Intermountain Forest Association

2218 Jackson Blvd. Suite 10 Rapid City, SD 57702

605•341•0875 Fax 605•341•8651

Grand Mesa, Uncompahgre, & Gunnison NFs
DEC 18 2017

December 8, 2017

Mr. Scott Armentrout
GMUG NFs
2250 Highway 50
Delta, CO 81416

Dear Mr. Armentrout:

On behalf of the members of the Intermountain Forest Association, following are several comments regarding the Southern Rockies Lynx Amendment (SRLA) direction for your consideration as you finalize the Need to Change for the GMUG NFs forest plan revision.

IFA has carefully followed the listing of Canada lynx and the Forest Service's response to that listing. IFA has commented repeatedly on the development and implementation of the SRLA, especially regarding the adverse effects of the SRLA direction on forest management, timber outputs, and forest health in the national forests in Colorado and southern Wyoming.

Among other things, the U.S. Fish and Wildlife Service's Final Rule listing the Canada lynx as Threatened stated, in reference to the Northern Rockies/ Cascades and Southern Rockies:

> "However, considering the overall proportions of lynx forest types affected, timber harvest and precommercial thinning on Federal lands are not currently conducted, nor are they likely in the projected future to be conducted, at levels likely to impact lynx at the population level" (March 24, 2000 Federal Register, p 16072).

The 2008 SRLA amended the GMUG NFs forest plan to "add consistent management direction that will conserve the Canada lynx." The SRLA was intended to be short-term direction until the affected forest plans were revised; at the time, plan revisions were anticipated to be completed shortly. In our view, the SRLA was overly restrictive with regard to forest management, especially considering the relatively low-quality lynx habitat in Colorado national forests. The USFWS has repeatedly discussed the low quality of habitat in the Southern Rockies Geographic Area for lynx, including the following three quotes from the September 12, 2014 Federal Register:

"... we conclude that habitat in Colorado and other parts of the Southern Rockies is marginal, naturally fragmented, and disjunct; that it has not been historically capable of supporting natural resident lynx populations; that it has not been demonstrated to contain all of the physical and biological features essential to lynx in adequate quantity and spatial arrangement to support lynx populations over the long term (i.e., it does not contain the [Primary Constituent Element]); and that it is not essential to the conservation of the [Distinct Population Segment]" (p 54795).

-"The generally low hare densities ... in western Colorado ... suggest that even the best potential lynx habitat in the Southern Rocky Mountains is marginal and unlikely to support lynx populations over time" (p 59817).

-"the contribution of the Southern Rockies to the persistence of lynx in the contiguous United States is presumably minimal" (p 59817).

The SRLA Record of Decision requires the Forest Service to review and reconsider the direction in the SRLA when the forest plans for each of the affected national forests is revised. We view the revision of the GMUG NFS forest plan as an opportunity to consider what has been learned since the SRLA was approved, and, using that information, to update the lynx direction in the revised forest plan.

Best Available Scientific Information

Dr. John Squires' research into lynx populations and habitat on the Rio Grande NF offers an excellent opportunity to consider current research as part of the GMUG NFs plan revision. We look forward to working with you to reviewing his research findings, as well as other applicable science, in development of the revised forest plan.

Desired Conditions and Objectives

Implementation of the SRLA has been disproportionately focused on the Standards with virtually no attention paid to Objectives VEG O1 and VEG 02, which state:

-VEG 01 - Manage vegetation to mimic or approximate natural succession and disturbance processes while maintaining habitat components necessary for the conservation of lynx.

-VEG O2 - Provide a mosaic of habitat conditions through time that support dense horizontal cover, and high densities of snowshoe hare. Provide winter snowshoe hare habitat in both the stand initiation structural stage and in mature, multi-story conifer vegetation.

We recommend increasing the emphasis on Objectives and Desired Conditions relative to Standards in the revised forest plan, and recommend that the GMUG NFS take a hard look at long-term desired conditions and objectives.

