



January 29, 2024

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Submitted via objection webform at

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=44089>.

Re: Objections to the Nez Perce Clearwater National Forest 2023 Land Management Plan Revision, Draft Record of Decision, and Final Environmental Impact Statement

Responsible Official:, Cheryl Probert, Forest Supervisor for the Nez Perce-Clearwater National Forests, 1008 Highway 64, Kamiah, Idaho 83536, 208–935–4239. The Responsible Official for the identification of the species of conservation concern for the Nez Perce-Clearwater National Forests is Leanne Marten, Northern Region Regional Forester, 26 Fort Missoula, Missoula, MT 59804.

The Sierra Club submits the following objections in regard to the Nez Perce Clearwater National Forest 2023 Land Management Plan Revision (2023 Forest Plan), Draft Record of Decision (DROD) and Final Environmental Impact Statement (FEIS) on behalf of more than 3,300 members in Idaho and 2,800 active members in Montana and approximately 690,490 members nationwide.

This forest plan revision comes at an unprecedented time in the history of our region, the nation, and globally. We are in the midst of a climate crisis and an interconnected extinction crisis – the first mass extinction directly caused by human actions – with one million species at risk of being gone forever. The 2023 Forest Plan will be in place for at least the next two decades, and it is imperative that it be forward-thinking in attempting to address these crises and to position us in the best place possible for a challenging future. Now is not the time to put the health and well-being of our public lands, waters and wildlife in second place. Many scientists, Indigenous leaders, conservation groups and others have embraced the “Nature Needs Half” concept and are working to enact policies and practices to conserve 50 percent of the Earth’s remaining natural systems by 2050. The Nez Perce Clearwater National Forest (NPCNF) can and should play a significant role in helping to meet that goal by enacting the strongest protections possible for the wildlands, waters and wildlife of the Forest.

Formed in 1892, the Sierra Club is the nation’s oldest and largest environmental advocacy organization. Our mission is to explore, enjoy, and protect the wild places of the earth; to practice

and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment and to use all lawful means to carry out these objectives. We have a long history of working to protect wildlands and wildlife in Idaho and Montana generally, and in specifically protecting and connecting grizzly bear populations and public lands between the Cabinet-Yaak Ecosystem, Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) for grizzly bears and other wide-ranging species. Our members spend substantial time on the NPCNF to view wildlife, to experience solitude and inspiration, and to pursue a wide variety of educational and recreational pursuits. Our members and supporters also understand that management of our national forests transcends personal interests, and recognize the critically-important role that the NPCNF plays in maintaining the health of the entire Northern Rockies region as well as the well-being of rare and imperiled species including grizzly bears, Canada lynx, and wolverines, among others. Keeping the NPCNF's remaining wildlands and rivers intact is essential in achieving connectivity between the NCDE and GYE for wide-ranging animals such as grizzly bears and many other species, as well as the heart of the Bitterroot Ecosystem, and for providing refugia for wildlife in a warming climate.

We recognize and appreciate the significant amount of work that the Forest Service has undertaken in drafting the new 2023 Forest Plan, FEIS and associated assessments and other documents over the past several years as well as the efforts to involve the public in this important plan revision. We do, however, have significant outstanding concerns, particularly in regard to potential adverse impacts on wildlife and achievement of connectivity between the NPCNF and other national forests and public lands for grizzly bears and other species. We hope these concerns will be addressed in the objection process.

Standing to File Objection

The Sierra Club has submitted timely, detailed comments in the forest plan revision process, including on comments on the Draft Plan/Draft Environmental Impact Statement (Draft Plan/DEIS) for the NPCNF, submitted on April 20, 2020. The issues raised in our objections herein are based on these previously submitted comments because we believe that the Forest Service has not adequately addressed the concerns we raised in previous stages of the forest plan revision process.

Request for Resolution Meeting

Pursuant to 36 C.F.R. Section 218.11(a), the objector requests to meet with the reviewing officer to discuss and resolve these objections.

Objection 1. The 2023 Revised Forest Plan does not meet the standards of the National Forest Management Act (NFMA) with respect to planning for wildlife connectivity.

