chance of lynx survival as compared to other alternatives? It can be deduced from the DEIS that Alternative D would undermine the entire effort and cost of reintroducing lynx in the first place! Only Alternative B increases the chance of lynx persistence, and therefore Alternative B should be the alternative that is implemented.	concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
Wildlife	07	01	I find the analysis biased in favor of Alternative D. The management activities intended in alternative D will have far greater negative impacts on lynx denning, foraging and security habitat, habitat connectivity and the long-term survival of the lynx than are admitted. The agency preferred alternative D is nothing more than pretending to consider survival of the lynx as long as it does not impact business as usual.	Comment noted. The FS consulted with the FWS along with considering comments on the draft EIS and developed Alternative F, the preferred alternative in the FEIS.
Wildlife	08	01	You are making too much of the lynx habitat. I lived "with" one for two winters (until I sold my house last April). From the very first it was not afraid of me even though I was afraid of it. It would look at me and continue walking or trying to catch moles or whatever. There was the busy Hwy 160 very near as well as neighbors dogs. It did not feel threatened or in danger.	Comment noted.
Wildlife	09	02	As with any wildlife species, the Lynx will follow their food and their life cycle will cycle with their food source. The continued growth of the current Lynx population leads us to believe that if left alone the Lynx will thrive on their own. Micromanaging their habitat, denning, travel and even food source can only disrupt their natural instincts for survival. Since, in fact, the Canada Lynx is not an Endangered Species in the world; it makes no sense to us to completely alter the management of the forest to protect an animal that is quite happy to live where he wants to.	Comment noted. The FS recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	16	01	Lynx analysis units are very arbitrarily drawn to include all possible habitat rather than required habitat. The people who drew the lines did not field-check the locations.	Comment noted. The mapping process used was included in Appendix F and completed by unit biologists following the

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				mapping process.
Wildlife	16	02	USFW not only did not designate any critical habitat for the lynx, but stated that Colorado does not have the features essential for lynx.	Comment noted. Although the FWS did not identify critical habitat in the Southern Rockies Geographic area, the FS recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	16	03	Given the current epidemic of mountain pine beetle in Colorado, and thus the conversion of mature forests to seedling stands, it is extremely presumptuous of the USFS to preempt thinning of these new stands for "possible" lynx habitat.	Comment noted.
Wildlife	18	02	We specifically request that Lynx Analysis Units (LAUs) be defined only in areas of critical lynx habitat. Currently LAUs are defined in our area without consideration for whether the areas contain critical lynx habitat or not. This approach unnecessarily constrains forest management activities.	Comment noted. Although the FWS did not identify critical habitat in the Southern Rockies Geographic area, the FS recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	18	03	We just received in the mail a copy of the Environmental Assessment for Management Indicator Species (MIS), a recent amendment to the Routt National Forest Management Plan. Given the pervasive effects of the Lynx Amendment, we found it ironic that neither the lynx nor the snowshoe hare showed up on the MIS list.	Comment noted.
Wildlife	18	04	In closing, we request that the Preferred Alternative give discretion to local US Forest Service personnel to balance the needs of the lynx and its prey species with all other forest management objectives on a local level.	Comment noted.
Wildlife	19	01	G1- Agree with H/W avoidance techniques and habitat connectivity- corridors. V04- also habitat and hare protection- also see GRAZ01.SL4 especially SHEEP GRAZING.	Comment noted.
Wildlife	19	04	Habitat and migration corridors seem to be the most critical factors in conserving and preserving the lynx. The plan should be flexible enough that if monitoring shows population decline that more restrictions be imposed soon and rapidly enough to respond to the loss immediately.	Comment noted. Management direction for providing for linkage areas is incorporated in the amendment (see LINK LINK O1, LINK S1, LINK G1, LINK G2)

