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Forest Service

Belt Creek-White Sulphur Springs Ranger District

Helen Smith, District Ranger

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White Sulphur Springs, MT 59645

RE: 30 Day Comments on the Draft Environmental Assessment for the Proposed Coyote Divide Vegetation Project

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish, and the Center for Biological Diversity would like to submit the following comments and questions regarding the draft Environmental Assessment (EA) that has been released for public review and comment for the Coyote Divide Vegetation Project.

A. Terrestrial Vegetation Effects Analysis

1. This project includes 1,549 acres of clearcuts, including 64 units. Openings over 40 acres are 805 acres, or slightly over half of all the proposed clearcuts; these opening sizes are 289, 128, 121 and 267 acres. As is noted in the Vegetation Report at page 5, clearcutting requires that cuts are

carried out in a manner consistent with the protection of resources including wildlife; the basis for these clearcuts to protect wildlife was not addressed, nor was it ever addressed in the HLC RFP FEIS. The agency needs to provide this information on why clearcutting is the optimum method for managing wildlife, including clearcuts up to almost 300 acres in size planned for the Coyote Divide Project.

2. The Vegetation Report at 6 states that clearcutting is the appropriate method of harvest for the planned units given the current vegetation condition. There is no information provided, including referenced from the project wildlife report, why the current vegetation conditions are unsuitable for wildlife and need to be removed. This information needs to be provided to the public as to why clearcutting is being planned in this wildlife habitat. The impact of clearcutting on wildlife needs to be identified in the NEPA analysis for Coyote Divide, since there is no analysis of such in the draft EA of Wildlife Report.
3. The report notes that 3,049 acres of vegetation treatments are planned on lands unsuitable for timber production, but this is allowed because treatments will address other resource needs. These other resource needs identified did not include wildlife. If wildlife habitat is degraded due to management activities on unsuitable timber lands, where is this specifically allowed in the Revised Forest Plan (RFP)?
4. Fuels management is an activity, not a resource, as per management activities on unsuitable timber lands. Creating a mosaic of age classes is not a wildlife management activity due to the heavy fragmentation and loss of habitat that is involved. Addressing insect hazards is not a wildlife management activity, as wildlife benefit from insects and disease. The agency needs to be specific as to why wildlife management is not required on the management of unsuitable timber lands. Please provide this analysis in an updated EA and Wildlife Report.
5. The agency plans to alter vegetation on 834 acres in Inventoried Roadless Lands (IRAs). This is mostly a fuels management activity, which involves cutting trees and removing wildlife habitat. The agency did not identify as to why trees are causing habitat losses for wildlife, and thus must be removed to improve wildlife habitat. These include trees 8-12 inches dbh or smaller. It is unclear why wildlife don't use these trees. Why is the loss of

wildlife habitat not a loss of roadless area values? Please define why the trees that will be cut and burned are creating adverse habitat conditions for wildlife, and their removal will improve wildlife habitat, including for many Montana Species of Concern, and the threatened Canada lynx and its prey, the snowshoe hare. We will discuss effects in IRAs later in these comments as well.

6. The Vegetation Report at 11 states that prescribed burning will improve dry forests and grass-shrub areas. The shrub vegetation to be burned is not identified, but likely includes juniper, a highly important wildlife shrub. It may also include sagebrush, another highly important wildlife shrub. The agency needs to define why killing these shrub species is a wildlife benefit. It is also unclear why removing a forest understory is habitat improvement. The Vegetation Report at 35 notes that fuels treatments include rearrangement of fuels within the WUI. This includes removal of the forest understory within forest stands to reduce ladder fuels to reduce the likelihood of a canopy fire; the overstory portion of these units would largely be left intact and would increase growth of residual trees. What data is the agency using to determine that forest understories have no habitat value to any wildlife species? Also, it is also noted that crown fires will also occur, killing entire patches of forests along with the understory; this will create savanna conditions, while at the same time savanna areas in meadows is going to be removed. If savanna conditions are important to wildlife, why are they going to be removed in some areas, including burning and killing 40-60% of the forest within a given unit, with an acceptable limit of 35% tree mortality? Why isn't the killing of forests on an acre or less scattered across a treatment unit considered habitat fragmentation for wildlife? Also, information needs to be provided to the public as to why forest burning restores wildlife habitat in IRAs. Overall, please cite the science and monitoring that is being used to claim that slashing and burning wildlife habitat in IRAs improves habitat for all species, including the lynx.
7. The Vegetation Report at 24 notes that slashing and burning ecotones and forests within IRAs will increase forage for wildlife. It is unclear exactly what losses of forage will occur. Apparently, shrubs and trees do not provide any forage for wildlife, although the basis for this contention is not explained.

The agency needs to define why wildlife forage will be increased with tree and shrub removal through slashing and burning.

8. The agency is proposing to log old growth forests down to a few large trees, or to clearcut it. As per the criteria cited in the Vegetation Report, a two-aged seed tree cut is old growth management, as 5-40% of the trees will be maintained. As well, patch clearcuts in lodgepole pine is considered old growth management, because on average, there will still be 12 larger trees maintained in the cutting unit, supposedly qualifying it as old growth. Commercial thins in Douglas-fir forests also will still qualify as old growth as the stands would not be clearcut, even though 50% of the stand density will be removed, and thus the characteristics of these stands will be significantly modified. Somehow, this purpose, to increase growth of remaining trees, is also claimed to be habitat management for old growth-associated wildlife. What is unclear is why logging old growth maintains it's values for wildlife. There is no information in the RFP or associated FEIS as to how this has been determined. There is no information provided in the Vegetation Report as to how this has been determined. What is the basis for this claim?
9. The RFP states that a desired condition for old growth is to maintain or increase it at the 2018 levels. This is 11% across the Forest, and 14% for lodgepole pine. There is no information in the Vegetation Report as to first, clearcutting lodgepole pine maintains old growth, and second, how it has been determined that group selection cuts in lodgepole pine maintain their original values for wildlife and thus also "maintain" old growth. The acreage of logging Douglas-fir old growth in this project is unknown. Please define how these logging old growth treatments meet the desired conditions for old growth, since meeting the desired conditions for vegetation is repeatedly noted as the purpose of this project (e.g., Vegetation Report at 14, 19).
10. The Vegetation Report at 27 discusses the desired condition for snags, stating that existing snag levels are lacking in the lodgepole pine vegetation types. Yet there is no analysis of how old growth meets the RFP desired conditions. This information needs to be provided to the public.
11. The Vegetation Report at 25 states that pine beetles may cause old growth stands to lose their old growth qualities. This is quite amazing, since logging

most of the trees will supposedly maintain old growth, but bark beetles will cause the loss of old growth conditions by killing trees. Please define why bark beetles create conditions more severe than clearcutting as per old growth values for wildlife.