On page 12 of our Draft EIS comments Sierra Club described the requirements of the National Forest Management Act with respect to connectivity:

“The 2012 National Forest Planning Regulations contain specific planning obligations for the National Forest units to fulfill. In particular, the new regulations have substituted two provisions §219.8 and §219.9 for the 1982 regulations’ “maintain viable populations of forest vertebrates” standard. These new sections seek to meet the mandate of NFMA that

forest plans “provide for the diversity of plant and animal communities...” 16 USC §1604(g)(3)(B). In relevant part §219.8 states:

(a) *Ecological Sustainability*. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure function, composition, and connectivity, taking into account:

- (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area.
- (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.

In parallel language §219.9 Diversity of plant and animal communities, in relevant part, states:

- (a) Ecosystem plan components. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity.”

The revised 2023 plan contains only two standards or guidelines that could be construed as dealing with connectivity:

FW-GDL-WLMU-01 New fencing installation or reconstruction should be designed to reduce barriers to wildlife movement, except when fencing is for the purpose of restricting wildlife movement.

MA2-STC-WL-01. New NFS motorized trails open to the public should not be authorized in Idaho Roadless Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This standard does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

These limited standards and guidelines do not represent what is needed to provide ecological integrity of the plan area, as required by the NFMA. They are limited and do not encompass the effects of timber harvest or fuel management on cover, as two examples. They do not address the influence of human presence on the wildlife permeability of the landscape for wide-ranging species such as grizzly bears or wolverines and, in fact, standard MA2-STC-WL-01 refers to the lack of protection provided by Idaho Roadless Rule designation on lands outside recommended wilderness and allows development of new motorized trails in Idaho Roadless Areas. A fencing standard only addresses one issue for large ungulates such as elk that are also sensitive to human presence and roads/motorized trails.

The NPCNF plan relies on Idaho Roadless Rule status of lands, primarily on the Clearwater, and recommended wilderness designation for connectivity across the Clearwater portion of the forest. It

does so despite the overall **reduction** in recommended wilderness, including elimination of North Fork Spruce and Sneakfoot Meadows roadless area (DROD p.30), opening portions of Hoodoo roadless area to over-snow motorized and summer mechanized transport (thereby excluding significant portions previously designated recommended wilderness) (DROD p. 31-32). Sierra Club requested that Bighorn-Weitas, North Lochsa and Lochsa Face, plus the Alternative Z recommended wilderness all receive that protection to provide secure wildlife connectivity (Sierra Club April 20, 2020 comments, p.9).

The Idaho Roadless Rule (36 CFR Part 294; Fed Reg 73 No. 201 p61456) does not provide adequate standards for connectivity. Motorized use is not restricted by that rule (36 CFR 294.26(a)):

(a) Motorized travel. Nothing in this subpart shall be construed as affecting existing roads or trails in Idaho Roadless Areas. Decisions concerning the future management of existing roads or trails in Idaho Roadless Areas shall be made during the applicable travel management process.

Nor is mechanical transport limited by it (36 CFR 294.26(c)):

(c) Motorized equipment and mechanical transport. Nothing in this subpart shall be construed as affecting the use of motorized equipment and mechanical transport in Idaho Roadless Areas.

Timber harvest and fuels management are permissible in backcountry/restoration classified (BCR) Idaho Roadless Areas under certain circumstances (36 CFR 294.24(c)):

(c) Backcountry/Restoration. (1) The cutting, sale, or removal of timber is permissible in Idaho Roadless Areas designated as Backcountry/Restoration only:

(i) To reduce hazardous fuel conditions within the community protection zone if in the responsible official's judgment the project generally retains large trees as appropriate for the forest type and is consistent with land management plan components as provided for in § 294.28(d);

(ii) To reduce hazardous fuel conditions outside the community protection zone where there is significant risk that a wildland fire disturbance event could adversely affect an at-risk community or municipal water supply system. A significant risk exists where the history of fire occurrence, and fire hazard and risk, indicate a serious likelihood that a wildland fire disturbance event would present a high risk of threat to an at-risk community or municipal water supply system;

(iii) To improve threatened, endangered, proposed, or sensitive species habitat;

(iv) To maintain or restore the characteristics of ecosystem composition, structure, and processes;

(v) To reduce the risk of uncharacteristic wildland fire effects;

(vi) For personal or administrative use, as provided for in 36 CFR part 223;

(vii) Where incidental to the implementation of a management activity not otherwise prohibited by this subpart; or

(viii) In a portion of an Idaho Roadless Area designated as Backcountry/Restoration that has been substantially altered due to the construction of a forest road and subsequent

timber cutting. Both the road construction and subsequent timber cutting must have occurred prior to October 16, 2008.