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Wildlife	21	03	The US FWS did not designate any critical habitat in Colorado. In fact, the US FWS stated "In the Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population." We cannot reconcile that statement with your proposal, which would manage 50% of all the national forest acreage in Colorado as lynx habitat. We urge you to go back to the drawing board and propose a new, more balanced approach.	Comment noted. Although the FWS did not identify critical habitat in the Southern Rockies Geographic area, the FS recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	22	03	We believe the concept behind the proposed forest plan amendments is fundamentally flawed, as discussed below: a) The SDEIS does not analyze or disclose whether or how the proposed forest plan amendments will actually benefit lynx or their habitat in the Southern Rockies. In his Discretionary Review Decision for the White River NF forest plan revision, Deputy Under Secretary Tenny stated "I find that the lynx standards and guidelines in the White River NF LRMP may unnecessarily constrain legitimate activities without a rational basis upon which to conclude that either the lynx or its critical habitat is even present to benefit from such constraints". In light of Mr. Tenny's decision and the subsequent designation of critical habitat by the US FWS, the Forest Service should disclose the presence and distribution of lynx presently within the Southern Rockies, and provide analysis regarding 1) the likelihood that previously occurring management activities would adversely affect lynx and 2) the degree to which lynx or lynx habitat will benefit from the proposed forest plan amendments.	Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.
Wildlife	22	05	According to Appendix F, lynx habitat was determined to be "vegetation that could contribute to lynx habitat", as mapped by lynx biologists, despite acknowledgement by the US Fish & Wildlife Service that "In the Southern Rockies regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population" (Federal Register, March 24, 2000). The US FWS recently	Lynx habitat mapping was a biological inventory, which was done in an interagency process, as documented in Appendix F of the DEIS, SDEIS and FEIS. Adjustments to the habitat mapping may occur based on site-specific analyses. Although the FWS did not identify critical habitat in the Southern Rockies

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			completed designation of critical habitat, but did not designate any critical habitat in the states of Colorado or Wyoming, stating, "In the southern Rockies, it is still uncertain whether a self-sustaining lynx population will become established. . ." and "Although Colorado's reintroduction effort is an important step toward recovery of lynx, we determined that the Southern Rockies does not have features that are essential to the conservation of lynx and require special management" (Federal Register November 9,2006). "The final rule (USDI 2000) and remanded final rule (USDI 2003) found that low numbers of lynx in the contiguous United States compared to northern Canada occur . . .because lynx and their prey are naturally limited by the amount of habitat, topography, and climate" (Recovery Outline). We are puzzled that the Forest Service continues to propose to implement virtually identical management direction for lynx in the Southern Rockies, where 1) naturally occurring lynx may not even exist, 2) there is no critical habitat, and 3) lynx populations are naturally limited by natural factors beyond the Forest Service's control, as for other areas of the contiguous United States where there are naturally occurring lynx and the US FWS has identified critical habitat.	Geographic area, the FS recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	22	06	The US FWS has not yet finalized a Recovery Plan, without which we believe the proposed amendments to the forest plans in the Southern Rockies are premature. We believe a better approach would be to build on population strongholds and the reasons for such strongholds, as was done with the Grizzly Bear Recovery Plan, instead of proposing a generic set of unfocused, broad-scale recommendations.	Comment noted. Although the FWS did not finalize a Recovery Plan, the FS reviewed the Recovery Outline and recognizes the need to provide habitat for this Federally listed species that occurs on NFS lands.
Wildlife	22	08	Concerns regarding the locations to which the prohibition on precommercial thinning applies: Despite the discussion in Appendix F that lynx are not identified with "dry or climax lodgepole pine", there are no details regarding how "dry or climax lodgepole pine" was identified or subsequently excluded from the lynx habitat map. Based on our	Comment noted. The Forest Resources - Timber Management analysis was updated for the FEIS based on updated information from the affected Forests. VEG S5 would reduce precommercial thinning. This standard does not apply to