12. The Vegetation Report also notes that management for the Natural Range of Variation (NRV) at page 19 and 22 is a valid means of managing for ecosystem integrity, which is also the basis for the clearcut sizes to be planned for the Coyote Divide Project and elsewhere on the HLC. The RFP notes that the NRV for old growth is estimated to be 20-25%. The HLC is therefore below this NRV. However, this problem is never discussed in the Vegetation Report. What is the current level of old growth in the Coyote Divide Project Area, how does it compare to the NRV, and how is this being addressed?
13. Please provide an old growth summary for the entire project area, and define if it meets the desired conditions (11% total, 14% lodgepole pine, 8% Douglas-fir) identified in the RFP. Please also map this old growth for the project area. The Vegetation Report at 21 notes that is currently no map of old growth for the project area. It is unclear why this information was not obtained during project planning, in order to address RFP direction at a minimum.
14. The Vegetation Report at 22, Table 7, notes that the Coyote Divide Project will log 601 acres of old growth, including clearcutting 486 acres of lodgepole pine and commercial thinning of 115 acres of Douglas-fir. The Vegetation Report at 34 states that only 315 acres of old growth will be logged, however. This lower estimate appears to be the result of pockets of old growth within treatment units being measured, instead of the entire stand. The portions of units with old growth that are considered non-old growth will apparently be logged differently, although the option of removing all but a dozen or fewer trees for these non-old growth areas seems misleading, unless these non-old growth areas are clearcuts. The actual management of old growth is thus not clear, except for the claim that only a few trees can provide wildlife old growth. Only 5 trees per acre are required for Douglas-fir old growth, and only 12 trees per acre are required for lodgepole pine old growth. Since retention of lodgepole pine trees after logging is not possible due to windthrow, these stands are going

to be clearcut. The Forest Plan direction to support an abundance and distribution of old growth either as stable or increasing is not addressed as to how clearcutting lodgepole pine meets this desired condition. Is this desired condition considered optional?

15. The objective of logging Douglas-fir old growth to a target density of less than 100 square foot basal area is to reduce tree mortality to Douglas-fir bark beetle and spruce budworm. The Vegetation Report at 34 states that this will promote old growth by reducing mortality. It is not clear why mortality reduction is a management goal for wildlife, given that almost half of old growth bird species on the HLC require snags for nesting and foraging.
16. Before the agency continues to implement the RFP direction that logging including patch clearcuts in lodgepole pine maintain old growth values to wildlife, the supporting analysis needs to be provided to the public in a Forest Plan amendment, since currently no documentation of this claim has been provided to the public, as is required by the NEPA. The Vegetation Report at 35 notes that there is "some uncertainty" about treating old growth stands to improve forest conditions and reliance, monitoring is planned for treated old growth in the Coyote Divide Project to determine achievement of objectives (increased resilience and improved forest conditions) to inform treatment of future logging of old growth. This is specifically what our claim is as per the invalidity of the RFP direction for logging old growth. Effects to wildlife have never been assessed. Planning a monitoring program, including one without any monitoring of wildlife effects, after implementation of a Forest Plan program is a violation of the NFMA. The Vegetation Report at 35 also claims monitoring of old growth logging on the Flathead National Forest has indicated that objectives of reducing density, increasing large trees, and reducing fire risk was "largely achievable." This did not include effects on wildlife, however.
17. The proposed management of coarse woody debris has no connection to wildlife, even though this habitat is highly important to wildlife for cover and feeding sites. This management regime is a significant adverse impact on almost all wildlife species as a result. This includes adverse impacts to wildlife within IRAs, as burning will consume up to 30% of larger coarse woody debris. The basis for this being habitat improvement needs to be

provided for these IRA treatments. The agency needs to include a valid management program for coarse woody debris, including for species as the pine marten and red-backed vole, as well as the snowshoe hare, for this project.

18. The Vegetation Report notes that whitebark pine occurs throughout the proposed harvest units. Logging, or improvement cutting, is stated to improve the growth of older whitebark pine trees that are not destroyed during logging and site preparation, including burning, or burning in IRAs. The science that demonstrates that logging improves whitebark pine survival, including from pine beetles, needs to be provided, given there is evidence that logging does just the opposite -makes whitebark pine trees more vulnerable to pine beetles due to increased growth. Also, it is not clear how seedling and sapling whitebark pine will either be protected, or if destroyed during logging, why the loss of this recruitment does not significantly reduce the long-term population density of this proposed species. Also, the benefits to killing whitebark pine in IRAs due to various levels of prescribed burning, including stand replacement fires, is unclear. What is the basis for claiming that killing whitebark pine improves its persistence in the project area? In particular, the agency needs to map all locations of whitebark pine that occur in proposed treatment units, including in the IRAs, as the Vegetation Report notes that five-needle pines will be retained wherever found. If they are not surveyed, how can they be protected?
19. The Vegetation Report claims that improvement cutting will benefit aspen. This project area includes several grazing allotments. Field trips we have made to the Little Belt Mountains shows that livestock grazing on aspen is a severe environmental impact, an impact that is preventing aspen from recruiting. It is unclear why logging, instead of removing the cows, is a conservation strategy for aspen. The agency needs to provide the supporting data to show why logging, and not grazing management, is the management need for aspen.
20. The Vegetation Report at 18 states there is an average of 14 snags per acre across the Helena-Lewis and Clark National Forest (HLC). Fires and pine beetles are the primary source of snags. Id. In the project area, there is an average of 7.8 snags (over 10 inches dbh) in the warm dry snag analysis

group, and 5.6 snags/acre in the cool moist and cold snag analysis groups. Within treatment units, there is an average of 16.2 snags/acre in the warm dry analysis group and 10.3 snags/acre in the cool moist and cold analysis groups. The Vegetation Report did not define how many snags per acre would be left in improvement cuts and clearcuts. The level of snag reduction on treated acres as opposed to baseline conditions is not addressed, including why this would not be a significant reduction in snags that occur in treatment units after treatments. This information is required to be provided by the agency as per the NEPA. What is the expected change per acre of snags in treatment units, and why isn't this a significant habitat change for wildlife?

