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December 8, 2025

Madison Ranger District

Attn: Josh Connors

5 Forest Service Road

Ennis, MT 59729

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE GREENHORNE VEGETATION PROJECT.

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, and the Council on Wildlife and Fish would like to submit the following comments on the draft Environmental Assessment (EA) for the Greenhorn Vegetation Project. Please note that these comments include 2 attachments. Attachment #1 includes a hard copy of the Objection filed by NEC et al. on October 14, 2025 against the BDNF Canada Lynx Forest Plan Amendment. Attachment #2 includes hard copies of a number of additional references that were not provided previously in regards of public involvement opportunities for the first Greenhorn Vegetation Project which was subsequently withdrawn. In order to avoid repetition, NEC et al. is incorporating "by reference" all the previous public involvement activities that commenters have previously provided for the Greenhorn Vegetation Project, including the scoping comments provided on 10/18/17, the 30-day draft EA comments provided on 4/14/22, and the Objection provided on 8/8/22. We would like to incorporate by reference all of the documents provided in appendices of these public comments as well.

A. Additional issues brought forward or expanded in these comments

1. The agency is violating the Forest Plan direction for sage grouse.

The Forest Plan standard 8 requiring no removal of sagebrush habitat within 300 meters of riparian zones and meadows will be violated. The EA does not map these area nor identifies they will be protected from burning, which includes all slash/burn units except E5, which is only slashing.

The agency falsely claims that the project area does not contain any sage grouse nesting habitat because it is over 6.2 miles from any leks. The MOU between the BDNF and the MFWP (USDA/MFWP 1998) noted that sage grouse will nest up to 23 miles from leks. By claiming the project area does not contain any sage grouse nesting habitat, that agency has failed to demonstrate that the Forest Plan amendment for sage grouse (2015) that 80% nesting habitat will contain sagebrush cover of 15-25% canopy cover and perennial grass residual height of 7 inches. Also, nesting habitat that is burned in the spring during the nesting season is a violation of this Forest Plan direction. The agency claims that no sage grouse nest in sagebrush habitats of the project area is clearly an attempt to conceal burning sagebrush during the sage grouse nesting season.

GRSG-GEN-ST-004 standard is not demonstrated to be in compliance for this project. This standard requires the agency to provide a disturbance calculation including within general sage grouse habitat.

The agency has failed to provide a map of all sage grouse leks within 18 km and 23 miles of the project area.

The agency has failed to demonstrate what current or projected sagebrush conditions will be in brood-rearing habitat planned for sagebrush burning. The Forest Plan amendment (2015) requires brood-rearing habitat to have over 40% sagebrush habitat of 10-25% canopy cover and a sagebrush height of 16-22 inches.

As previously noted, GRSG-GEN-GL-007 will be violated as potential sage grouse nesting habitat will be burned during the nesting season.

GRSG-GRSGH-ST-027 standard will be violated as the proposed sagebrush burning activities has not been demonstrated to move the project towards desired conditions; desired conditions are never identified, as well as what needs to be changed to achieve desired conditions with sagebrush removal and fragmentation. Desired conditions for brood-rearing habitat are defined in the sage grouse 2015 amendment, but not identified by the agency for the Greehorn Vegetation project.

GRSG-GRSGH-GLL-030-Guideline will be violated as the agency has failed to define specifically where cheatgrass infestations currently occur in proposed sagebrush burning units, and why these populations will not expand with burning; if control is possible to prevent expansion, why haven't these cheatgrass populations already been removed?

GRSG-GRSGH-GL-032-guideline notes that vegetation treatment projects should only be implemented if they maintain, restore or enhance desired conditions; how this burning will affect desired conditions is never identified.

The agency notes at page 40 in the wildlife report that prescribed fire is needed to attain desired conditions, but these desired conditions are never identified.

Forest Plan GRSG-GEN-ST-043 will be violated by this project. This standard requires the agency that in general habitat, if it is necessary to burn sagebrush, the agency has to demonstrate how this will move the project to desired conditions, and why alternative methods were not selected. An alternative method that could be selected is as is planned in Unit E5, where no sagebrush would be burned while trees are reduced. Desired conditions are never identified or how these will be achieved with burning sagebrush. Specifically, the agency did not define why only slashing of conifers, without burning sagebrush, is planned on vast acres of sage grouse habitat. Only one unit, E5, does not burn sagebrush in sage grouse habitat.