Temporary roads or road reconstruction can be allowed in those cases (36 CFR 294.23(b)(2) and (3)):

(2) A responsible official may authorize temporary road construction or road reconstruction for community protection zone activities pursuant to § 294.24(c)(1)(i) if in the official's judgment the community protection objectives cannot be reasonably accomplished without a temporary road.

(3) The Regional Forester may approve temporary road construction or road reconstruction to reduce hazardous fuel conditions outside a community protection zone where in the Regional Forester's judgment the circumstances set out below exist. Temporary road construction or road reconstruction to reduce hazardous fuel conditions under this provision will be dependent on forest type and is expected to be infrequent.

(i) There is a significant risk that a wildland fire disturbance event could adversely affect an at-risk community or municipal water supply system pursuant to § 294.24(c)(1)(ii). A significant risk exists where the history of fire occurrence, and fire hazard and risk, indicate a serious likelihood that a wildland fire disturbance event would present a high risk of threat to an at-risk community or municipal water supply system.

(ii) The activity cannot be reasonably accomplished without a temporary road.

(iii) The activity will maintain or improve one or more roadless characteristics over the long-term.

Clearly, the Idaho Roadless Rule is not equivalent to recommended wilderness and permissible activities can affect wildlife connectivity through changes in cover and allowing motorized and mechanized transport into areas that were previously free of the displacement those activities can cause due to noise and associated human presence.

In the face of all these activities that can disrupt connectivity for numerous species, the revised plan does nothing to direct those activities in a way to conserve or restore wildlife connectivity. Thus, reliance on Idaho Roadless Rule designation for many habitats essential to grizzly, wolverine or other wide ranging species conservation cannot rationally be relied upon to provide for connectivity for these species. Consequently, the meager standards and guidelines of the 2023 NPCNF Forest Plan do not meet the requirements of the NFMA that the plan should "provide for the diversity of plant and animal communities..." 16 USC §1604(g)(3)(B) nor do they satisfy the ecological integrity requirements of the 2012 Planning Rule §219.8 and §219.9.

Connection to Prior Comments

In our comments on the Draft Plan submitted to USFS on April 20, 2020 (p. 13), the Sierra Club raised substantial concerns about the lack of connectivity protections in the Draft Plan:

“Therefore, objectives and desired future conditions may be plan components related to connectivity but they do not satisfy the 2012 Planning Rule requirement for standards or guidelines conserving connectivity. As a result, clear standards and guidelines that provide definite guidance to subsequent projects and permits on the NPCNF are required as part of the final forest plan. The Draft Plan only includes a single goal in regard to connectivity and a single mature forest guideline. This is insufficient for a plan required to address a variety of threatened, proposed and conservation concern species.”

Remedy

The Forest Service should add specific plan standards and guidelines to address connectivity more broadly such as:

- Road Density Standards
- Re-entry timelines (10 years in secure habitat for grizzlies as determined by the Grizzly Bear section of the Biological Assessment (see BA p. 249, Fig. 41)
- Cover standards for timber harvest/fuels management
- Excluding all motorized use for all in Hoodoo, Bighorn Weitas, Weir-Post-Office Creek, Pot Mountain, Lochsa Face, and Sneakfoot Meadows
- Excluding mechanized use from all of Hoodoo Roadless Area
- Food storage orders in place forest-wide

Objection 2. USFS’s conclusions regarding connectivity for grizzly bears are arbitrary and capricious and fail to address the best available scientific information, and the Revised Forest Plan does not meet the requirements of the ESA or NFMA with respect to grizzly bear secure habitat/connectivity habitat.