21. The Vegetation Report at 27 states that there is a shortage of snag desired levels in the cool and cold vegetation types. The desired versus existing snag levels is not, however, identified. Nor is it clear how clearcutting lodgepole pine will allow the agency to meet the desired levels of snags as per the RFP. Table 13 of the Vegetation Report shows that the current level of snags in the cold/cool vegetation groups of 5.6 per acre is below the RFP desired condition. How will this desired condition be met with the planned clearcutting?
22. The Vegetation Report at 27 also states that prescriptions for snag retention have not yet been identified. How is the public supposed to comment on snag retention practices in harvest units without this information? This information needs to be provided for public comment, as well as for the agency to define specifically what the snag retention practice will be in this project, instead of just providing vague claims that the RFP direction will be met.
23. The Vegetation Report does not address how long snags are expected to stand in treatment units, especially clearcuts. What is the expected snag density in clearcuts until snags are recuited in roughly 808-100 years? If there are no standing snags in the unit for most of the next rotation, how is the RFP snag management strategy actually valid for snags in harvest units? If the agency knows that snags will not stand long, why is this snag retention strategy considered a conservation strategy for wildlife. Please discuss the snag life in harvest units, and how this meets wildlife needs for

those few species that will nest in clearcuts, such as bluebirds, kestrels and flickers?

24. The Moose Creek logging project included many clearcut and improvement cut units (1,672 acres of clearcuts as per the Vegetation Report at 36). The amount of old growth forests logged in that ongoing project was not identified, including information on the 2018 level of old growth forests in the Little Belt Geographic Area (GA). The level of snag retention in harvest units within sampled units of that timber sale needs to be provided for the Coyote Divide Project, in order for the agency to define the expected level of snags that will occur in treatment unit. Please provide this information since it is monitoring information on agency management activities on wildlife habitat.
25. The RFP FEIS does not evaluate how retention of a few snags in logging units affects wildlife baseline conditions – populations that occurred in the forest prior to logging. It is a violation of the NEPA and the APA, as well as the NFMA, for the agency to suggest that leaving a few snags in logging units, although this is optional as per the RFP, maintains the pre-logging levels of birds. The HLC needs to complete an amendment to the RFP to include a valid management strategy for the 20-plus bird species that require snags in forests, not snags in openings. In addition, about half of snag-associated bird species on the HLC are associated with old growth forests. Management of these species requires protection of old growth, not optional snag retention in logging units. Currently the HLC snag management strategy, including as is being applied to the Coyote Divide Project, is a violation of the NFMA as it is creating vast, unmeasured declines of snag-associated species. The Coyote Divide Project, as currently planned, will have severe adverse impacts on snag-associated birds.These impacts are cumulative in nature, as this snag management strategy has been implemented on the HLC for decades, including in the Moose Creek logging project in the Little Belt Mountains, which is still ongoing.
26. The Vegetation Report at 19 makes an extensive proclamation that the forest needs to be managed as a "mosaic" of various conditions as a desirable condition, that this will make the forest "resilient." There has been no connection made between maintaining viable populations of forest wildlife with a "resilient" forest of various "mosaics." This is never

addressed in the RFP EIS. Currently, the agency management goals for resilient forests is devoid of any wildlife management basis, in violation of the NFMA. It is also a violation of the APA, because it is implausible that logging and burning forests ensures wildlife diversity and persistence. This assumes that all activities that reduce fire risks in forests is a benefit to all wildlife species by increasing their resilience. The basis for this assumption has yet to be provided by the HLC, in the RFP and associated EIS. Thus implementing this management strategy in site-specific projects is a violation of many laws, including the NEPA, the NFMA and the APA. Any management projects that require modification of wildlife habitat need to stop at this time until the agency does an actual analysis via a Forest Plan amendment to actually measure impacts to wildlife by managing to resilient landscapes.

27. The Vegetation Report at 19 states that clearcuts will move the project area towards the Desired Condition range for seedling/sapling size class. These openings will also improve a desired condition for a "mosaic" of conditions so that not all stands have the same susceptibility to pine beetles. Clearcutting is thus identified as an important management scheme to control insects and disease. This will help avoid large, contiguous areas of moderate to high insect hazard. The Vegetation Report noted that susceptible lodgepole pine stands are "dense," with a basal area over 100 square feet per acre; they reach susceptibility to pine beetles are roughly 80 years in age; pine beetles cycle through a lodgepole pine stand roughly every 20-40 years. Thus clearcutting lodgepole pine stands will eliminate the pine beetle cycle for roughly 80 years, which is the objective for clearcutting. The loss of the essential cycle of pine beetles for wildlife is thus lost with clearcutting, and is a direct and severe conflict between managing for a tree farm versus managing for wildlife. The RFP FEIS does not address this severe impact of clearcutting on wildlife. Until there is as Forest Plan amendment that addresses the severe impacts of clearcutting on cycles of pine beetle infestations essential for most forest wildlife, the agency is violating the NFMA by continuing to do any clearcutting.

28. The Vegetation Report at 22 notes that in clearcuts, subalpine fir is generally present in the understory; this key species for the lynx will be lost with clearcutting. The basis for removing this key lynx habitat with

clearcutting was not addressed, although this is a wildlife issue. The Vegetation Report at 25 notes that without clearcutting, these lodgepole pine stands will likely move into old growth conditions within a few decades. The Vegetation Report at 28 notes that it will be roughly 15 years before clearcuts return as winter snowshoe hare habitat, and thus as winter lynx habitat.

29. The Vegetation Report at 23 notes that forests provide an ecosystem service of carbon sequestration (uptake and storage); however logging to supposedly increase forest resilience is defined as a strategy to mitigate climate change. This amazing claim was supported by two papers, including by the same lead author. The vast amount of evidence that trees provide an important ecosystem service by sequestering carbon needs to be provided. The reduction in carbon sequestration that will result from the Coyote Divide Project needs to be provided via valid estimates, as is required by the NEPA, particularly given the current climate change crisis that is occurring world-wide.
30. The Vegetation Report at 35 states that 80% of 4,561 acres of fuels treatments are located within the Wildland Urban Interface (WUI). This would mean that 912 acres of fuels treatments occur outside the WUI. The actual delineation of the WUI was not provided in the Vegetation Report, but may be elsewhere in the project record. The issue is whether the WUI has been defined correctly, which is 1.5 miles within a community at risk.