2. The agency is violating the NEPA by claiming that burning sagebrush, while retaining patches (burn in a mosaic) promotes sage grouse viability.

The agency did not cite any science that reported sage grouse populations increased when sagebrush habitat was burned in a "mosaic." This habitat objective has no actual meaning, which is also a violation of the NEPA. A mosaic could retain any amount of sagebrush (5% to 95%) and still qualify as habitat improvement for sage grouse. The current best science has clearly identified that burning sagebrush is highly detrimental to sage grouse viability. The best predictor of sage grouse persistence is the percentage "tall sagebrush" and the size of sagebrush patches on the landscape (Johnson et al. 2011; Wisdom et al. 2011). Burning reduces the amount of tall sagebrush on the landscape, while it also reduces the patch size of tall sagebrush, both noted to be negative effects on sage grouse, not habitat improvement.

3. The agency is violating the NEPA and the NFMA by claiming that acres of sagebrush burning provides a population proxy for sage grouse; no population monitoring is being done to verify burning sagebrush improves sage grouse habitat.

The latest Forest Plan monitoring report for the BDNF (2021) has no population information on sage grouse. Instead, the acres of sagebrush burning is used as a measure of "habitat restoration" and thus population benefits for sage grouse. This population benefit is also noted repeatedly in the Greenhorn Vegetation project analysis of burning sagebrush effects on sage grouse. The agency is violating the NFMA because they are not actually monitoring the impact of sagebrush burning on sage grouse, which is a sensitive species on this forest. This violation also triggers a violation for the Greenhorn Vegetation Project, because the agency is claiming population benefits to sage grouse which have never been substantiated with any Forest Plan monitoring even though sagebrush burning is a common practice on this Forest. AS was noted in the Greenhorn Vegetation project 2nd EA, there have been 54,314 acres of conifer/sagebrush treatments in the last 9 years in Madison and Beaverhead counties, supposedly to benefit sage grouse. This huge impact on sagebrush burning remains unmeasured by the BDNF, in violation of both the NEPA and the NFMA. There is to date no assessment by the agency to show that this massive burning of sagebrush has resulted in population increases of sage grouse, as is claimed in the Greenhorn Vegetation project.

4. The Greenhorn Vegetation project is a violation of the NEPA because the agency has not evaluated the cumulative effects of sagebrush burning on sage grouse.

As was noted above, the 2nd Greenhorn Vegetation project EA at page 29 notes that through 2016-2024, there have been 54,324 acres of sagebrush removal in Madison and Beaverhead counties to benefit sage grouse. Additional BLM sagebrush burning is also noted to be planned on 1800 acres next to or close to the Greenhorn Vegetation project. These sagebrush burning projects are claimed to be "habitat restoration" for sage grouse, but this has never been demonstrated with any monitoring of sage grouse populations. Has this massive burning program resulted in sage grouse population increases? It does not appear to be the case, as the agency blames "ongoing declines" on bad weather in the 2nd EA at page 29.The agency needs to provide the long-term trend of sage grouse leks in

the vicinity of all these sagebrush burning projects in order to make any claims of sage grouse benefits from these project. Claims that burning sagebrush in the Greenhorn project have yet to be substantiated with any Forest Plan monitoring, making these claims a violation of the NEPA and the NFMA.

5. The agency has failed to address the ecological impacts of the ongoing loss of sagebrush habitat.

Koshmrl (2024) report notes that sagebrush-dominated landscapes continue to decline; a cited study showed that 1.3 million acres of sagebrush are being lost or degraded every year.

6. The agency is violating the Forest Plan direction for snag management.

The Forest Plan requires that snag inventories be completed at least within proposed units where mechanical treatment is planned. This would include all of the proposed treatment units that involve cutting/masticating trees, which totals 5,463 acres of the project area. If the snag standard is not being met in the proposed mechanical treatment units, then the standard can be met if the snag standard across the project area can be met. There is no snag inventory for any of the proposed mechanical treatment units, nor is there a snag inventory for the forested vegetation types within the 41,900 acre project area. As such, the agency cannot demonstrate they are meeting the Forest Plan snag standard.

Snag abundance is important for a sensitive bat species. The Little Brown Myotis is noted to use snags for roosting, and possibly maternity roosts. The impact of the Greenhorn Vegetation project on this species as per snag habitat was not addressed.