Precommercial Thinning I

One result of the beetle epidemics and large fires is hundreds of thousands of acres of young, high-density stands in the Southern Rockies Geographic Area. We urge you to consider the following questions:

-What are the long-term implications of managing versus not managing those stands for lynx habitat as well as habitat for other wildlife species? We recommend using some of the modeling tools already being used elsewhere by the Forest Service to predict, for example, density, various wildlife habitat values, potential for forest fires, and potential for insect epidemics in 80 year old thinned and unthinned lodgepole pine stands, as well as the habitat diversity and values, fire potential, and insect risk across the broader landscape.

-How can the Forest Service retain hare habitat in the short-term, but promote long-term diversity, a mosaic of wildlife habitat, and forest health in post-harvest, post-burn, and post-beetle epidemic areas?

Precommercial Thinning II

According to the SRLA FEIS (pages 59-60, and 135), "For non-thinned lodgepole pine stands in management areas where commercial timber production is a goal, an 89% reduction of production of sawlog-sized material would be anticipated over the next 60 years."

However, instead of a detailed analysis and disclosure of effects, the Forest Service misrepresented the effects of essentially prohibiting all precommercial thinning in lynx habitat; following are several examples:

-"The new direction will also not substantially alter timber outputs, even though it may affect the mix of products as well as growth and yield" (SRLA ROD, p 25).

-"Limiting precommercial thinning may reduce growth and yield of some lodgepole stands, and the potential to produce some products [i.e., sawtimber] in the future, overall cubic foot volume would not be affected" (SRLA ROD, p 25-26).

-"In addition, the ASQ would not be affected on any units because the management direction does not preclude timber harvest" (SRLA ROD, p 26).

-"Therefore, changes in LTSY are unlikely to lead to changes in outputs, especially as measured in cubic feet" (SRLA ROD, p 26).

-"These potential reductions would occur in future decades and not the current planning period" (SRLA FEIS, p 136).

-"Limiting precommercial thinning in lodgepole pine forests could affect growth and yield, and the potential to produce some products in the future, because these forests tend to stop growing if not thinned; however, overall cubic foot volume would not be affected" (SRLA FEIS, p 231).
-"Limiting precommercial thinning may reduce tree growth and long-term sustained yield (LTSY) in these stands. ... It is likely there would be no change in overall timber outputs, but there may be changes in what material is harvested and where." (October 10, 2008 Rocky Mountain Region SRLA Communications Plan).

Further, a June 22, 2012 letter from Regional Forester Dan Jiron stated "[The SRLA and NRLMD] acknowledged that limitations on precommercial thinning could affect forest growth and yield, but would not reduce overall cubic foot volume production [emphasis added]." The misplaced belief, which continues to be pervasive in the Forest Service, that there will be no ill effects from not precommercial thinning as long as cubic foot volume production is maintained, is simply not true. Consider for a minute the problems the Rocky Mountain Region is currently having selling large volumes of POL, and imagine the Forest Service's management program if all future timber from young regenerated stands is POL.

We recommend that you thoroughly analyze, and disclose, the effects of restrictions on precommercial thinning on forest growth and yield, the forest products industry, and social and economic sustainability.

We also recommend exploring precommercial thinning prescriptions that could increase hare habitat over "typical" precommercial thinning prescriptions, for instance, by emphasizing more diversity of leave tree species or by leaving portions of the stand unthinned as described in Griffin and Mills, 2007.

Risk Factors

According to the Draft Assessment Discussion of Canada lynx (Lynx Assessment), "The LCAS identified several ... "risk factors" for the Southern Rockies Geographic Area. Risk factors affecting lynx productivity included fire exclusion, grazing, and winter recreational uses that create compacted snow conditions." We would point out that forest management and timber harvest were not included as a "risk factor." That is consistent with the Canada lynx listing decision (Fed Reg, March 24, 2000, p 16073), in which the USFWS discussed the large proportion of lynx forest types managed in nondevelopmental status and concluded that levels of timber harvest and thinning are not likely threatening the Southern Rockies lynx population. Further, the USFWS noted documented lynx presence and reproduction in a variety of managed landscapes. Similarly, in the 2013 LCAS, the section titled

"Human activities and developments specific to the Southern Rockies" (page 55-56) does not mention timber management activities as a risk factor.

