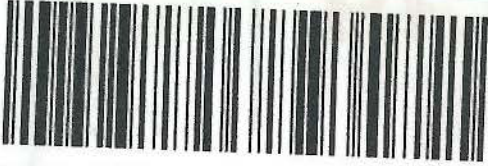


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November 6, 2023

To:

U.S. Forest Service

Reviewing Officer, Northern Region Office

Attn: Kootenai Forest Plan Amendment

26 Fort Missoula Road

Missoula, MT 59804

**RE: OBJECTION OF THE DRAFT DECISION MEMO FOR THE
KOOTENAI FOREST PLAN AMENDMENT FOR BEARS OUTSIDE
TH RECOVERY ZONE**

1. Objector's Names and Addresses

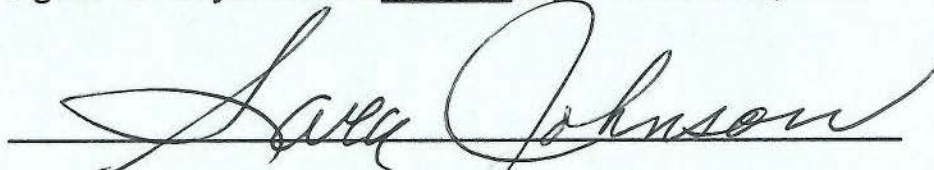
Lead Objector, Sara Johnson, Director, Native Ecosystems Council, PO Box 125,
Willow Creek, MT 59760; phone 406-579-3286; sjohnsonkoa@yahoo.com.

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT
59624; phone 406-459-5936; wildrockies@gmail.com.

Steve Kelly, Director, Council on Wildlife and Fish, PO Box 4641, Bozeman, MT
59772; phone 406-920-1381; troutcheeks@gmail.com.

Kristine Akland, Senior Attorney, Center for Biological Diversity, PO Box 7274,
Missoula, MT 59807; phone 406-544-9863; kakland@biologicaldiversity.org

Signed for Objectors this 6th day of November, 2023


Sara Johnson

2. Name of the Plan Amendment being Objected to.

Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone.

3. Name and Title of Responsible Official

Chad Benson, Forest Supervisor, Kootenai National Forest

4. Attachments

This Objection includes one attachment, Appendix A, which has hard copies of documents and/or reports cited in the Objection.

5. Connection between Prior Written Comments and Contents of the Objection.

On September 7, 2023, Objectors provided joint comments on the proposed Forest Plan Amendment for Bears Outside Recover Zones (BORZ), along with hard copies of literature and/or science cited in these comments. Although we agreed with the expansion of BORZ to include additional areas where grizzly bear use is occurring, we believe that all BORZ, both current and expanded, need to have valid conservation measures implemented for grizzly bears. The current Forest Plan direction for BORZ is invalid, and needs to be upgraded so that these areas actually promote grizzly bear use and occupancy, especially by female grizzly bears. This is particularly important for the recovery of the tiny grizzly bear population in the Cabinet-Yaak Recovery Zone, which most recently has been reported to be less than 50 bears. The current conservation within BORZ does not promote occupancy by female grizzly bears, and as such, is not providing connectivity between the Cabinet-Yaak Recovery Zone and the Northern Continental Divide Ecosystem (NCDE) Recovery Zone. Improved and valid conservation measures implemented in BORZ will in turn promote the recovery of the Cabinet-Yaak grizzly bear population by promoting connectivity to the NCDE Recovery Zone. The current Forest Plan direction for grizzly bears does not promote their recovery because in BORZ the density of open and restricted roads is not limited. There can be any amount of increase in linear miles of open and restricted roads for a specific project, hence the term "no net increase." We contended that this is a meaningless term, as it essentially notes that over time open and restricted roads will return to pre-project levels, but this timeline is unknown. This term would also apply to any subsequent projects within a given BORZ, with a permanent "net increase" of roads as a result. The term "no net increase" allowance means that essentially the linear miles of open and restricted roads can be any level within a BORZ at any time, so is not an actual standard. Standards need to be measurable. Also, the BORZ direction does not require a measurement of open and total road density, key factors in management of the grizzly bear. These measurements are instead replaced with "linear miles of permanent roads." Permanent roads apparently refers to open and restricted roads, but is not an accepted terminology for bear management (IGBC Taskforce Report 1998). And linear miles of permanent roads does not identify the open and total road density within BORZ, which is the accepted method to measure road impacts on bears. However, the draft DM for this Forest Plan Amendment did not

include an action alternative that applied the accepted method for measuring road impacts on grizzly bears, or open and total road density.