Sierra Club affirmatively stated the obligation of the NPCNF to manage for grizzly bear recovery in our April 20, 2020 comments on the draft plan (p.13):

[I]n the case of Endangered Species Act listed species such as lynx, grizzly or bull trout, Section 7 of the ESA imposes a duty to conserve those listed species and to act to achieve survival and recovery of the species (*Sierra Club v. Glickman*, 156 F3d 606 (5th Cir 1998)). Connectivity is an essential element of both survival and recovery of ESA listed species and specific, appropriate standards or guidelines that are clear and affirmative boundaries that guide subsequent project development are needed to achieve the duty imposed by Section 7 of the ESA.

Moreover, the NPCNF has acknowledged this duty and the importance of the NPCNF to grizzly bear recovery in several of the plan revision documents. In its Forest Plan Revision BA the Forest Service stated:

The Bitterroot Recovery Zone has been identified as one possible path for genetic interchange from the Selkirk, Cabinet Yaak, and Northern Continental Divide Ecosystem (NCDE) into the Greater Yellowstone Ecosystem. Therefore, the Nez Perce-Clearwater has the distinctive role and contribution of providing ecological conditions for grizzly bears to recolonize the Bitterroot Recovery Zone and maintain the ecological conditions to allow for migration, dispersal, and genetic interchange between grizzly bear recovery zones. BA p 214-215

Also, the BA acknowledged:

The grizzly bear recovery plan anticipated that grizzly bears can and will exist outside the boundaries of the recovery zones. The Recovery Plan (1993) recognizes that grizzly bears occasionally will move and even reside permanently in areas outside of recovery zones. It states that: *“Bears can and are expected to exist outside recovery zones lines in many areas. However, only the area within the recovery zone will be managed primarily for grizzly bear habitat.”*

However, the recovery plan also acknowledged that linkage would be necessary for isolated populations to increase and sustain themselves at recovery levels. The recovery plan (U.S. Department of the Interior 1993) stated that one factor that may affect the sustainability of grizzly bear populations in the future is the ability of individual animals to move between ecosystems. Accurate information is necessary to assess the potential for this type of movement in linkage zones between existing adjacent grizzly bear recovery zones (U.S. Department of the Interior 1993). **Future land management activities within these areas may be critical to maintaining their utility as linkage zones** (U.S. Department of the Interior 1993). Thus, outside the recovery zones, the emphasis is on linkage zones. Linkage zones are areas between currently separated populations that provide adequate habitat for low densities of individuals to exist and move between two or more larger areas of suitable habitat (U.S. Department of the Interior 2021c). BA p.222 (emphasis added)

The NPCNF BA that accompanies the plan revision identifies areas of secure grizzly habitat in Figure 39 on page 244 and then also identifies areas for grizzly bear connectivity in Figure 41 on page 244. Of particular note are the areas in the Clearwater portion of the forest, north of the Selway-Bitterroot Wilderness. These areas have varying designations under the NPCNF Plan, from recommended wilderness, to Idaho Roadless Rule lands, to Management Area 3 (essentially full multiple-use lands).

The value and importance of those lands north of the Selway-Bitterroot Wilderness for secure habitat that could allow female grizzly occupation necessary to colonize the Bitterroot Recovery Area or as permeable landscape to allow both male and female grizzlies to move to the Bitterroot Recovery Area is clear and acknowledged by the BA

The most important predictors of survival in the best survival models were the amount of secure habitat within a bear’s home range and road densities outside of secure habitat (Schwartz et al. 2010a). They concluded that managing the landscape to reduce hazards to grizzly bears requires balancing road density standards with the amount of secure habitat available (Schwartz et al. 2010a). Multiple studies concluded generally that areas with a higher percentage of secure habitat showed greater selection for and survival of female grizzly bears (Mace et al. 1996, Wakkinen and Kasworm 1997, Gibeau et al. 2001). The amount of secure habitat metric more adequately represents the potential effects related to motorized access as it provides a more accurate indication of the spatial mix of motorized routes and secure habitat (Proctor et al. 2019). BA p. 226

....

The Grizzly Bear Species Status Assessment (U.S. Department of the Interior 2021c) suggested it is important to consider the potential impact from winter recreation because grizzly bears are easily awakened in their dens. It also suggested that disturbance of grizzly bears in the den can result in cub abandonment or early den exit, which could kill a grizzly. BA p. 227

....

