



VIA Link: <https://www.fs.usda.gov/project/?project=67523>

October 13, 2025

Beaverhead-Deerlodge National Forest
Attn: Objection Reviewing Officer
420 Barrett Street
Dillon, MT 59725

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Beaverhead-Deerlodge National Forest Plan Amendment for Canada Lynx Habitat (Amendment) which is currently in the Objection Period.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Beaverhead-Deerlodge National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

For background, when the 2009 Beaverhead-Deerlodge Forest Plan was implemented, the Forest was considered unoccupied by Canada lynx (*lynx*) and the Forest incorporated the Northern Rockies Lynx Management Direction (NRLMD). As an unoccupied Forest, components of the Forest Plan including goals, objectives, standards, and guidelines were considered in project planning for the lynx, but the Plan did not provide mandatory management direction.

Due to the detection of a number of lynx on the Forest during 2017-19, on September 15, 2020, the Interagency Western Lynx Biology team concluded the Forest met provisions for changing the Plan area status from unoccupied to occupied thus triggering the adaptive management approach laid out by the NRLMD for lynx management. In response to the change from unoccupied to occupied, the Forest worked with the Region to update the lynx habitat maps and

delineation of Lynx Analysis Unit boundaries using improved habitat mapping in accordance with NRLMD standards.

AFRC is not writing to object to this Amendment, rather we are submitting this letter to encourage the Forest to move to adopt the new Forest Plan Amendment for Canada Lynx. AFRC staff and members are very familiar with Beaverhead-Deerlodge National Forest and the current forest conditions. AFRC submitted scoping comments on the Amendment on March 24, 2024, and Draft EA comments on June 28, 2025 where we supported Alternative 2 as presented.

Why is AFRC Supporting the Amendment?

1. AFRC supports the Forest's identification of the Purpose and Need for this Forest Plan Amendment which includes:

- There is a need to update where Forest Plan Wildlife Standard 7, more commonly known as the Northern Rockies Lynx Management Direction (NRLMD), applies on National Forest System Lands managed by the Beaverhead-Deerlodge National Forest.
- The purpose of the proposed amendment is to identify lands on the Forest that meet the criteria for Canada lynx habitat and to delineate where the Forest Plan standards will apply result in the best possible outcomes for lynx conservation.
- There is a need to update the Forest Plan to reflect where new information has improved the identification of Canada lynx habitat.
- With the change in occupied status, there is a need to identify where NRLMD standards and guidelines apply.
- There is a need to respond to public comments regarding their desire to be involved in Canada lynx habitat mapping through NEPA.

2. AFRC strongly supports Alternative 2 of this proposed Forest Plan Amendment.

In 2019, when the BDNF anticipated a change in lynx occupancy status, the Forest started building a new model to fully incorporate direction from the Lynx Conservation Assessment and Strategy, the NRLMD Final Environmental Impact Statement and its Biological Opinion, and research on snow as a lynx habitat component. This is Alternative 2, the proposed action. Alternative 2 would apply lynx habitat management direction described in the Forest Plan approximately 1,481,876 acres of mapped lynx habitat on National Forest System lands in 77 LAUs.

3. The data in Alternative 1 is outdated.

The Alternative 1 basic query for identification of lynx habitat included reliance on Satellite Imagery Land Classification (SILC), a data set from the late 1990s which is a snapshot of existing vegetative conditions that existed over 25 years ago. The Alternative 1 lynx habitat identification method over-mapped lynx habitat. The Alternative 2 basic query for identification of lynx habitat relied on potential vegetation type, which was modeled around 2004, and field surveyed potential vegetation type where available. Potential vegetation type is a better indicator of a forested stand's ability to provide lynx habitat rather than existing vegetation because it is based on the habitat type of a site.

4. **The USFWS recognized that lynx and snowshoe hares are snow-adapted species and that ecological requirements include both boreal forest and snow conditions.**

An abundance of published literature supports the fact that lynx need snowy environments in the winter in their home range. Alternative 1 did not include any consideration of location of winter snow in its habitat model, which is another factor that contributed to the over-mapping of lynx habitat. Alternative 2 appropriately included snow as a part of the habitat mapping process.