We also requested that the agency complete a valid assessment of the impacts of roads of various types on grizzly bears, including traffic levels of motorized vehicles, and non-motorized use, including hunters, hikers, and bikers, including mountain bikers. There was no such analysis in the draft DM. Without such an analysis, the agency has no basis for claiming the proposed management of bears within BORZ has no significant adverse impacts to grizzly bears, which would be an extraordinary circumstance.

We also requested that the agency include a requirement within BORZ for unroaded habitat, or security. The agency clearly needs to add a requirement for unroaded, secure areas within BORZ. Nor requirements for security areas within BORZ, however, was included in any action alternative. There was no action alternative, as well, that added BORZ to the existing Cabinet-Yaak Recovery Zone, as we requested. This expansion appears to be one factor that would promote a population increase of this precarious population.

Our objection includes the same issues we raised in our previous comments, as the agency did not respond to any of these issues. There was no action alternative developed that responded to any of these issues.

6. Remedy

As we have previously indicated and will demonstrate in the following summary of legal violations of the proposed Forest Plan amendment, the proposed amendment is a violation of the Endangered Species Act (ESA), the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), and the Administrative Procedures Act (APA). The proposed action involves extraordinary circumstances that prevent use of a Decision Memo, as this amendment continues to allow unlimited take of grizzly bears within BORZ. The

proposed action will continue the significant adverse impacts the current direction for BORZ is having on grizzly bears due to unlimited miles of open roads allowed within BORZ. Restricted roads that qualify as an open road, with moderate to high traffic levels as per the current best science, are not limited because they are not recognized by the Forest Service as an open road within BORZ. The current and proposed management direction within BORZ does not provide an actual measure of road impacts on grizzly bear, or road density, as is required by the current best science. Finally, the current and proposed direction for BORZ does not require any security for grizzly bears, even though, again, security is required as per the current best science. The continued implementation of inadequate protections to conserve and recover the grizzly bear within BORZ requires the completion of an Environmental Impact Statement (EIS), along with accepted methods to measure the ongoing "take" of grizzly bears. This EIS needs to include action alternatives that not only address public issues and concerns, but alternatives that adhere to the legal requirements of the NEPA and the ESA, which require use of the current best science to promote recovery of the threatened grizzly bear. Continued implementation of the current Forest Plan direction for BORZ also triggers a violation of the APA, as false conservation criteria, such as permanent roads and linear miles of roads, are being claimed to be acceptable science-based management of grizzly bears, when the current best science counters this claim. In addition, the NFMA is being violated by a failure of the agency to define how past management of BORZ for the last 8 years has met Forest Plan objectives of promoting conservation and recovery of grizzly bears in both BORZ and the Cabinet-Yaak Recovery Zone, including grizzly bear population size and persistence.

7. Summary of Legal Violations that the Proposed Forest Plan Amendment will Trigger or Perpetuate.

A. The proposed Forest Plan Amendment is a violation of the ESA, the NEPA, the NFMA, and the APA.

- 1. The agency has used the term “permanent” to define measures of both open and total roads within BORZ even though there is no scientific definition of permanent roads for grizzly bears; this definition allows the agency to dismiss the impacts of roads considered “not permanent” which results in what is likely a significant mileage of roads within grizzly bear habitat that is not identified as an adverse impact on bears.**