A major reason that forest management and timber harvest were not identified as risk factors is the relatively high proportion of undevelopable acres and the relatively low proportion of timber harvest acres. For example, the GMUG NFS is 2,965,907 total acres, of which 554,580 acres are designated Wilderness (19%), 901,100 acres are Colorado Roadless Areas (30%), and 550,131 acres are suited timberlands (19%). Further, the total FY 15 timber harvest acreage was only 2,350 acres (.08%), which is miniscule compared to the number of acres affected by insect epidemics and fires over the past 20 years.

So, why then, if forest management and timber harvest are not "risk factors," is the direction in the SRLA so heavily biased against timber harvest and forest management? Why are timber harvest and precommercial thinning disproportionately targeted? We urge the GMUG NFS to take a "deep dive" into those questions as part of the forest plan revision.

Linkage/Connectivity

We are concerned that designation and/or management of "connective habitat" would have further adverse effects on forest management. The SRLA direction is very vague; the definition of "Habitat connectivity" is "Cover (vegetation) in sufficient quantity and arrangement to allow for the movement of lynx." Considering a) that the SRLA contains very little specific direction about managing for connectivity, b) that the USFWS's concern about habitat connectivity appears to be primarily "high volume, high speed highways" and suburban developments (see Fed Reg, March 24, 2000, p 16080), c) that the USFWS has "no information demonstrating that forest roads negatively impact resident lynx populations" (see Fed Reg, March 24, 2000, p 16080), and d) the documented travels of 'Colorado' Canada lynx to Alberta, Kansas, Utah, Wyoming, New Mexico, Montana, Idaho, Arizona, Nebraska, and Nevada across many miles of "unsuitable habitats", we recommend that any identification/designation of "connective habitat" as part of the GMUG NFS forest plan revision include a discussion of the need for that designation, the benefits of that designation, how those would be managed, and how those would affect overall management of, and outputs from, the GMUG NFS, with an opportunity for public review and comment.

Mapping

The SRLA did not designate lynx habitat. Instead, the SRLA established the direction that would be applied to mapped lynx habitat (ROD, p 6). The criteria used for lynx habitat was "vegetation that **could** [emphasis added] contribute to lynx habitat" (SRLA-FEIS App F), regardless of lynx occupancy, use, or

probability of long-term persistence. The Forest Service's decision that all national forest lands that "could contribute to lynx habitat", as identified by wildlife biologists, would be managed as lynx habitat is, to my knowledge, unprecedented, and certainly a much higher standard than for other T&E species, for example, grizzly bears, black footed ferrets, or spotted owls.

Approximately 1,557,000 acres of the GMUG NFs, about 53%, are mapped as lynx habitat. Unfortunately, the Forest Service has never allowed public review of or comment on lynx habitat mapping or even the protocols for lynx habitat mapping. We view that as a serious shortcoming considering the significant effects of whether a particular acre is mapped, or not mapped, as lynx habitat, and recommend that you allow public review and comment on lynx habitat mapping as part of the forest plan revision.

We also recommend that you analyze the underlying assumption that all lynx habitat is equally important.

Occupied/Non-occupied

A premise of the SRLA was that national forests are either occupied or not occupied in their entirety. We recommend that you review what portions of the GMUG NFs have resident, reproducing lynx populations and consider identifying only those portions of the Forest as occupied.

Bookkeeping

The FS adopted an overly complex, expensive, time-consuming and perhaps not all that meaningful analysis requirements based on LAUs. Similarly, the FS also adopted an overly complex, expensive, time-consuming, and perhaps not very meaningful monitoring process for the SRLA. Both of those are especially true considering the low value of lynx habitat in the SRGA. We recommend that you explore less expensive and time-consuming methods for analysis and monitoring.

Summary/Key Questions

1. The 2013 LCAS revision recommends focusing limited conservation resources on those "... relatively limited areas that support persistent lynx populations and have evidence of recent reproduction, with less stringent protection and greater flexibility given in areas that only support lynx intermittently" (Interagency Lynx Biology Team 2013, p. 2, and Sept 12, 2014 Fed Reg, p 54813). Is the GMUG NFS/SRGA an area where "less stringent protection and greater flexibility" would be appropriate?