7. The agency is violating the NEPA by failing to address what is likely a significant increase in cheatgrass in the Greenhorn project area due to the widespread burning and soil disturbance being planned; the agency has not defined what represents a significant increase in cheatgrass either locally or landscape-wide, and why this level of increase will be avoided.

The current cheatgrass infestations in the Greenhorn project area are not quantified nor mapped. The level of this problem thus is unknown. This lack of information means the public is unable to understand if this project could trigger significant ecological impacts by huge increases in cheatgrass. Although the 2nd Greenhorn EA "suggests" that the agency is trying to control cheatgrass, it is unknown how successful these efforts have been in the Greenhorn project area. If significant cheatgrass populations occur across this project area, then there is no evidence that the agency is able to control and eradicate cheatgrass. This failure to be able to eradicate cheatgrass is a severe ecological problem, not only for fire control, since cheatgrass if highly flammable, but to wildlife. For example, cheatgrass will increase the potential for sagebrush to burn (Koshmrl 2025). And as was noted by Koshmlr (2025) cheatgrass is the most existential, sweeping threat to western ecosystems. This report noted that the adaptability and just kind of sheer ability of cheatgrass to get a toehold and take over is pretty remarkable. This report also notes that the pace of cheatgrass infestation across Wyoming far exceeds the total resources available to address these infestations. There is some indication that new herbicides may help control cheatgrass (Indaziflam), which can be spayed without killing sagebrush. This treatment costs $42-43 per acre. This report also noted that even without competing with cheatgrass, sagebrush comes back "painstakingly slow;" individual plants can take decades to mature; Wyoming big sagebrush takes as long as 200-350 years to return to dense stands of mature plant. The Greenhorn Vegetation project includes mostly mountain big sagebrush, which is slightly better at recovering from fire.

The Greenhorn Vegetation project dismisses any ecological concerns for cheatgrass. The ongoing expansion of cheatgrass across western states is never

even addressed. As noted in a recent High Country News article (2024), currently there are 31.3 million acres of western rangelands infested with cheatgrass. And Native Ecosystems Council has provided the BDNF reports of cheatgrass infestations on this forest triggered by prescribed burning (Johnson undated; Johnson 2005). These letters or reports included photos of cheatgrass infestations triggered by prescribed burning in the Meadow Creek area of the Madison Ranger District, and in the Tobacco Roots landscape, also of the Madison Ranger District.

The Forest Service clearly dismisses the ecological problem of converting native shrublands and grasslands to cheatgrass in the Greenhorn Vegetation project draft EA. This same dismissive attitude is different from what the Helena-Lewis and Clark National Forest recently reported as per cheatgrass infestations. USDA (2018) for the Castle Mountains noted many problems with fire and cheatgrass: prescribed fire can result in physical and biological changes to soil that make them more susceptible to weed invasions, or can create favorable conditions for weed expansion if invasive plants are already present in the treatment area (page 297); research as demonstrated that certain invasive plants, such as knapweed, houndstongue and cheatgrass, could readily invade intact native plant communities because of their aggressive nature; these invasive plants are considered to be "strong" invaders and have been documented to invade plant communities that were considered to be healthy, divers and species-rich (page 298); without treatment, invasive species such as cheatgrass would likely continue to expand in size and density without treatment where site conditions are favorable (page 298); potential indirect effects of proposed project actions would consist primarily of the subsequent invasion, or expansion of existing weed infestations following ground disturbing activities (page 299); consistent and thorough treatment over a period of about 10 years may be needed to eradicate a smaller population, but larger infestations would likely continue to expand is size; this could result in long-lasting ecological effects to native plant communities; some invasive plants as cheatgrass can become a permanent and widespread feature on the landscape (page 300); design features for project activities are still likely to result in expansion of weed infestations in some treatment units even when preventative measures are implemented (page 301); the potential long-term effect of invasive plants is more difficult to quantify on a

timescale; if left untreated, or control actions are unsuccessful, new invasive plant populations can expand at a rapid rate under favorable site conditions; once an infestation has grown beyond about 0.1 acres, successful control or eradication becomes more problematic and time-consuming; consistent and thorough treatment over a period of about 10 years may be needed to eradicate a smaller population, but larger infestations would likely continue to expand in size; this could result in long-lasting ecological effects to native plant communities; some invasive plants such as cheatgrass can become a permanent and widespread feature on the landscape (page 302 and page 316).