The proposed management in BORZ, and which will be continued with the proposed Amendment, uses road definitions that are never actually defined and are not identified in the IGBC (1998) definitions to be used in grizzly bear habitat. The road definitions developed by the IGBC (1998) are the scientific standard for identifying and measuring the impacts of roads on grizzly bears. The Kootenai National Forest (KNF) invented the “permanent road” which is not recognized by the IGBC (1998). This document identifies roads as: open road, has no restrictions; restricted road, use is restricted yearlong or seasonally with effective physical obstruction; and reclaimed/obliterated road, managed for the long-term intent of no motorized use as is treated in a manner to no longer function as a road. The IGBC (1998) also defines trails as open motorized trails or restricted motorized trails. The IGBC (1998) notes that motorized use of restricted roads is acceptable “at low intensity levels.”

We were also unable to locate any definition of what constitutes a permanent road in the KNF Forest Plan, the glossary, or Appendix B that defines management of grizzly bears in recovery zones and BORZ, or in the glossary of the associated Final Environmental Impact Statement (FEIS). Also, the 2023 Decision Memo for the proposed Forest Plan amendment cites Allen et al. (2023) as a reference document that defines how analyses of grizzly bear habitat should be completed. This document also does not include any definition of a “permanent road.”

The use of the term “permanent road” in the current and proposed continuation of management of grizzly bear habitat within BORZ is a violation of both the ESA and the NEPA because it has no actual meaning, and allows the agency to discount an unlimited miles of restricted roads that the agency classifies as

“temporary roads.” This definition means that as long as a road is classified as a temporary road that has an effective barrier, it essentially does not exist for grizzly bears until the barrier is removed for administrative use. Although it is recognized that restricted roads with low vehicle use (less than 10-20 vehicle trips per day as per Mace et al. 1996 and Northrup et al. 2012) will have less displacement impacts on grizzly bears than roads with moderate to high traffic levels (Wakkinen and Kasworm 1997; Proctor et al. 2019), these roads will still have the potential for nonmotorized human use, from hikers to bikers to hunters. Hunter use on closed roads is a recognized mortality risk to grizzly bears (Schwartz et al. 2010). The KNF discounting any adverse effect, and thus taking of grizzly bears, on restricted roads that are not considered a permanent road means that the current best science is not being used to implement an effective conservation strategy for grizzly bears within BORZ. In effect, the agency has implemented a conservation strategy, and plans to continue this strategy, that allows unlimited miles of restricted roads within grizzly bear habitat.

2. The agency does not identify the difference between an open and a restricted road.

It is not clear what constitutes an “open road” within BORZ. As was noted in the Kootenai Forest Plan Appendix B on grizzly bear management, within Recovery Zones open roads are defined by traffic levels. The effects of traffic volume has also been identified as a measure of road displacement effects on grizzly bears (e.g., Mace et al. 1996, with bears being displaced by traffic levels over 10 vehicle trips per day; Northrup et al. (2012) identified 20 vehicle trips per day as a significant displacement factor for grizzly bears). The Record of Decision for the Forest Plan Amendments to Incorporate habitat management direction for the Northern Continental Divide Ecosystem grizzly bear population (2018), at page 22 cites both of these papers on traffic level impacts on grizzly bears. The Kootenai Forest Plan direction for the Cabinet-Yaak Recovery Zone also requires limits on motorized traffic. So it is not clear why traffic levels were not considered as an important measure of restricted road use on grizzly bears in the BORZ amendment. When motorized traffic reaches a certain level, these roads are

"open" in regards to grizzly bears. So the proposed direction on open roads in the Amendment, as is carried forward from the initial management direction for BORZ, is inconsistent with the current best science. The claim that there will be no increase in permanent open roads within a BORZ is not correct, as there is no limit of permanent roads that have high uses of non-public vehicle traffic. The amendment provides false conclusions to the public on management of BORZ as a result as per roading impacts on grizzly bears.