B. Preliminary Wildlife Effects Analysis

1. There is actually no analysis of project impacts on wildlife in this report. This report could not have provided the basis for the agency concluding that the Coyote Divide Project would have no significant impacts on wildlife.
2. The report states that the RFP provides a framework to ensure that wildlife species and their habitats across the plan area are provided for within the Natural Range of Variation (NRV); however, there is no actual analysis that defines specifically what the NRV will be achieved, or how this will provide

habitat for any wildlife species on the HLC. Instead, the analysis of project impacts on wildlife are limited to vague, contorted, incomprehensible conclusions that wildlife will "persist" even if the project is completed. Of course wildlife will persist, but at what levels compared to current conditions? For example, the Wildlife Report at 1 states that the HLC Forest Plan does not include specific requirements for wildlife species; instead, it provides a framework to ensure those species (e.g., goshawk, migratory birds) and many other species and their habitats are provided for across the plan area within the natural range of variation. The Wildlife Report at 7 states that the project is "expected" to provide for the ecological conditions necessary to maintain the persistence of or contribute to the recovery of native species within the plan area; forested and nonforested vegetation will be available for wildlife species in the project and analysis area before, during and after the project is fully implemented; wildlife habitat and connectivity would remain within the project area and the Little Belts GA. Also for example, the Wildlife Report at 19 states that the forest vegetation report indicates the project area and GA at large are within, would trend towards, or otherwise would not be precluded from achievement of forested and nonforested vegetation plan components that provide the underlying capability of the area to support a diverse array of terrestrial wildlife species and their habitat. Also for example, the Wildlife Report at 23, Table 11, states that for terrestrial wildlife diversity, the project would not preclude achievement of Forest Plan direction related to terrestrial wildlife diversity. And the Wildlife Report at 28 states that the Forest Plan analysis demonstrated that plan components exist that provide for the suite of ecological conditions necessary to support wildlife and their habitat in the plan area (terrestrial wildlife diversity). Clearly, none of these incomprehensible claims constitute an analysis of project impacts to wildlife, including over 60 species of forest birds. Tiering a site-specific NEPA analysis to a nonexistent RFP FEIS analysis means there is no actual analysis provided. There is also no analysis of site-specific impacts on the Coyote Divide Project on any of the 60-plus species of forest/ecotone birds as well as most forest mammals, such as pine marten, northern flying squirrels, tree squirrels, etc.

3. Given that the RFP FEIS fails to complete any analysis of vegetation treatments, from logging to prescribed burning, on any wildlife species, including over 60 species of western forest birds, the RFP is invalid. It is proposing to implement vast changes in wildlife habitat without any analysis of wildlife impacts. The RFP is clearly in violation of the NEPA, the NFMA, the MBTA, and the APA, as it is impossible to state to the public that regardless of vegetation treatment to occur, there will be no significant changes to wildlife populations. Until the HLC RFP is amended to include management impacts on almost all wildlife, the agency cannot legally implement any more vegetation treatments.
4. The Desired Conditions for NRV do not include old growth for the Coyote Divide Project. This topic is not addressed; the level of current old growth in the project area is not identified; it is not mapped. Please define the DC for old growth in the project area, and provide a complete inventory of this old growth, along with a map; define how the existing level of old growth can be maintained, as is a DC for the RFP, when old growth will be logged including clearcuts. How can this logging maintain or increase old growth?
5. Please define wildlife old growth as per the Region 1 description in USDA 1999, as defined by Warren; this definition includes all the structural components identified in the entire Green et al. (1991) definition, instead of just the screening criteria of Green et al. (1991).
6. The RFP and associated FEIS do not include any information as to how logging and clearcutting old growth can maintain wildlife values. These values need to be addressed for the 8 bird species identified as associated with old growth in Table 1 of the Appendix D of the RFP FEIS, as well as the fisher and pine marten; how do the minimum criteria as per Green et al. (1991) maintain habitat values for these 10 old growth-associated species?
7. The list of old growth associated species in Appendix D of the RFP FEIS is actually deficient for many other species. In the Northern Rocky Mountains, there are roughly 27 bird species associated with old growth forests. The HLC has not defined how logging old growth will maintain habitat values for these 27 species. Unless this is done, the agency cannot claim that logging old growth maintains it values for wildlife, including in the Coyote Divide Project. Please support this claim with valid data and science.

8. The HLC RFP identifies 11% old growth as the desired condition for this planning period, where this level is either maintained or increased. There is not supporting documentation in the associated FEIS as to why this current level of HLC old growth should be the desired condition. This is a contradiction of the FEIS notation that the Natural Range of Variation for old growth is likely 20-25%. Since the stated management goal of the RFP is to replicate the NRV, then the DC for old growth should be 20-25%. This would also be supported by science recommendations for wildlife, including 20-25% for birds, 20% for the Northern Goshawk, and 25% for the Pileated Woodpecker. Until the HLC amends the RFP to provide a valid conservation strategy for levels of old growth forests, the agency cannot be completing any further logging, both of old growth and recruitment old growth. The Vegetation Report notes that many of the lodgepole pine stands planned for clearcutting would become old growth within several decades.
9. There was no discussion in the Wildlife Report as to how previous forest plan monitoring has identified that goshawk home ranges on the forest have an average of 14% old growth. There are 3 goshawk territories in the Coyote Divide Project Area. What is the current level and planned level of old growth in these 3 territories, and how will it compare to the levels documented in territories from forest plan monitoring?
10. Table 1 in Appendix D of the RFP FEIS identifies 13 bird species that use snag habitat for nesting and foraging. The RFP FEIS does not define why the "proxy" of average snag numbers across a landscape is a valid measure of the population status of these 13 bird species. Actually, across the Northern Rockies, there are roughly 28 bird species associated with snag habitat. The RFP FEIS has not cited any science or monitoring to demonstrate snag numbers is an indicator of population numbers of these 28 bird species. As such, use of average snag numbers within a project area where vegetation treatments are planned is an invalid measure of project impacts on wildlife. The use of snag numbers to indicate populations of associated species is thus a violation of both the NEPA and the NFMA. Please use actual population trends for 28 snag-associated bird species in the Coyote Divide Project Area to evaluate project impacts on these birds, based on the

amount of forested snag habitat that will be removed from vegetation treatments.