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			knowledge of national forests in northern Colorado, it does not appear that any of the lodgepole pine landscapes on the Routt or Arapaho Roosevelt NFs have been excluded from the lynx habitat map	non-lynx habitat such as xeric forests, typified where ponderosa pine, lodgepole pine, or Douglas-fir are the climax species. The restrictions associated with this standard vary between alternatives. This standard would reduce ability to achieve some objectives including vegetation diversity, forest health, and timber production. The FEIS displays the likely annual acres of precommercial thinning under each alternative in Table 3-13. The FEIS compares alternatives in their flexibility to achieve timber management objectives on suitable timber lands; flexibility to respond to insect and/or disease concerns; and the acres precommercially thinned and the percent of the baseline acres that would be thinned. Adjustments to the habitat mapping may occur based on site-specific analyses.
Wildlife	26	01	One of my primary concerns is use of the LCAS. First, that document was written before the Ecology and Conservation of Lynx in the United States (Ruggiero, et.al, 2000) was finalized. It was well intended, but now there needs to be some changes made based upon new information. The same holds true for the BO prepared by the FWS. Both of these should have been written with the idea in mind that new data would necessitate changes in the way situations are evaluated and decisions made. In other words there should be a dynamic approach to the use of the plan. As more information is compiled adjustments should be made. All too often a document is prepared and the guidelines presented in that document are implemented. However, over time as more data comes in there is a need to make adjustments.	Comment noted. The LCAS considered all of the information in Ruggiero et al., even though the book was printed later. We agree with the need to consider new information as it becomes available. The best available information was considered for this analysis. Site-specific analyses will continue to incorporate new information as it becomes available.
Wildlife	26	03	There is considerable emphasis placed on snow compaction and how it takes away the advantage lynx	The LCAS (p. 2-6) indicates "very few studies have investigated the complex

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			<p>have over other predators to access areas. My surveys have shown this to just not be the case. In the Grand Mesa and Gunnison forests where I have been doing my work high numbers of coyote tracks are commonly observed. Within 1 to 2 days following a large snowstorm there are coyote tracks throughout the area. I have found that more than 80% of the tracks do not follow packed trails and most of these are found to be crossing the packed trails. Even if they do follow packed trails, or maybe not, I have found no evidence where they are preying on hares. Squires found that in the winter coyotes are scavengers and do not waste energy in trying to capture hares in deep snow. In the areas where I have been working it does not appear they are trying to capture hares, even when the snow is set up.</p>	<p>interactions between humans and wildlife.” The FWS stated in the Remand Notice, “Because no evidence has been provided that packed snowtrails facilitate competition to a level that negatively affects lynx, we do not consider packed snowtrails to be a threat to lynx at this time” (Federal Register Vol. 68, No. 128, p. 40098) (USDI FWS 2003). The DEIS Chapter 3, page 18 stated “Even though there is no hard scientific evidence that snow compaction can lead to increased competition from other predators as yet, the LCAS recommends that “Until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey.” (Ruediger et al. 2000). Snow compaction leading to increased competition is one of the potential threats to lynx. No research has been conducted in the SRMGA to determine how large an opening lynx will regularly cross during home range foraging.</p>
Wildlife	26	05	<p>Controlling snow compaction by snowmobiles, cross-county skiers and snow shoers, especially snowmobilers is not being properly used. In many areas that are being closed to snowmobilers the suitable hare habitat is not accessible to snowmobilers and others. Yet the USFS closes down large areas or access into areas because they feel it is opening up the area to other predators that will compete with or kill lynx. They need to spend time in the field assessing habitat and prey base conditions before making these decisions.</p>	<p>Additional research has occurred in northwest Montana and in Utah since the Remand Notice was published. In northwestern Montana, radio-collared coyotes were monitored over three winter seasons. The coyotes remained in lynx habitat having deep snow conditions and traveled on compacted snowmobile trails more than expected by random chance. However, coyotes used compacted snowmobile trails for less than 8 percent</p>