- 3. We object to the allowance of "no net increase" of total roads within BORZ, as this allowance allows unlimited moderate to heavy nonpublic linear miles of roads within BORZ for an unspecified amount of time, with unmeasurable and unidentified levels of take of grizzly bears; these unmeasured impacts invalidate the use of a CE for this amendment.**

The "no net increase" of total roads within BORZ is clearly an unsupported conservation measure for grizzly bears. Use on restricted roads that are used for projects and have moderate to high traffic levels will have adverse displacement impacts on bears for an unlimited amount of time per BORZ. These unlimited roading impacts may result from any number of projects being implemented within a BORZ, with no project restrictions. The conservation value of this "no net increase" is never addressed in the proposed Amendment, nor in the original Forest Plan direction. The take of grizzly bears will increase during the allowed temporary increases of total roads when projects are implemented, including for many years, as was proposed for the Black Ram logging project. This current and planned allowance of increased take of grizzly bears during the occurrence of moderate to high traffic levels on restricted roads is not measured, in violation of the ESA.

- 4. The agency is using a false, invalid measure of habitat quality for grizzly bears as a conservation measure within BORZ, in violation of the NEPA and ESA.**

The Kootenai Forest Plan direction for BORZ uses existing linear miles of open roads per BORZ as a measure that must be maintained within a given BORZ. There is no current science that we are aware of that uses linear miles of roads as a measure of habitat quality for grizzly bears. This lack of any scientific basis for using linear miles of roads as a habitat management criteria for BORZ is noted in an agency review of management of BORZ by Allen et al. (2011) at 7. This white paper (not a scientific publication with peer review) noted the following in regards to use of linear miles of roads as a metric for grizzly bear habitat in BORZ, while at the same time noting that road densities are the metric to measure road impacts on grizzly bears: the value of BORZ areas to grizzly bears is currently unknown, and road density standards are not needed until these areas are added to recovery areas; bears using these BORZ are “apparently” tolerant of substantially greater levels of human disturbance than bears in BMUs; the current size of BORZ are highly variable, and boundaries are not static; BORZ units cannot be compared with each other. These various justifications for a failure to use a standard habitat measure for grizzly bear habitat, or density of open and total roads, appear to be rationales to avoid implementing the current best science for grizzly bear management, as is required by the NEPA and the ESA, so as not to interfere with timber production. As just one example, the agency has no actual data that bears in BORZ are more tolerant of roading impacts than bears within Recovery Zones. Allen et al. (2023), the Montana/North Idaho Terrestrial Consultation Technical Team article, Guide to effects analysis: motorized access in grizzly bear habitat outside the recovery zone, includes the following notation at page 8: research ranging from GYE to Canada shows that grizzly bears react essentially the same to motorized access inside and outside recovery zones, with similar predictive relationships for disturbance and survival.

Allen et al. (2023) also addressed the use of linear route density versus linear miles of roads, including at page 12 that linear route density has been used since the 1980s to set and track habitat security for grizzly bears; and at pages 13 that linear miles of motorized routes (without a density) is not a metric found in the grizzly bear research to define selection of home ranges or survival of individual grizzly bears, and that grizzly bear research does not support this as a useful metric in defining female selection of home ranges, subsequent reproductive

success and/or survival of individual bears; and at page 15, there is no direct applicable supporting research on effects of linear miles of roads to individual/populations of grizzly bears, such as avoidance and/or mortality.

The standard, accepted scientific measure of road impacts to grizzly bears has been, and continues to be, road density (e.g., the 1993 Grizzly Bear Recovery Plan, Mace et al. 1996, Wakkinen and Kasworm 1997, the Montana Fish, Wildlife and Parks 2013 Grizzly Bear Management Plan for Southwestern Montana, Proctor et al. 2019, and Proctor et al. 2022). Linear miles of roads, open or restricted, do not define grizzly bear habitat quality. This is clearly demonstrated in the Kootenai Forest Plan, Appendix B, description linear miles of open and total roads within the 4 BORZ for that Forest. Table 26 in Appendix provides the following information:

West Kootenai BORZ: 265 square miles; total roads 615, or 2.3 miles per section; open roads 316 miles, or 1.2 miles per section.

Cabinet Face BORZ: 42.3 square miles; total roads 164, or 3.9 miles per section; open roads 128, or 3.03 miles per section.