The habitat model in Alternative 1 over-mapped lynx habitat, including acres with vegetation characteristics that lynx would not use (e.g. dry forest types, grasslands, sagebrush, etc.). Alternative 2 applied all the pertinent direction from the Lynx Conservation Assessment Strategy, Interagency Lynx Biology Team (2013) and the NRLMD to delineate 77 LAUs that range in size from 17,188 to 94,618 acres (all ownerships).

5. **Modification of lynx analysis unit boundaries under Alternative 2 provides better protection for the lynx.**

- a. Alternative 2 more accurately identifies lynx habitat than Alternative 1. Therefore, the objectives, and standards and guidelines that apply to lynx habitat in lynx analysis units under Alternative 2 for vegetation management would result in better habitat protections for the lynx.
- b. Alternative 2 LAUs exclude areas of the Beaverhead-Deerlodge National Forest that lack adequate winter snow, which results in less area designated in an LAU when compared to Alternative 1. This proposed correction to previous over-mapping would result in positive outcomes for lynx conservation.
- c. Alternative 2 incorporated all lynx habitat criteria resulting in more accurately identified lynx habitat than Alternative 1. Numerous Canada lynx research publications clearly show that winter snow condition is an important habitat identifier.

6. **Olson et al. (2021) applied their lynx habitat model to areas that lacked lynx location data and identified areas of relative habitat probability on the BDNF.** This habitat probability map provides complete coverage for the landscapes and areas across the BDNF, assigning areas as either high, middle or low habitat probability. The Olson model closely aligns with the LAU boundaries identified in Alternative 2 compared to Alternative 1. Alternative 2 LAU boundaries are an excellent fit for the high and middle lynx habitat probability as modeled by Olson et. **Alternative 1 LAUs include many areas of low lynx habitat probability. Many Alternative 1 LAUs do not contain the minimum amount of lynx habitat to support a female on a home range, and designating this habitat is an unnecessarily conservative approach that would not result in net benefits for the lynx.**

7. **AFRC supports the discussion on cumulative effects.**

Vegetation management of lands across other ownerships within LAU boundaries could reduce lynx foraging habitat. This amendment would result in a clarification of where the NRLMD would apply on National Forest System lands managed by the BDNF but would not influence the number of acres harvested or precommercially thinned on lands of other ownership.

Because this amendment is not expected to result in an increase in the amount of vegetation management on the BDNF, no negative cumulative effects beyond what were disclosed in the 2021 Biological Assessment for the Ongoing Effects of the 2009 Forest Plan on Canada lynx (USFS 2021) are expected.

8. Fire is the real threat to Canada lynx.

The BDNF has witnessed hundreds of thousands of acres of wildfire burn across the Forest in the last few years, destroying many resources including lynx habitat. This is the result of decades of dead and dying lodgepole pine occurring across the Forest as well as the lack of thinning treatments in stands of Douglas-fir and other conifers. Managing the Forest is the only way to maintain lynx habitat and establish young stands of lodgepole pine that provide forage for the snowshoe hare which is the main prey for the lynx.

9. AFRC supports the conclusions supporting Alternative 2 which would benefit the Canada lynx in the long run.

- a. Alternative 2 results in better conservation outcomes for lynx because it more accurately identifies lynx habitat.
- b. Alternative 2 addresses the best available scientific information about lynx habitat by using potential vegetation type to identify lynx habitat and by incorporating snow conditions in the habitat identification process. Alternative 2 LAUs closely fits the Olson et al. (2021) model which models middle and high probability lynx habitat.

For the reasons listed above, AFRC strongly encourages the Forest to implement this Forest Plan Amendment (Alternative 2) which would provide the needed lynx management direction and guidance to allow for current projects being planned on the Forest to move forward.

AFRC supports using a Programmatic Amendment to amend the Canada lynx habitat in the Forest Plan which would not result in direct on-the-ground changes but would apply to all future projects implemented under the Forest Plan. Site specific effects to Canada lynx habitat and other resources would occur during project level analyses when specific management activities are proposed.

Thank you for taking our letter of support for the proposed Beaverhead-Deerlodge National Forest Plan Amendment for Canada Lynx Habitat. We look forward to the implementation of Alternative 2.

Sincerely,



Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239