[A]reas outside recovery zones can play a significant role in supporting movement of bears between Recovery Zones. Successful dispersal of bears is important to enable recolonization of vacant habitat (i.e., improving redundancy/ security against stochastic events across the range); bolster small populations, such as in the Cabinet-Yaak Ecosystem; and provide genetic connectivity between the other ecosystems and the isolated population in the Greater Yellowstone Ecosystem. BA p. 228

Likewise, the BA acknowledges the importance of some areas of multiple use management under the 2023 Forest Plan:

Some areas of multiple use management may be important for connectivity because of their location. Some are located where grizzly bears have a higher likelihood of encountering on their way into the Bitterroot Recovery Zone. Specific examples include the checkerboard ownership areas near Lolo Pass, and two areas of Management Area 3 in the Kelly Creek Area in the North Fork Clearwater Area (figure 41). Dispersing bears entering the forest from the North or East could encounter these areas. These areas have existing conditions that could potentially lead to human-bear conflicts because of higher road density and more human uses. Bear 927 used the checkerboard area near Lolo pass (i.e., mixed private and Forest Service landownership in a checkerboard pattern) and passed through the secure habitat between the multiple use areas near Kelly Creek. BA p. 249

Indeed, all confirmed grizzly locations in the NPCNF to date occurred on the northern portion of the Clearwater Forest (BA p.218-220, Figure 36).

Despite all of this information pointing to the importance of the lands in the Clearwater portion of the forest, the BA explains that land use designations will be adequate to protect connectivity values and secure habitat:

Demographic connectivity areas were considered during the development of the final environmental impact statement. Demographic connectivity areas are not needed at this time because of the existing regulations that occur as a natural result of roadless rule regulations and wilderness laws, which already provide this connectivity. BA p. 261

This contradicts the statement that multiple-use lands (Management Area 3) were in areas where grizzly bear movement has already occurred and can occur in the future quoted above. It also fails to recognize the lack of protections from motorized use under the Idaho Roadless Rule, outlined in our Objection 1 above. It also does not account for the 2021 Grizzly Bear Species Status Assessment finding that there are potential impacts from winter motorized use that need to be considered cited above. The possibility of temporary roads or road reconstruction in BCR Idaho

Roadless Areas is not considered. Nor is the potential for changes to cover from fuels management allowed under the Idaho Roadless Rule in BCR areas considered.

The Forest Service’s rationale for failing to provide for demographic connectivity areas in the revised plan is thus arbitrary and capricious, and reflects a failure to address the best available scientific information presented in the 2021 Grizzly Bear Species Status Assessment regarding potential impacts from winter motorized use.¹ As detailed above, despite roadless rule regulations and wilderness protections, significant areas remain without adequate protections from activities that would disrupt connectivity for grizzly bears, and the revised plan has failed to provide the additional protections needed to ensure connectivity. The Forest Service’s arbitrary and capricious rationale for failing to provide for demographic connectivity areas also constitutes a failure to comply with the requirements of the NFMA that the plan should “provide for the diversity of plant and animal communities,” 16 USC §1604(g)(3)(B), and a failure to satisfy the requirements of the 2012 Planning Rule at §219.8 and §219.9.

Furthermore, the land designations in the 2023 NPCNF Forest Plan do not satisfy USFS’s obligation to contribute to the recovery of grizzly bears as required by Section 7 of the Endangered Species Act. USFS must take affirmative steps to allow grizzlies to move through and live on lands between congressionally designated wilderness areas that are the core of all grizzly bear ecosystems. The 1993 Grizzly Bear Recovery Plan designates the Bitterroot Recovery Area. In order for that area to be inhabited by a breeding population of grizzlies it must provide strong protections for secure habitat outside the recovery area. This is especially true now that the US Fish and Wildlife Service is reinitiating a process to facilitate grizzlies in the Bitterroot Ecosystem (see: [https://www.fws.gov/press-release/2024-01/usfws-initiates-process-evaluate-restoration-grizzly-bears-bitterroot#:~:text=Although%20individual%20grizzly%20bears%20have,species%20in%20the%20contiguous%20U.S. \)](https://www.fws.gov/press-release/2024-01/usfws-initiates-process-evaluate-restoration-grizzly-bears-bitterroot#:~:text=Although%20individual%20grizzly%20bears%20have,species%20in%20the%20contiguous%20U.S.)