Clark Fork BORZ: 157 square miles; 256 miles total roads, or 1.6 miles per section; 178 miles open roads, or 1.1 miles per section.

Tobacco BORZ: 417 square miles; 1,124 total road miles, or 2.7 miles per section; 867 open road miles, or 2.1 miles per section

Three of these BORZ exceed the 2 miles per section of total roads that significantly reduces grizzly bear habitat use (Mace et al. 1996; Wakkinen and Kasworm, 1997). Three of the 4 BORZ exceed the one mile per section of open roads recommended for grizzly bear habitat use (Mace et al. 1996; Wakkinen and

Kasworm 1997; 1993 Grizzly Bear Recovery Plan, MFWP Grizzly Bear Management Plan for Southwestern Montana, Proctor et al. 2019; Proctor et al. 2022). It should be noted that in spite of additional, more current research, **the recommended level of open roads for grizzly bear conservation has remained at roughly one mile per section since first noted in 1993, or essentially 30 years ago.**

The best science regarding management of grizzly bears as per roads, with a measure of open road densities, is never considered in the Kootenai Forest Plan amendment for BORZ. In fact, the baseline open road densities (of just permanent roads) that are allowed in BORZ are never even identified in the draft DM, a surprising lack of information on road impacts on grizzly bears. We had to obtain this information by referring back to the original Forest Plan information provided in Appendix B. Without any analysis of how the actual open and total road densities affect grizzly bear conservation within the BORZ, the Forest Plan amendment is clearly a violation of the NEPA and the ESA. Analysis of planned open road densities is an essential measure of conservation values of BORZ to grizzly bears.

5. The proposed Forest Plan Amendment for BORZ provides false information to the public regarding that there will no “no net increase of total roads” allowed.

The agency’s claim that the ongoing management of BORZ prevents “no net increase” of total roads is meaningless, as there is no actual time limit for when a temporary increase is allowed. A given project is roughly 5 years, as per the glossary for the Forest Plan Amendments to Incorporate Management Direction for the Northern Continental Divide Ecosystem Grizzly Bear Population. However, recent projects proposed, including the Black Ram and Knotty Pine projects, would last much longer, up to several decades. Thus the claim that there would be “no net increase” in total roads in a BORZ has no actual meaning as per limiting road impacts to grizzly bears, since any temporary increases are allowed during project implementation, and there is no restrictions on traffic levels of project roads. Any mileage of barriered roads can be opened for projects, as well as any new miles of temporary road construction.

6. The key importance of security habitat for grizzly bears is not addressed in the ongoing and proposed management for BORZ.

The importance of security habitat for grizzly bears has been consistently identified as an essential factor in grizzly bear conservation (e.g., Wakkinen and Kasworm 1997, Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area 2007, Schwartz et al. 2010, Proctor et al. 2019, Proctor et al. 2023, and Allen et al. 2023). Security habitat for bears exists in areas over 0.3 miles from an active motorized route (IGBC 1998). In the Greater Yellowstone Ecosystem, grizzly bear security areas have been defined by the average daily home use of grizzly bears. Mattson (1991) estimated such security areas needed to be roughly 4-8 km in diameter to provide buffers for bears wary of humans, and roughly 5,400 acres in size. Mattson (1993) later defined the minimum size of security areas as roughly 7,000 acres. In 1997, Wakkinen and Kasworm noted that a minimum size of grizzly bear security areas in the Northern Continental Divide Ecosystem, where daily foraging use may be lower due to high habitat productivity, was estimated at 1,280 acres, but a maximum size would be 5,120 acres. More recently, Proctor et al. (2019) and Proctor et al. (2023) have reported that 60% of a bear's home range should provide security, preferably in patches of at least 2500 acres, to promote recovery. Also recently, Sells et al. (2023) reported that an important factor in habitat selection of female grizzly bears is distance to security.