11. Evaluation of actual population trends of 28 bird species associated with forested snag habitat for the Coyote Divide Project is also required by NEPA not just because assessments of impacts must be valid, but as well, the NEPA requires that mitigation measures be adequately discussed as to their application and effectiveness. The possible retention of snags in harvest units, although not actually required by the RFP, needs to be discussed as to how this mitigates the loss of forested snag habitat to 28 associated bird species. Will they use this habitat in harvest units, and if so, how long will snags remain standing during the rotation period, of up to 80-100 years. Since there will essentially be no to little snag recruitment during the next 80-100 years, what happens to the 28 snag-associated bird specie during this 80-100 year interval?
12. A standard mitigation measure for snags on the HLC in the RFP is to claim that existing snags in adjacent areas to harvest units mitigate the loss of snags in harvest units. This is a violation of the NEPA, as snag habitat is being reduced, not mitigated by counting those snags that are not cut down. Please measure the loss of forested snag habitat required by almost all snag-associated bird species, and define the criteria by which these habitat losses are measured as per significant impacts on associated bird populations.
13. The HLC RFP is a violation of the NEPA, the NFMA and the MBTA by using a snag management strategy that has been demonstrated to be invalid almost 30 years ago; the HLC has never provided any monitoring data on how the previous Forest Plan snag strategy maintained populations of 28 associated bird species. There is no basis for carrying forward this invalid snag management strategy into the RFP, since it is not supported either by any existing science or Forest Plan monitoring. The HLC cannot continue any logging projects until the RFP is amended to address this issue and implement a valid conservation strategy for 28 bird species dependent upon forested snag habitat.
14. There is another logging project ongoing in the Little Belts, the Moose Creek Project. What is the amount of time that snags remain standing in those harvest units?

15. There are approximately 67 western forest birds that may occur on the HLC, including in the Coyote Divide Project Area. These include roughly 32 species of neotropical migratory birds. The current best science indicates there is a significant ongoing decline for many of these species (64%). There was no mention of this in the Coyote Divide analysis, even though the project will impact roughly 8,000 acres of bird habitat. It is clear that the contention that this project will have no significant impacts on birds was not supported with any actual analysis, in violation of the NEPA. Until such an analysis of project impacts on these 67 species of western forest birds is done, the level of habitat loss and resulting population declines of these species will not be provided to the public, as is required by the NEPA.
16. There are many Montana Species of Concern (SOC) as well as several U.S. Fish and Wildlife Birds of Conservation Concern (BCC) that occur in the Coyote Divide project area. Please identify all these species, along with their habitat needs, and define what the expected impacts will be on their populations.
17. The Northern Goshawk is a Montana SOC with three known territories in the Coyote Divide Project Area. Please map the postfledging (PFA) area designations for these 3 territories, based on forest plan monitoring of the average PFA size. If these PFAs are included in vegetation treatments, what forest plan monitoring data is being used to implement these treatments?
18. Forest Plan monitoring data indicated that clearcuts create barriers for juvenile goshawks; how are the planned clearcuts addressing this monitoring data?
19. The Forest Plan monitoring data also indicated that prey can be a limiting factor for goshawk territories, with some territories being "hunted out" and thus abandoned for several years. Since commercial thinning as well as clearcutting will reduce, and actually eliminate goshawk prey for at least 15-20 years for snowshoe hares, and up to 80-100 years for red squirrels and three-toed woodpeckers, how are the proposed vegetation treatments designed to maintain adequate levels of hunting habitat for this Montana SOC?
20. Please summarize the past forest plan monitoring on occupancy of goshawk territories up to the end of the 1986 planning period. What do these trends indicate; please provide this information in the record to be

available to the public, as it is a violation of the NEPA to incorporate additional information by reference within EAs.

21. Please provide a map of the 3 nest locales and PFAs that occur in the Coyote Divide Project Area, and include any planned treatments, including logging or burning, on these maps.

22. A HLC RFP guideline includes protecting raptor nests from disturbance, during the breeding season. There are at least 7 owl species, and 5 hawk species, that may occur in the Coyote Divide Project Area, based on Skaar (1996) bird distribution in Montana, and the owl surveys done in the Little Belt Mountains by Carlson in 1991. To date, there have been no apparent surveys for these 12 forest/ecotone raptor species. This information needs to be made available to the public before a decision is made, not after, as is required by the NEPA. This is also important baseline information, that defines wildlife conditions in this project area. Please provide the results of all raptor surveys in a draft EA so that this information is made available to the public. These survey results should be provided for all of the 8,000 acres where vegetation treatments are planned.

23. The NEPA requires that mitigation measures be thoroughly defined and discussed to the public. The Wildlife Report at 19 states that application of design features mitigates the possible effects to certain species, such as forest raptors. These design features are never identified or discussed. Please define what specific mitigation measures will be implemented for all of the 12 forest/ecotone raptor species that may occur in the Coyote Divide Project Area. What has the effectiveness of these measures been in ongoing projects, or as per the current best science for management of these 12 forest/ecotone raptors?

24. Since mitigation is only to protect raptors from disturbance during the nesting season, these mitigation measures are only temporary. Once the nesting season is done, the habitat is not required to be protected according to the RFP. As such, over the long term, these raptor species are going to be eliminated due to a lack of habitat conservation. This long-term impact will clearly be significant. As such, how has the agency determined that the Coyote Divide Project will not have significant adverse impacts to wildlife, including 12 species of forest raptors? Please define how this was determined.

25. The project includes an unknown number of treated acres on big game winter range, for both mule deer and elk. Please provide a map of the big game winter range, including by species, and define the acres planned for vegetation treatments within each unit on this winter range.
26. The RFP requires the agency to maintain the values of big game winter range. The Coyote Divide Project does not define how this will be done for the affected big game winter range, in violation of the NEPA. Just stating that big game winter range will be improved with burning is a conclusion, not an analysis. We want to see the analysis upon which this conclusion is based. Please define each planned vegetation treatment unit on big game winter range by acres along with a map; for each unit, please define the current vegetation for each unit, including density of various tree species, shrub species density, hiding cover and thermal cover; and define what the winter range will look like post-treatment for density of trees by species, density of shrubs by species, hiding and thermal cover; finally, please provide the published literature and any Forest Plan monitoring that demonstrates that big game populations increased as a result of these habitat modifications.
27. There was only a brief mention of winter logging in the Wildlife Report at page 10. Will this occur on big game winter ranges, and if so, why isn't this a violation of the HLC RFP? Why isn't this considered a significant adverse impact on big game? What level of winter disturbance over 15 years is considered tolerable by big game, and would not be an adverse impact?
28. It is impossible to determine from the wildlife analysis for the Coyote Divide Project, or the FEIS and RFP, what the definition of big game security is that is being applied to the HLC, including for the current project. Please provide a specific definition of elk security for cover conditions, distance from roads, size of cover block, and the scientific reference upon which this definition is based. We know of only 3 scientific collaborative reports or publications as per elk security, and all of these require hiding cover. If the HLC RFP definition of elk security does not require hiding cover, which appears likely, then any analysis of project impacts on elk security are invalid due to an invalid definition of elk security. Please provide a valid summary of elk security that is expected to occur for each year of the 15-year project, and if these levels meet the minimum 30% recommendations provided by elk biologists. If not, how if the Coyote Divide Project expected to avoid significant adverse impacts on elk?