2. Why not establish a sliding scale of lynx habitat 'importance', based in part on the presence or absence of lynx, and then develop forest plan

direction for 'low value' lynx habitat that is less restrictive than direction for 'high value' lynx habitat? Could that replace the current time consuming, expensive, and contentious mapping process?

3. Revision of the forest plan, including lynx habitat direction, should consider predicted long-term stand structure development, associated wildlife habitat values, and timber outputs (in cubic feet and board feet) at a landscape scale.

4. To what extent, if any, have completion of the Roadless Area Conservation Rule and Colorado Roadless Rule and the consequential change in the proportion of national forest lands in developmental versus nondevelopmental allocations since the decision to list the Canada lynx in March 2000 changed the USFWS's assessment of the adequacy of existing regulatory mechanisms? See attached February 1, 2015 IFA letter.

5. Given the USFWS's conclusion in March 2000 that timber harvest and precommercial thinning on Federal lands were not currently conducted at levels likely to impact lynx at the population level, why not establish a threshold at those levels, below which there would be only minimal analysis or restrictions?

6. What are current precommercial thinning needs on suited timberlands in the GMUG NFs? We recommend developing a strategy to accomplish that thinning as part of the forest plan revision.

7. How will the effects of updated lynx direction on social and economic sustainability be analyzed and considered?

8. What is the best available scientific information regarding connectivity, linkage corridors, and winter snow compaction, and what direction, if any, to address those issues should be included in the revised forest plan?

9. Why not identify only those portions of the GMUG NFs with resident, reproducing lynx populations as "occupied"?

10. To what extent can lynx habitat needs be satisfied through the "coarse filter"? What is the "right" combination of Objectives, Desired Conditions, and Standards to achieve lynx habitat needs?

11. The Forest Service has been implementing the recommendations in the Lynx Conservation Assessment and Status since 2000 and has been

implementing the SRLA in the SRGA since 2008. What has been learned from effectiveness monitoring and how will those results be considered and incorporated into the revised forest plan?

12. How will lynx direction be integrated into the revised forest plans, instead of being relegated to an appendix?

Thank you for your consideration and I would be happy to discuss this letter with you and your staff at your convenience.

Sincerely,

Thomas A. Troxel
Executive Director

Intermountain Forest Association

2218 Jackson Blvd, Ste 10, Rapid City, SD 57702
605-341-0875 Fax 605-341-8651

February 1, 2015

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
Attn: Jim Zelenak
585 Shepard Way, Suite 1
Helena, MT 59601

Dear Mr. Zelenak:

Following are the Intermountain Forest Association's comments regarding the Canada Lynx Five Year Review:

The March 24, 2000 Final Rule to list the Canada Lynx as Threatened estimated that approximately 75% of the federally managed lynx forest types in the Southern Rockies were in "developmental status" where management for multiple uses may, on local scales, conflict with lynx conservation (Federal Register, page 16073, 3rd paragraph and Table 1). That estimate grossly overestimated the number of acres in the Southern Rockies where development would likely ever occur.

Since then, the Forest Service adopted the Roadless Area Conservation Rule (January 12, 2001) and the Colorado Roadless Rule (July 3, 2012). Those rules significantly reduced the acres in the Southern Rockies Geographic Area in "development status". According to my best information for the national forests in the Southern Rockies Geographic Area (Colorado, plus the Medicine Bow NF in Wyoming), only about 30% of the forested acres are currently in "development status".

Total Forested Acres	11,051,983
Designated Wilderness	3,168,824
Roadless	4,572,600
Total	7,741,424

7,741,424 / 11,051,983 = 70% in non-development status = 30% in development status

The actual percentage of lynx forest type acres in development / non-development status will be slightly different. There are fewer lynx forest type acres than total forested acres, some acres of designated Wilderness or Roadless Areas are not lynx forest type, and there are other forest plan allocations such as Research Natural Areas, Big Game Winter Range, Non-motorized Recreation, etc. that are non-development.

The Forest Service will have more precise numbers. I urge you to request those acreages from the Forest Service and to incorporate those into the Five Year Review. If it would be helpful, I would be happy to discuss my calculations with you at your convenience.

Thank you for your consideration of these comments.

Sincerely,

Thomas A. Troxel

Thomas A. Troxel
Executive Director