Although Allen et al. (2023) referenced Schwarz et al. (2010) as a citation for providing grizzly bear security areas of only 10 acres, this is an invalid citation. First, the original basis for the 10-acre security area would have to be cited, not a citation in an article/publication. Schwarz et al. (2010) did not propose the 10-acre security area for grizzly bears, including based on their research program. Instead, Schwartz et al. (2010) never actually cited any reference for this 10-acre security area. The "implication" in Schwarz et al. (2010) is that this 10-acre security area was developed by the IGBC (1998) by also citing the distance habitat must be away from roads in security areas, a definition that actually was included in the IGBC (1998). Currently, there is no scientific basis for the 10-acre minimum

size of a grizzly bear security area. Although this 10-acre minimum size of a grizzly bear security was defined in the 2007 Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area, Figure 10 at page 41, no reference for this definition was cited. To date, we are not aware of any scientific report that used data to define 10 acres of suitable security for the grizzly bear.

In general, landscape planning is required to provide valid quite large (at least several square miles) patches of security areas for grizzly bears, an essential level of planning that is not occurring for grizzly bears in BORZ on the Kootenai National Forest. Because of no inclusion of any requirements for security, along with no limits on open and total road densities, the conservation value of BORZ are nonexistent. These areas will likely have no better habitat quality for grizzly bears than other areas of the forest without any current grizzly bear use.

As a basic requirement of the NEPA and the ESA, the agency is required to evaluate how the proposed amendment, which is being continued from the 2015 Forest Plan, affects and promotes the conservation and recovery of the grizzly bear. This analysis requires a complete measure of existing and allowed security areas based on the density of total roads within BORZ.

7. The management of motorized trails within BORZ is not clear.

The management of motorized trails within BORZ is unclear. The descriptions of total and open roads in BORZ in the Kootenai Forest Plan does not identify motorized trails. If motorized trails are not limited in any manner within BORZ, the agency needs to evaluate how this allowance will affect conservation values of the BORZ, currently and as proposed. The impact of motorized trails is a recognized impact on grizzly bears as per the IGBC (1998), which stated that motorized trails need to be measured within grizzly bear habitat.

8. The agency did not define why the current direction for BORZ should continue to be implemented without any changes in conservation measures for the grizzly bear, in violation of the NFMA.

Wakkinen and Kasworm (1997) reported an estimated 30-40 grizzly bears in the Cabinet-Yaak Recovery Area. The population trend in this recovery zone is not addressed in the proposed Forest Plan Amendment. Since the BORZ connecting this recovery zone to the NCDE are heavily roaded without any designated security areas, these BORZ are apparently having a very limited ability to provide a connection between these two recovery areas. It is not clear at this time if there is any actual movement of NCDE bears into this other recovery area, as this was not addressed in the proposed amendment. The current estimated grizzly bear population in the Cabinet-Yaak Recovery Zone is down to about 40 bears, due to the recent mortality of another female grizzly bear, a bear with 3 cubs, which is essentially about the same number of grizzly bears as were present back in 1997, or almost 30 years ago. As summarized in CV 22-114-M-DWM 2023, in 2017 the estimated minimum count of grizzly bears was 54 individuals, including 21 female grizzly bears; in 2019, the FWS detected 50 bears, including 14 female bears; in 2020, the FWS detected 45 bears, including 14 females; the FWS best estimate of bears in this recovery zone in 2012 was 48-50 bears, and with a calculated growth rate, estimated an increase of 7 bears by 2020, bringing the population to 56 bears; the estimated finite rate of increase was 1.017 for the period of 1983-2020, based on a small sample size; the court noted that FWS methods of population estimates ignored the reality of documented grizzly bear mortalities within the Cabinet-Yaak Ecosystem; while not required to use the minimum count method to create an environmental baseline, the FWS may not ignore the issue of female bear mortality altogether because to do so ignores an important aspect of the problem that the agency itself acknowledges.