The BLM also has acknowledged the difficulties in preventing and controlling cheatgrass populations in the Madison watershed. USDI (2019) noted that on the Shirley grazing allotment, following a small fire, large populations of leafy spurge, knapweed and cheatgrass moved into the disturbed areas; the 2009 watershed assessment report stated that "in spite of years of expensive weed treatments, noxious weeds have continued to spread across both private and BLM administered lands in the area." This entire allotment burned in the 2012 Bear Trap Fire, which resulted in an increase in abundance of cheatgrass and a decrease in abundance of shrub species; in addition, cheatgrass, spotted knapweed, leafy spurge, and musk thistle were all common throughout the allotment; as expected following a fire, there was a dramatic shift in the plant community from 2010 to 2018; CMBG species declined from 21% to 7% of the foliar cover, along with a loss of prairie June grass and Idaho fescue; during this period, cheatgrass increased from about 14% foliar cover to 37% foliar cover; upland health was rated as FAR with a downward trend primarily to noxious and invasive species.

8. The Greenhorn Vegetation project did not address how the inevitable increases in cheatgrass on all treatment acres (over 15,000 acres) will affect wildlife.

There was no analysis in the Greenhorn Vegetation project draft EA as to how inevitable increases in cheatgrass will affect elk, and thus mule deer, a species

that is supposedly "indicated" by elk. The perpetual increase in cheatgrass in this project area will reduce mule deer habitat, and the level of this habitat loss is never addressed. Degradation of local habitat conditions by increases in cheatgrass will affect mule deer much more than elk, as mule deer use much smaller portions of a given landscape. The impact of cheatgrass infestations on mule deer has been identified, but not addressed in the Greenhorn Vegetation NEPA documents. Peterson (2025) reported that cheatgrass infestations in Wyoming are resulting in avoidance of these areas by mule deer. For example, dried out cheatgrass plants in the summer are not consumed by mule deer. This report noted that once cheatgrass constitutes about 20% of the area, it is almost completely avoided by mule deer; when it constitutes about 10-16% of an area, mule deer will begin to avoid an area; anything above 20% is utterly unappealing. This study also noted that cheatgrass continues to spread in northeast Wyoming; if this expansion continues, up to 50% of good mule deer habitat may be rendered useless to them. This report noted that cheatgrass if one of a number of contributing factors to the ongoing decline of mule deer. This study also noted that cheatgrass has been the scourge of western landscape for well over a century; once cured out, it loses any nutritional value, and also becomes a fire hazard.

9. The agency did not provide how design features for the Greenhorn Vegetation project were implemented for the prescribed fire unit that was already burned, in violation of the NEPA.

The agency notes that for design features of project treatments, post-activity monitoring will be done for, and treatment of, invasive plants on all proposed treatment units; specific emphasis will be given to units with existing infestations. The existing infestation level of cheatgrass in the unit that was already burned was not provided in the draft EA, in order to demonstrate that the agency adhered to the required design features. Nor was any information provided as to what type of post-treatment monitoring was done in this unit. If these design features are not actually implemented, then the agency is violating the NEPA by claiming these mitigation measures will be applied.

Also, the Greenhorn Vegetation draft EA did not disclose if pre-implementation surveys were conducted for great grey owls, flammulated owls, and goshawks in the unit that was already burned; the actual activity in this unit is unknown, including treatment design. It is unknown is suitable habitat for owls and goshawks is present. If surveys were not conducted, then the design features claiming buffers around active nests will be provided is false. These design features also note that no burning will be done from May 1-July 30 unless flammulated owl surveys have been completed. The agency needs to provide this important information in the draft EA in order to demonstrate that design features are actually being implemented as mitigation measures for wildlife and cheatgrass control.

10. The agency is violating the NFMA by violating a Forest Plan Objective for noxious weeds, as well as failing to monitor how vegetation treatments affect cheatgrass infestations across the BDNF.