Connection to Prior Comments

As noted in several places above, the Sierra Club commented on, advocated for, and provided extensive rationale for enacting real protections for grizzly bear secure habitat, lands with associated high connectivity or linkage values in our April 20, 2020 comments on the Draft Plan:

“The NPCNF has a unique and important responsibility to recover grizzly bears and to ensure that both male and female grizzly bears recolonize the Bitterroot Recovery Zone. We

¹ Judicial review of agency actions is governed by the Administrative Procedure Act. [5 U.S.C. §§ 706, et seq.](#); see *San Luis & Delta-Mendota Water Auth. v. Jewell*, 747 F.3d 581, 601 (9th Cir. 2014). Under the Administrative Procedure Act, the “reviewing court shall ... hold unlawful and set aside agency action, findings, and conclusions found to be ... arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” [5 U.S.C. § 706\(2\)\(A\)](#).

A decision is arbitrary and capricious “if the agency has relied on factors Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” [Motor Vehicle Mfrs. Ass’n of the U.S., Inc. v. State Farm Mut. Auto. Ins. Co.](#), 463 U.S. 29, 43 (1983). USFS must use “the best available scientific information to inform the planning process.” 36 C.F.R. § 219.3.

are very concerned that the Forest Service's approach to grizzly bear recovery on the Forest is not pro-active. The final plan must be robust and provide strong desired conditions, guidelines and standards to protect grizzly bears and their habitat." (p. 18-19)

"The Forest Service does seem to acknowledge that a somewhat more pro-active approach should be considered in regard to connectivity, noting that "[...because grizzly bears must disperse naturally into the Bitterroot Recovery Zone in order to become established, the way the plan provides for connectivity for grizzly bears is a key consideration for how the revised plan will contribute to the recovery of the grizzly bear." (DEIS, page 3.2.3.3-81) However, as noted above, no specific plan components were included in the Draft Plan to foster grizzly bear recovery or connectivity, and the Draft Plan does not include specific standards and guidelines related to connectivity." (p. 19)

These are examples of the issues raised about the inadequacy of the plan in our April 20, 2020 comments on pages 18-21. Sierra Club has advocated for stronger provisions necessary to meet the mandate of the ESA Section 7 that all federal agencies contribute to recovery of listed species.

Remedy

The Forest Service should recommend the following roadless areas for wilderness designation with boundaries as outlined in our comments on the Draft Plan that include Alternative Z recommended wilderness designations plus all of Hoodoo, Bighorn Weitas, Weir-Post-Office Creek, Pot Mountain, Lochsa Face, North Fork Spruce-Whitesands and Sneakfoot Meadows.

Additionally, standards should be included in the NPCNF final plan to:

- Implement a Forest-wide food storage order and install bearproof dumpsters at campgrounds and work centers.
- Establish grizzly bear relocation sites and Bear Management Units on the NPCNF within one year of finalization of the forest plan.
- Designate total and open motorized road densities and secure habitat percentages in BMUs to allow establishment of grizzly bears, especially breeding age females below 1 km/km².
- Prohibit oversnow use in core habitat from March 15-June 15.
- Avoid disturbance in areas of predicted or actual denning habitat during spring emergence (March 15-May 1)
- Prohibit re-entry for vegetation management within 10 years in identified grizzly bear potential habitat or connectivity areas
- Manage Recommended wilderness in suitable grizzly bear habitat to provide maximum reduction of human-grizzly bear conflict
- Prohibit hunting of grizzly bears on NPCNF (if bears are delisted) lands and implement a National Forest penalty for mistaken identity shooting of a grizzly bear during black bear hunting season

All of the Hoodoo Roadless Area should be recommended for wilderness (RW) as outlined in our previous comments:

If these roadless areas ultimately are not recommended, at a minimum, in addition to existing plan components restricting various activities in BCAs such as permanent or temporary road building, all secure grizzly connectivity habitat should prohibit special use recreation events (daytime and evening), timber harvest, and development of any new roads or trails (motorized or mechanized) in order to protect their wild character and wildlife.

Conclusion

As outlined above, the Sierra Club has remaining substantive concerns with the final 2023 Forest Plan and DROD. We look forward to discussing these issues further and hope that our concerns will be adequately resolved through an objection meeting.

Sincerely,



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