29. Please provide a map of elk security currently, during, and after the Coyote Divide Project is to be completed. Please identify IRAs on these maps and all planned treatment units. Please include all unauthorized roads as open roads which disqualify elk security areas in the fall hunting season.
30. Please provide the active motorized route density, including unauthorized routes, for each of the 15 years the Coyote Divide Project is planned **FOR THE PROJECT AREA**. We would like to know direct impacts of this project from motorized route levels. Active motorized routes include any routes with at least 2 vehicle trips per 12 hours.
31. Since the agency has not yet completed the inventory of illegal motorized use in the Little Belts, and including the project area, why is the draft EA being released without this information? How will the public be provided an opportunity to comment on this illegal motorized use?
32. If a given year results in an active motorized route density of over 2 miles per section, or below a 50% HE, during the summer season, why wouldn't this trigger significant adverse impacts on elk during the summer season? How does the agency know significant displacement impacts will not occur to elk without this analysis, even though no significant impacts are indicated with an EA?
33. Please define the hunting district(s) that include the Coyote Divide Project Area. Please define the long-term trends for elk population numbers, which are likely over objective as per the RFP (6 of 8 hunting districts in the Little Belts are over objective). Since this is the best indicator of a lack of elk security, why aren't existing conditions for security considered a significant impact on elk? What criteria are used to determine when security becomes a significant adverse impact? It seems that the lack of existing security and elk displacement a documented issue, that additional roads (over 30 miles of new roads) along with the planned retention of a large number of unauthorized roads to remain in place during project activities, in some respects to be used for the project, it seems highly unlikely that the Coyote Divide project will not exacerbate existing significant impacts, or trigger such impacts during and after project activities. Even if roads are closed after treatments are done, they remain available for hunters and illegal ATV use. And the hiding cover required for security will be gone at least in all the planned clearcuts and prescribed burns for up to several decades or more. Cover will also likely be lost in

precommercial thinning units. It is also likely that hiding cover will be lost in commercial thinning treatments as defined by hiding 90% of an elk within 200 feet. The level of hiding cover provided in other recent logging operations, such as Moose Creek, need to be assessed for the Coyote Divide project. Do commercial thin units in that project retain enough cover for within-stand elk cover? Photos would be helpful for public understanding of effects of commercial thinning on hiding cover.

34. The Coyote Divide Project Area is in occupied grizzly bear habitat. The project will have an adverse impacts of any grizzly bears occurring in this area. There will be over 30 miles of new roads, that will be essentially permanent travel routes for hikers, hunters, and illegal ATVers. There will be significant displacement of bears for the 15 years of the project, including within core areas of the IRAs, meaning reductions in core habitat, including from burning and helicopter use. It is likely that the project will have measurable adverse impacts on grizzly bears as per the recommendations of 60% core habitats of at least 2500 acres in size, and an active motorized route density of no more than one mile per section. The draft EA notes that the project will adversely impact grizzly bears. As such, why doesn't this project require an EIS?
35. The HLC RFP is a violation of the ESA because there is essentially no management requirements for grizzly bears in occupied habitats such as the Little Belts, because it is classified as "Zone 3." How does a lack of any conservation measures for this threatened species within occupied habitat, including linkage habitat, meet the requirements of the ESA? The HLC RFP needs to be amended to provide specific conservation measures for grizzly bears in occupied habitats across the forest to promote recovery of this species, including population connections between ecosystems.
36. The Coyote Divide wildlife analysis claims that habitat connectivity will be maintained for the threatened lynx, but no actual analysis was conducted. There will be roughly 22.5% of this project area impacted by new treatment units of 8,000 acres. As per Holbrook et al. (2018), all types of vegetation treatments are avoided by lynx for many years, with restoration of lynx habitat use reaching only about half of pretreatment use levels in some unit types, including clearcuts, for up to and over 40 years. It is unclear why the creation of movement barriers, including clearcuts almost 300 acres in size,

would not significant change habitat connectivity levels for lynx in this habitat. The Little Belt Mountains is identified as a "linkage zone" for lynx in the 2005 USFWS Recovery Plan, as Figure 1 in the Northern Rockies Lynx Management Direction ROD. The data analysis to support the conclusion that this project will maintain lynx habitat connectivity needs to be provided to the public. This analysis is also needed for the agency to support claims that this project will not adversely impact lynx.

37. The current best science demonstrates that productive lynx habitat contains only 5% openings (Kosterman et al. 2018; Holbrook et al. 2019). This science is not being applied to the Coyote Divide Project, however. The Little Belt Mountains are historical lynx habitat as per MFWP maps and records. The agency is not managing this historical habitat by the current best science for lynx in order to maintain suitability for future lynx use (Kosterman et al. 2018; Holbrook et al. 2019). This means that lynx return to this mountain range is unlikely in the future, due to agency decisions. Why isn't the decision to not manage the Little Belt Mountains for lynx recovery considered a significant adverse impact on this threatened species, a decision that requires completion of an EIS?
38. The Wildlife Report did not address when the last surveys were conducted for lynx in the Little Belt Mountains, or in the Coyote Divide Project Area. It is unclear how the determination was made that it is not currently occupied by lynx. If the Little Belt Mountains are occupied by lynx, the agency is required to fully implement the NRLMD for lynx conservation.
39. The NRLMD will not conserve lynx habitat. For example, as per Table 2 in the Wildlife Report, LAU LB-03 is 15,940 acres of mapped lynx habitat; the NRLMD would allow 30% clearcut area, or 4,782 acres. Currently, there are only 129 acres of openings, so an additional 4,653 acres could be clearcut during the 15-year project. For LAU LB-08, there are 19852 acres of mapped lynx habitat; 30% could be clearcut, for 5,956 acres; with 314 current clearcut acres, there could be an additional 5642 acres clearcut in the LAU. For LAU LB-13, there are 28,435 acres of mapped lynx habitat; 30% clearcut acreage would be 8,530 acres allowed; with 1,224 current clearcut acres, the NRLMD would allow another 7,306 acres of clearcut. The Coyote Divide Project proposes only about 2,000 acres of clearcut, while the NRLMD would actually allow up to 17,601 acres of clearcuts over the 15 year

project. The current best science reports that only 5% opening, which also include natural openings, are present in productive lynx habitat (Holbrook et al. 2019; Kosterman et al. 2018).

40. The NEPA documents state that the proposed impacts on snowshoe hare habitat for the Coyote Divide Project occur within the Wildland Urban Interface. The map provided for the WUI does not appear to be a valid map as per the HRFA. Please define the WUI a per the HFRA, and how lynx habitat is being managed within this WUI.