The BDNF Forest Plan has an objective for noxious weeds at page 44. This objective states that the objective is to prevent, reduce or eliminate infestations of non-native or noxious weed species with an emphasis on areas where there is a high likelihood of establishment and spread. The Forest Plan monitoring report has a Land Health and Vitality monitoring item that addresses invasive species; the monitoring question required to be addressed is "are management actions preventing or controlling new and existing infestations of weeds?" To date, the agency has not implemented this monitoring program for noxious weeds, in violation of the NFMA. The latest Forest Plan monitoring report, published in 2021, notes that noxious weed presence decreases the ecological integrity of vegetative communities; if left untreated, noxious weeds will replace native vegetation with a monoculture of invasive, non-native species leading to a decline in vegetative diversity, soil productivity, watershed stability, and desirable wildlife forage, especially on big game winter range. The 2021 monitoring report in Table 91 notes that the monitoring item, what is the change in weed infestations, is uncertain; more time is needed to address potential data discrepancies and improve reporting.

In spite of the noted threats to ecological integrity of vegetation communities that are created by noxious weeds, the BDNF has failed to implement any monitoring of the effects of vegetation treatments on cheatgrass. As was noted in the Greenhorn Vegetation Project most recent draft EA, there have been an estimated 54,314 acres of areas where conifer trees were removed in sagebrush areas. It is not stated that which, and possibly all, of these treatments includes prescribed burning as well, which would make cheatgrass infestations more likely than simply with slashing of conifers, although conifer removal along requires pile burning which promotes cheatgrass which can then spread. It seems highly likely that since these 54,314 acres of treatments in the landscape of Madison and Beaverhead Counties, that cheatgrass infestations have significantly expanded. Any further sagebrush burning and conifer removal cannot go forward, including in the Greenhorn Vegetation project, until the agency adheres to the NFMA and NEPA by actually measuring the effects of these treatments on cheatgrass and the subsequent degradation of ecosystems and wildlife habitat. Instead of continuing to expand cheatgrass populations, the agency needs to adhere to the Forest Plan objective of controlling and reducing existing infestations.

11. The agency will violate the Roadless Conservation Rule by implementing management actions (slashing trees and burning sagebrush) that will increase populations of non-native plant species, including cheatgrass which is known to degrade wildlife habitat.

Implementing management intervention actions that have a high probability of increasing the acreage of noxious weeds and invasive annuals, specifically cheatgrass, is inconsistent with the Roadless Area Rule to promote natural ecological conditions for wildlife. There is no doubt that increasing cheatgrass degrades ecological conditions for wildlife. The agency did not provide any science to demonstrate that no increases of cheatgrass have occurred in past vegetation treatment units (e.g., 54,314 acres), and thus, no such increases are expected to occur in the roadless areas to be treated in the Greenhorn Vegetation project.

12. The agency is violating the ESD requirements by violating Forest Plan direction, and as well, by increasing the risk of wildfire due to planned treatments, counter to claimed project effects in violation of the NEPA.

There is no doubt that increasing cheatgrass on the landscape increases the fire risk. So the claim that this emergency treatment of slashing and burning habitats in the Greenhorn Vegetation project area is clearly false. The agency has failed to provide any actual data to demonstrate that this proposal will not trigger substantial and likely long-term increases in cheatgrass, which in turn will increase, not decrease, fire risk on this landscape. In addition, we have noted that this project will trigger multiple Forest Plan violations, including objectives, standards and guidelines, as well as a failure to complete the required monitoring of cheatgrass populations in treatment areas. Use of an ESD requires that Forest Plan direction be followed, since the NFMA is still in effect.

13. Remapping of lynx habitat on the BDNF requires completion of an EIS as this is a significant amendment to the Forest Plan.

The Greenhorn Vegetation project is tiered to the 2020 remapping decision on the BDNF for lynx habitat.The NEPA requires federal agencies to prepare a detailed EIS for any major Federal actions significantly affecting the quality of the human environment. The 2020 remapping of lynx habitat eliminated approximately 1.1 million acres of mapped lynx habitat on the forest, and eliminated 431 individual Lynx Analysis Units (LAUs), thereby stripping the legal protections of the NRLMD from those acres. These changes in LAUs included the Greenhorn project area. This project area currently contains LAUs GR-01 and GR-03. In the prior lynx habitat mapping, these LAUs were numbered differently and there were more individual LAUs. Yet the Forest Service did not prepare an EIS for the removal of over 1.1 million acres of mapped lynx habitat and 431 LAUs on the Forest. This is a significant Forest Plan amendment, which requires on EIS. Furthermore, any substantive protections of the 2012 NFMA planning regulations that are "directly relevant" to the forest plan amendment must be applied. The

Forest Service must formally analyze a Significant Forest Plan amendment in an EIS that complies with the 2012 NFMA planning regulations before it may implement the Greenhorn Vegetation project that is tiered to the 2020 remapping process. Also, the Project's EA's application of/reliance on the 2020 remap and removal of habitat and LAUs violates NEPA because it constitutes improper tiering. There must be either a programmatic EIS or a Project EIS analysis that analyzes the direct, indirect and cumulative effects from the Forest Service's 2020 decision to remap and remove 1.1 million acres of lynx habitat and 431 LAUs. The agency's failure to do either renders the Project decision arbitrary, capricious, and in violation of NEPA and the APA.