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				<p>or their travel and used compacted and uncompacted roads similarly (Kolbe 2005). Coyotes did strongly select for shallower and more supportive snow surfaces when traveling off of compacted trails. In this same study coyotes primarily scavenged ungulate carrion that was readily available while snowshoe hare kills comprised only 3 percent of coyote feeding sites (Kolbe 2005).</p> <p>In northern Utah coyotes accessed deep snow in mapped lynx habitats that would otherwise be unavailable to them (K. Bunnell, 2006). In the Uinta Mountains of NE Utah and three comparative study areas (Bear River range in Utah and Idaho, Targhee NF in Idaho, and Bighorn NF in Wyoming) Bunnell (2006) found that the presence of snowmobile trails was a highly significant predictor of coyote activity in deep snow areas. From track surveys it was determined that the vast majority of coyotes (90 percent) stayed within 350 meters of a compacted trail and that snow depth and prey density estimates (snowshoe hares and red squirrels) were the most significant variable in determining whether a coyote returned to a snowmobile trail (Bunnell, 2006). Based on these studies there is no conclusive evidence regarding the effects of winter over-the-snow use on snowshoe hare or lynx.</p> <p>The standards developed in Alternatives B, C, and D for human uses (the HU standards) do not preclude winter recreation, but rather maintain the status quo. Alternative F changes the standards</p>

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				to guidelines to allow for more consideration based on site specific situations. In addition, including the direction as a guideline still provides the option for any more definitive site specific management direction at the project level. If it is found that lynx and coyotes are competing in a particular area due to snow compacting activities then the guideline would be followed; and if not then the guideline need not be followed.
Wildlife	26	04	There are those who feel that lacking snowshoe hares the lynx can prey upon species such as red squirrels. This might be true in some areas, but in the area I am working there are large populations on American marten. Obviously, they are more adept at taking red squirrels in the winter which reduces the prey base available to lynx.	Comment noted. Although lynx prey on other animals, the main prey species associated with lynx is snowshoe hare.
Wildlife	27	01	On April 24, 2006, the Interagency Lynx Biology Team (Team), working under the guidance of the Interagency Lynx and Wolverine Steering Committee (both of which include members from the U.S. Fish and Wildlife Service (USFWS) and Forest Service), provided its final report of the Team's visit to the White River National Forest. One discussion point in the report included lynx movement and connectivity. As stated in the report, "Maintaining long term connectivity is an essential element of lynx management." The Team recommended that the Forest Service conduct a multiple scale analysis of lynx habitat and connectivity and stated that this type of analysis could be useful for the Southern Rocky Mountains Lynx Amendment. We fully support this recommendation and suggest that this analysis occur before the Forest Service completes the amendment process. The analysis discussed in the final report would aid the Forest Service in evaluating the cumulative effects of all activities on lynx and provide a baseline for analysis that currently does not exist in one location.	Comment noted. Connectivity direction is provided in the Linkage standards and guidelines. Site-specific analyses will continue to incorporate new information as it becomes available.
Wildlife	27	02	We are concerned about language in the SDEIS regarding	Comment noted. Site specific project

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			<p>the exemption of identified activities from Standards. For example, on page S-18 under Alternative B, HU S1, the Standard does not apply “within permitted ski area boundaries, to winter logging, reroutes that reduce public risks from avalanches, access to private in-holdings, roads and trails designed and managed for non-winter use, and to other access regulated by HU S3.” We recommend that exemption language be clarified that it addresses only exemption of activities from a plan amendment but not exemption from an effects analysis pursuant to section 7 of the Endangered Species Act (ESA). The final Standard language needs to stress that the exemption of activities under the plan merely allows an activity to occur in light of a standard (i.e. will not require a site specific plan amendment), but does not translate to a “no effect” conclusion in terms of the effect the activity will have on lynx. We bring this to your attention, because we have received assessments of projects that made this conclusion at the project level of analysis where an activity received an exemption from a forest plan standard.</p>	<p>would be required for new proposals not previously addressed in an analysis effort. This amendment process does not change the need for site specific projects to meet law, regulation and policy.</p>
Wildlife	27	03	<p>We also request that the Forest Service clarify the relationship between the currently proposed Southern Rockies Canada Lynx Amendment to provide conservation measures for lynx, and the proposed revision of forest plans using the 2005 planning rule. Several forests within the Region 2 of the Forest Service have initiated the revision process for their forest plans. The revised planning rule categorically excludes forest plan revisions from further environmental analysis, perhaps curtailing the extent of public disclosure during the revision process itself. The Department understands that the USFS regards guidelines under the new planning rule as ‘expected behavior’ but requests clarification as to how the Forest Service intends to implement these conservation measures under the new planning rule and whether the Forest Service will be able to provide adequate regulatory mechanisms to conserve the Canada lynx under the new rule.</p>	<p>This amendment will amend the Forest Plans in the Southern Rockies amendment area. Future forest plan revision efforts will incorporate appropriate direction as it exists at the time of decision.</p>