41. Overall, we could not understand how the HLF RFP desired conditions to develop the NRV have any connection to any wildlife population, as there is no connection ever made in the RFP or FEIS. Worse, we could not even understand how the Coyote Divide Project will serve to achieve the NRV as defined by desired conditions. For example, the Little Belt GA has a desired condition for 35-43 percent lodgepole pine; the current percentage of lodgepole pine in this GA is identified in the Vegetation Report, Table 2, as 28%. Why would reducing lodgepole pine within the Coyote Divide Project help achieve the DC, when in fact it will further reduce a tree species that is already below the desired condition for that GA? Also, The desired condition for the Little Belts GA for Douglas-fir is 39-45%, while the current level in this GA is 42%. So Douglas-fir is at the desired condition for this GA, but it is being reduced with the Coyote Divide Project (again Table 2 in Vegetation Report). The analysis provided in the EA is different from that provided in the Vegetation Report, so it is clearly inaccurate. Thus the public has been provided incorrect information on how the agency is managing desired conditions in this project area. A correct version of this information needs to be provided in an updated draft EA to meet the requirements of the NEPA. The desired condition for the Little Belt GA for seedling/saplings, or clearcuts, is the same as the Forest-wide desired condition, or 3-18%. The current condition for seedling/saplings in the Little Belts GA is 4% as per Table 3 in the Vegetation Report. So the seedling/sapling desired condition is within the desired condition. The rationale for making several thousand acres of clearcuts to achieve the desired condition is unclear, as this is clearly incorrect.

42. An updated, corrected draft EA is required to be released to the public so that the agency can clarify why existing conditions that meet the desired conditions for seedlng/saplings, as well as percentage of lodgepole pine and Douglas-fir forests, will be altered even though they meet the RFP desired conditions. Since the project is stated as needed to meet desired conditions, even though these desired conditions are already being met, some corrections to this information being provided to the public is required in a new analysis released for public review and comment.

C. Analysis of Openings

1. On 11/21/22, NEC and AWR submitted extensive comments to the Forest Service regarding how clearcuts, including large clearcuts, create adverse impacts for a large number of wildlife species, including 60 or more forest birds. These comments were meant to demonstrate a high sensitivity of wildlife to clearcuts, with this sensitivity increasing with the size of openings. However, the agency has determined, with the release of a draft EA, that the clearcuts proposed for the Coyote Divide Project will not significantly impact wildlife. However, there was no analysis provided to support such inferences. The Wildlife Report makes a basic claim, apparently to suggest that openings have not have an effect on wildlife, because the NRV could include openings up to tens of thousands of acres. Although fires can create burned areas of many thousands of acres, the agency has never demonstrated that clearcuts are ecologically similar to burned forests, or forests infested with pine beetles. Actually, clearcuts are an unnatural ecological condition, and never occurred historically. As such, the agency currently has no basis for claiming that any clearcut acreage occurred in the NRV. As such, there cannot be a desired condition established for seedling/sapling acres established by clearcutting, since these never occurred naturally. As such, the agency's entire concept of using the NRV to justify clearcutting is flawed. An actual NRV for seedling/sapling forests would be the amount of burned forest, or forests infested with pine beetles. However, this natural ecological process is not included in the agency's NRV, which makes it even more invalid. The HLC

RFP needs to be amended to include a valid description of the NRV, which included burned forests, and forests infested with pine beetles, and would not include clearcuts. Until this is done, the agency cannot legally apply the RFP to vegetation treatments.

2. The HLC RFP FEIS does not include any analysis of clearcutting impacts on wildlife, of any size. The Coyote Divide Project NEPA analysis also does not include any analysis of clearcutting effects on wildlife, including clearcuts of any size. As such, the RFP as well as the Coyote Divide NEPA analysis are both invalid, due to a lack of analysis of vegetation treatment impacts on wildlife. This lack of analysis, a NEPA violation, triggers an NFMA violation as well, because a failure to identify adverse impacts of vegetation treatments of clearcutting means no coordination of clearcutting treatments with wildlife were needed. This inference is clearly a violation of the NEPA, the NFMA, the ESA, the MBTA, and the APA, due to expansive amounts of current science that demonstrate sensitivity of almost all forest wildlife to clearcutting.
3. As noted previously, the Little Belts GA is within the desired conditions for seedling/sapling age classes, or clearcuts. Meeting the desired conditions by clearcutting is thus not consistent with the HLF RFP for the Coyote Divide Project.

D. Management of Inventoried Roadless Lands

1. It is what specific conditions will be affected within the proposed treatments within the 2 IRAs. There is no information provided as to each treatment unit in regards to current vegetation or proposed vegetation. The number of tree species and their densities per unit are not identified. The average density and species of shrubs, including juniper and sagebrush, are not identified for each treatment unit. How these treatments meet the desired conditions for the Little Belt GA is also not provided. For example, it is likely that limber pine, a highly-valuable wildlife tree, will be slashing and burned within the IRAs. The RFP for the Little Belt GA at Table 81 shows that the Little Belts is within the desired range for both limber pine and juniper. This table also states that the desired condition indicate a need to generally maintain the extent limber

pine, juniper, lodgepole pine and whitebark pine. So it is unclear how these treatments will, as the agency claims, restore ecological functions of the IRAs since these conditions are defined as adequate in the RFP. So the agency needs to define specifically why vegetation treatments within the IRAs are consistent with the desired conditions for the Little Belt GA, or consistent with the HLC RFP. If the proposed treatments are not consistent with the RFP, then a Forest Plan amendment is required.

2. The NEPA analysis for the treatments within the 2 IRAs did not define specifically how ecological processes would be restored for wildlife. There will be significant habitat changes within treated areas, including a reduction in trees and shrubs, a loss of hiding cover, a loss of thermal cover, and a loss of nesting habitat for forest and ecotone birds. The agency needs to define why these habitat losses promote this multitude of wildlife species, which would be required if ecological restoration is a purpose of this treatment within the IRA. Many of the forest and woodland birds are Montana SOC or USFWS BCC, where management priorities will be important for their long-term persistence. The agency needs to define why reductions of these populations of many bird species promotes the value of IRAs.
3. The NEPA analysis for Coyote Divide make it clear that the actual purpose of slashing/burning in IRAs is to reduce fuels, particularly by removing the understory of forest stands, and removing trees and shrubs within ecotone areas. There is no information ever provided as to why these habitat features are not being used by wildlife, or are important to their persistence, including Montana SOC and USFWS BCC. There is a direct conflict between fuels management and wildlife management, as the fuels that are removed are also wildlife habitat. This conflict was not identified in the project NEPA assessments, in violation of the NEPA and the Roadless Rule.
4. The agency also failed to define why disturbances of IRAs, which are to provide security areas for wildlife, from big game to wolverines to grizzly bears, promotes ecological functions of the IRA. The claim that disturbances will be "temporary," or last intermittently for only 15 years, includes several reproductive cycles for both grizzly bears and wolverine. It was unclear what number of years is considered a "short-term" impact on these 2 wilderness species. How was 15 years determined to be "short term" based on the life cycles of these 2 species?