In effect, the grizzly bear population in the Cabinet-Yaak Recovery Zone has not substantially increased in the last 25-30 years, with continued levels of high female mortality and what appears to be a lack of supplementation of this population from the adjacent NCDE via BORZ. This indicates that the current

management strategies for this Recovery Zone and adjacent occupied bear habitats in BORZ is having questionable effectiveness in recovering this small grizzly bear population. As such, the agency needs to provide an analysis of why this current conservation strategy does not appear to be working since the agency is proposing to continue this strategy in current and expanded BORZ. The agency's failure to look at how BORZ have apparently functioned since the 2015 Forest Plan was implemented in addressing changes to BORZ is a violation of the NFMA, which requires monitoring of how ongoing management direction in a Forest Plan is working, and possibly, to identify changes that are needed to increase attainment of Forest Plan goals, objectives and standards. It is clear, based on the current best science and the population trends in the Cabinet-Yaak Recovery Zone, that improved management of BORZ is needed to improve the population trend in this recovery zone.

9. The agency failed to include any action alternatives in the proposed Forest Plan Amendment on BORZ that address public issues and concerns, in violation of the NEPA.

There was no action alternative included in the proposed Forest Plan amendment that addressed the issues and concerns that we provided in our September 2023 comments. There is no action alternative that uses the current best science to guide management of roads in BORZ, based on road density levels, requires limits of motorized traffic levels on restricted roads, and recognizes the adverse impact of restricted roads with low motorized traffic levels. There is also no action alternative that requires any level of security for grizzly bears within BORZ, even though the current best science clearly identifies security as an essential habitat requirement for quality grizzly bear habitat. None of these concerns were addressed in the single action alternative being proposed, meaning that the agency did not consider any of our issues and concern, in violation of the NEPA. This addressing of public issues and concerns requires the agency to have at least one action alternative that addresses public issues and concerns.

Appendix A for the Objection filed against the Forest Plan Amendment for Bears Outside the Recovery Zone by NEC, AWR, CWF, and CBD.

Appendix A contains hard copies of the following publications and/or reports; references provided earlier in our September 7, 2023 comments on this proposed amendment are not included, including Mace et al. (1996), USDI (1982), MFWP (2013), and Proctor et al. (2019). Also, references provided on the agency's web page for this project are not included, including Allen et al. (2011), and Allen et al. (2023).

IGBC. 1998. Interagency grizzly bear committee taskforce report. July 29, 1998.

Interagency Conservation Strategy Team. 2007. Final conservation strategy for the grizzly bear in the Greater Yellowstone Area.

Mattson, D. 1991. Micro-scale security areas for Yellowstone grizzly bears. Interagency grizzly bear study team, Forest Sciences lab, Bozeman, MT.

Mattson, D. 1993. Background and proposed standards for managing grizzly bear habitat security in the Yellowstone ecosystem. Cooperative Park Studies Unit, College of Forestry, Wildlife and Range Science, University of Idaho, Moscow. 83844.,

Northrup, J., J. Pitt, T. Muhly, G. Stenhouse, M. Musiani, and M. Boyce. 2012. Vehicle traffic shapes grizzly bear behavior on a multiple-use landscape. Journal of Applied Ecology. <https://doi.org/10.1111/j.1365.2012.02180.x>.

Proctor, M., C. Lamb, J. Boulanger, A. MacHutchon, W. Kasworm, D. Paetkau, C. Lausen, E. Palm, M. Boyce, and C. Servheen. 2023. Berries and bullets: influence of food and mortality risk on grizzly bears in British Columbia. Wildlife Monographs. DOI:10.1002/wmon.1078.

Schwartz, C. M. Haroldson, and G. White. 2010. Hazards affecting grizzly bear survival in the Greater Yellowstone Ecosystem. Journal of Wildlife Management 74:654-667.

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USDA. 2018. Record of Decision for the Forest Plan Amendments to incorporate habitat management direction for the Northern Continental Divide Ecosystem grizzly bear population. USDA Forest Service, Northern Region.

Wakkinen, W., and W. Kasworm. 1997. Grizzly bear and road density relationships in the Selkirk and Cabinet-Yaak Recovery Zones. Idaho Department of Fish and Game, U.S. Fish and Wildlife Service.