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Wildlife	27	05	<p>The report mentions “noise” as a factor which might affect dispersal movements of lynx within and between habitats (Page 87, Chapter 3 Affected Environment and Environmental Consequences, Factors Potentially Affecting Lynx Movements). Noise, however, might also affect physiological stress levels in lynx. Because numerous potentially noise-producing activities (e.g., mining, snowmobiling) could occur adjacent to designated lynx habitat, the USGS suggests, for consideration, some research results pertaining to endocrine disrupting stress response to noise in large mammals.</p> <p>Creel et al. (2002) address potential stress caused by snowmobile noise by monitoring fecal glucocorticoid (GC) levels in both elk and wolves. These data found rises in GC concentrations correlated with snowmobile usage. The potential significance of this finding is that elevated GC levels are associated with physiologic suppression of mammalian immune systems and reproductive hormones. These results might provide insight into the potential welfare of mammals, for example, lynx, in areas adjacent to noisy activities.</p>	Comment noted. Effects to lynx from management activities are discussed in the Wildlife section in Chapter 3, FEIS.
Wildlife	28	01	<p>We remain concerned by how little the preferred alternative would actually protect lynx and lynx habitat. The now-included White River National Forest will suffer the same deficiencies. The preferred alternative represents a remarkable departure from the best available science on lynx conservation and the recommendations of the Forest Service’s own biologists (and those of the other federal agencies involved in the development of the Lynx Conservation Assessment and Strategy). In order to comply with the Endangered Species Act, the National Forest Management Act, and other relevant legal and regulatory duties, the Forest Service’s final lynx amendment must comport with the best available science on lynx conservation and the recommendations made by top lynx biologists in the Lynx Conservation Assessment and Strategy (“LCAS”).</p>	Comment noted. The best available information was considered during analysis. Alternatives were developed in response to issues raised that responded to the purpose and need. Alternative F was developed in response to comments and concerns expressed on the DEIS and SDEIS. The Forest Service consulted with the FWS and considered comments received and developed Alternative F, the preferred alternative in the FEIS that would meet the purpose and need.

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			The Forest Services' duty to comply with these environmental laws and to protect the Canada lynx have become more challenging with the failure of the U.S. Fish and Wildlife Service ("FWS") to designate critical habitat in the Southern Rockies and its failure to develop and implement a recovery plan, as well as with the proposed developments at Wolf Creek Pass and Minturn.	
Wildlife	28	02	The Forest Service has an increased burden to manage National Forests for lynx management and carefully evaluate proposed projects for their impacts on lynx and lynx habitat.	Comment noted.
Wildlife	28	03	The proposed Ginn development at Minturn threatens to develop approximately 5,300 acres of a potentially key lynx corridor. The development calls for 1,700 homes, 1,100 acres of skiing, commercial development on part or most of 4800 acres, and a golf course – all through an area where the Colorado Division of Wildlife has tracked lynx movement, and that FWS has previously identified as being important for landscape-level connectivity for lynx.[2] Ginn admits that the development would result in lynx habitat loss and endanger the lynx due to increased traffic on U.S. 24.	Comment noted.
Wildlife	28	04	One reason offered by FWS for not designating critical habitat in the Southern Rockies was because it claimed that lynx already receive "considerable management attention" from the Forest Service, and therefore such designation is not necessary. 71 Fed. Reg. 66008, 66010 (Nov. 9, 2006). FWS's logic was erroneous in part because the lynx is not getting the management protection it needs, and failure of the Forest Service to specifically and completely manage for the recovery of the lynx will result in a failure to meet FWS's expectations. The preferred alternative in the SDEIS does not provide for the best management of the lynx. The guiding principles of Forest Service management compel it to use the best scientific knowledge in making decisions in furthering its mission to sustain the health and diversity of the Nation's	Alternative F was developed in consultation with the FWS to ensure adequate management direction would be provided with the amendment.