14. The project EA provides false information on the amount of grizzly bear security habitat that will be impacted by the project; this false assessment of project impacts on grizzly bear security is used to provide similarly false conclusions regarding how the project will affect the Forest Plan direction to have at last 60% security for grizzly bears in the Gravellies.

A large percentage of current grizzly bear secure habitat exist within the roadless area lands. In turn, a large acreage of expansive prescribed burning is planned in this roadless security grizzly bear habitat. These activities are not considered to impact grizzly bear security, even though bears will be displaced across significant portions of security habitat due to long-term disturbances across burning units. Treatments and disturbances within secure habitat remove this as secure habitat, an impact that is not disclosed by the agency, in violation of the ESA and the NEPA. Treatments within secure habitat in roadless lands represents a loss of security and as such causes a significant reduction in the recommended 60% security for the Gravellies, an effect that was not identified by the agency.

15. The USFWS project biological opinion fails to use the best available science, fails to adequately address the environmental baseline, and/or direct, indirect and cumulative effects on grizzly bears, and arbitrarily and capriciously ignores the Forest Plan finding that a minimum of 60% secure

habitat should be conserved for grizzly bears in the Gravellies; similarly, the Project EA fails to take a hard look at cumulative effects, connectivity, and secure habitat for grizzlies, and the Forest Plan minimum of 60% secure habitat for grizzlies.

16. Both the USFWS and the Forest Service are violating the NEPA and the ESA by apparently using a false definition of grizzly bear security to measure project impacts on grizzly bears.

Although the agency cites the Proctor et al. (2019) grizzly bear paper as per recommendations for security (60% of the landscape), the agency failed to include the complete definition provided by this paper, which is that grizzly bear security areas not only need to be at least 300 meters from an open road, but they need to be at least 2,500 acres in size. The BDNF Forest Plan provides a false definition of grizzly bear security areas as 10 acres in size. The NEPA analysis for this project did not define what, if any, size requirement was being used to measure security; instead, only distance from roads was identified as a criteria. There is no current science cited as to this definition; a description of the actual 10 acre size of security areas and the scientific rationale and bear experts that created this definition are unknown. This information was never provided in the Forest Plan FEIS. So the actual amount of grizzly bear security in the Greenhorn Vegetation Project Area is unknown. Even with the use of only 10 acres as a requirement for security, the GBAU for this project falls below the Forest Plan recommendation. It is unknown what the actual quality of grizzly bear habitat currently is, or will be during project activities, as well. So the actual impact of this project on grizzly bears has never been evaluated, in violation of the NEPA and the ESA.

17. The Greenhorn Vegetation Project will violate the BDNF Forest Plan by failing to demonstrate habitat connectivity for lynx will be "maintained" in the project area during and after project activities.

The Greenhorn Vegetation project will reduce cover for lynx travel on 15,285 acres. This is 36% of the 41,900 acre project area. The current best science defines lynx habitat connectivity as roughly 70%, including about 50% mature forest habitat and 20% regenerating forests (Kosterman et al. 2018). In addition, Holbrook et al. (2018) reported that any type of vegetation treatment in lynx habitat results in significant avoidance of that area for at least 10 years, and possibly up to 43 years, or the time period of their research data. Thus it is impossible for the Forest Service to meet the Forest Plan standard ALL S1, which requires connectivity to be maintained. Also, the Northern Rockies Lynx Management Direction is a violation of the NFMA and the NEPA because the criteria for what constitutes "maintenance" of connectivity is never defined. This makes this a meaningless standard. The agency did not evaluate how this project will impact connectivity, although it was noted that this Forest Plan standard would be met, in violation of the NEPA, the NFMA and the ESA.

Regards,

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

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-410-3373; wildrockies@gmail.com.

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