E. General NEPA/NFMA/APA/ESA/MBTA Violations

1. There is no action alternative that addresses the many issues we provided. This would include an alternative with no vegetation treatments but that actively eliminates a huge amount of road mileage in the project area, including unauthorized roads, instead of adding many miles of more roads, which will exacerbate existing adverse conditions for the grizzly bear and wolverine. There was no action alternative that would also address NEC and AWR's proposed alternative in their Objection to the HLC RFP to set aside roughly half of landscape watersheds for management as wildlife habitat; this would be half of the watersheds within the Little Belt Mountains, and include portions of the Coyote Divide Project Area.
2. There was no analysis for the Coyote Divide Project as to roughly how many forest birds will be killed from logging and burning activities; this information is essential to address project impacts on North American landbirds that are in significant decline, including 64% of western forest birds; since roughly half of forest birds and ecotone species are neotropical migratory birds, the agency needs to define how this project evaluates and promotes the conservation of these birds as per the MBTA.
3. There was no valid analysis of how this project will affect carbon sequestration, either for the Coyote Divide Project, or cumulatively, with the ongoing Moose Creek Project.
4. There was no analysis of how the Coyote Divide Project will increase the climate change impacts on forest birds, such as by increasing heat levels within the project area, and by increasing the impacts of severe weather events, in all seasons.
5. There was no valid analysis as to how the Coyote Divide Project will impact the threatened whitebark pine. Although many references were made to "improvement" of whitebark pine due to forest thinning, no documentation was provided. Published science has actually reported that increasing the growth of whitebark pine due to thinning will increase it's susceptibility to pine beetles in the future. As well, claims that destruction of whitebark pine seedlings and saplings will be compensated with increased regeneration in the future were not supported with any data.

Again, research has shown that recruitment of whitebark pine in areas of vegetation treatments and fire is almost nonexistent for at least 40 years. The total level of impact on whitebark pine was never identified, because there has been no inventory of this threatened tree species in the Coyote Divide Project Area, or treatment units.

6. The proposed action is a violation of the NEPA by being a 15-year project, or likely longer. This is similar to the planning period implementation for forest plans. The agency's analysis actually acknowledges that this time line may be problematic for grizzly bears, with female grizzly bears possibly using the project area within 15 years. It is also possible that female lynx could begin breeding in this area, as the NEPA analysis notes that this area of the Little Belts has one of the highest potentials for lynx occupancy, which occurred historically, and within 20 years. The effects of climate change are also increasing, and it is arbitrary of the agency to decide that climate impacts will not be addressed in the next 15 years for these public lands in the Little Belt Mountains. Also, with increasing fire frequencies in recent years due to climate change, the availability of green forests for wildlife, including forest birds, will become increasingly essential for their population persistence. Green forests in the Coyote Divide area will have increasing importance for forest wildlife, and this importance cannot be defined up to 15 years in the future. The agency provided no rationale as to why this project should not be consistent with the timeliness of the NEPA, or occur within 5 years. This project needs to be redesigned to fit within this 5 year completion date, since the agency cannot actually predict that the project will not have significant impacts 15 years from now. For example, this project may trigger violations of the Bald and Golden Eagle Protection Act if golden eagles, a Montana SOC, who population levels are unclear at this time, may experience significant future declines. The prescribed burning of woodlands and wooded shrublands in the Coyote Divide Project Area destroys/degrades habitat for this Montana SOC, so that the thousands of acres of prescribed burning would actually create adverse impacts for this species. With all the unknowns about wildlife population trends 15 years from now, the agency has no basis for assuming that the Coyote Divide Project will not exacerbate population declines.

F. General Summary of Many Issues and Conclusions

1. The timeline for this project violates the NEPA; the project needs to be limited to a 5-year timeline.
2. The project violates the Roadless Area Rule; claims that the affected IRAs have severe fire risks were not supported with any actual data; any area on the HLC has the potential for fire, so fuels management in IRAs is just a general management activities, not unique management required for IRAs. The agency did not provide any data to demonstrate the areas to be burned in the IRAs have a catastrophic fire risk; these risks were not defined nor measured.
3. The agency needs to inventory whitebark pine in all proposed treatment units, from logging to burning, so that impacts to this threatened species can be defined to the public.
4. The agency needs to complete the RFP direction to survey all proposed treatment units for a dozen species of forest raptors, so that this inventory information can be provided to the public.
5. The agency needs to define how the project meets the RFP desired conditions for lodgepole pine old growth.
6. Before this project can be implemented, the agency needs to complete amendments to the HLC RFP to define a valid conservation strategy for over several dozen wildlife species associated with old growth forests; the current RFP completely fails to protect the viability of these species, in violation of the NEPA.
7. Before this project can be implemented, the agency needs to complete an amendment to the HLC RFP to implement a valid conservation strategy for several dozen wildlife species dependent upon snags; the current snag management strategy was cited in science recommendations and publications to be invalid roughly 30 years ago; management of snag dependent species requires the provision of vast tracts of natural, undisturbed forests, especially lodgepole pine, where insect infestations occur every 20-40 years to create the pulses of forested snag habitat required by both woodpeckers and secondary cavity nesters.
8. Before this project can be implemented, the agency needs to amend the HLC RFP to include a valid conservation strategy for the Northern Goshawk

based on the extensive forest plan monitoring that was conducted during the previous forest plan cycle. This important information needs to be applied to forest management activities, instead of being tossed aside in the RFP.

9. Before this project can be implemented, the agency needs to amend the HLC RFP to complete a valid analysis as to how the proposed desired conditions for vegetation will ensure persistence of all forest wildlife. This claim requires a massive level of analysis and data, including for up to 80 or more birds that occur on the HLC. Currently, the RFP is a violation of the NEPA, the NFMA, and the MBTA because it does not demonstrate how bird populations on the HLC will be conserved during this next planning period.
10. Development of wildlife management strategies in the amended RFP need to be based on past forest plan monitoring, including continuation of the snag management and old growth management strategies in the 1986 Forest Plan. In a FOIA that NEC submitted to the HLC for monitoring reports from 2014-2021, the agency replied none were done.

Regards,

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