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			forests.[3] Sustaining the health of the forests includes, first and foremost, protecting its most imperiled species from extinction. The Forest Service should adopt an Amendment designed to ensure the highest level of protection for the lynx.	
Wildlife	28	06	Adopt Alternative B with the following modification: The lynx amendment must specifically incorporate the 38 critical linkages as designated by the Forest Service and fully incorporate the linkage management recommendations of the LCAS. It must also require appropriate highway mitigation (including underpasses and overpasses) for lynx within these linkages.	Comment noted.
Wildlife	28	07	Adopt Alternative B with the following modification: The lynx amendment must include strengthened monitoring requirements.	Comment noted.
Wildlife	30	04	The Impacts on Canada Lynx under the Preferred Alternative in the SEIS violates the ESA. Finally, even though it is clear that the Forest Service is authorizing an action that will result in "take" of Lynx, it has further violated the ESA by not producing a Biological Assessment addressing such take. To fulfill its Section 7(a)(2) mandate, if a species may be present, an action agency must prepare a biological assessment ("BA") for the purpose of identifying endangered or threatened species which are likely to be affected by an action. 16 U.S.C. § 1536(c) (1).	The FS has consulted with the FWS and will continue to consult with the FWS to ensure adequate regulatory mechanisms are in place for the Canada lynx, and to comply with the ESA.
Wildlife	31	01	As a veterinarian and a rancher, I have a deep respect for the welfare and humane treatment of all animals. I find it outrageous that the last time the DOW tried to relocate lynx half of them starved to death. If anyone else would let even a portion of their animals or livestock starve to death they would be in prison and crucified. The DOW has repeatedly done just that and said the "experiment" was a success and we let them continue. It is time we put a stop this and held those responsible for these starvations accountable. I find it appalling that you would even consider letting them continue such blatant disregard for	Comment noted. The amendment is to provide management direction for lynx. The lynx reintroduction program is outside the scope of this analysis.

Resource	Letter Number	Comment Number	Comment	Response
			animal life.	
Wildlife/GIS	26	02	<p>Lynx habitat mapping is being done by the forests based upon GIS data. However, there is little or no follow-up ground truthing in most of the forests. The false assumption is being made that if GIS shows the vegetation type as being lynx habitat, then it is lynx habitat. These areas need to be ground truthed for prey base and actual habitat condition. If vegetation structure necessary to support snowshoe hares is lacking and there are few or no snowshoe hares, then it is hard to accept it being considered lynx habitat. A lynx may move through the area, or even spend some time, but conditions are lacking to support a viable population. I find it hard to accept some of the mapping based upon hare and habitat surveys I have conducted over the last three winters. I have been conducting winter surveys twice a month in portions of the Grand Mesa and Gunnison forests and have run over 1500 miles of transects. During that time, I have found that many areas of spruce-fir are in a mature to overmature condition and suitable habitat is lacking for snowshoe hares. Numbers are very low in the over mature stands where the hares cannot take advantage of the trees for forage and cover. Probably below what would be considered necessary to support lynx. John Squires (USFS) and others have found that most lynx mortality occurs in the winter when there is lack of snowshoe hares which comprise 95%+ of their diet during that period.</p> <p>I have found during my work that snowshoe hare numbers are highest in areas that were logged 30 to 40 years ago. Thus, it is obvious there needs to be more management of the forests, either through thinning operations or fire, to create more habitat over time.</p>	<p>Detailed maps of lynx analysis units at the National Forest scale are available from each National Forest. Those maps are updated as new information becomes available. Identifying and mapping lynx habitat and linkage areas is a scientific process using the best available information. The process used is identified in Appendix D for linkage areas and Appendix F for lynx habitat. Public review and comment is not a part of the identification of lynx habitat. Public comments are appropriate on the management of the identified lynx habitat and linkage areas during site specific project planning</p>