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Objection Reviewing Officer
Beaverhead Deerlodge National Forest
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Re: Beaverhead-Deerlodge Forest Plan Amendment Objection

This objection is filed on behalf of Yellowstone to Uintas Connection. We have previously submitted comments and due to concerns, are attaching those comments to this objection.

Our first concern is about the corruption of the Forest Service by the current administration and selling out to extractive interests. This is exhibited in the screenshot of the BHDL website which leads off with a political statement, *"The Radical Left Democrats shut down the government. This government website will be updated periodically during the funding lapse for mission critical functions. President Trump has made it clear he wants to keep the government open and support those who feed, fuel, and clothe the American people."* Prior Executive Order and press releases by the administration and Forest Service Chief have demonstrated the intent to bulldoze environmental protections in favor of "active forest management". See my attached article demonstrating how Wildland Urban Interface is mapped on the BHDL as covering 1.6 million acres or 44% of the BHDL, yet when an actual analysis of structure density is done, it should be 35,000 acres, or 2% of the BHDL. This exaggeration of WUI allows the BHDL to use HFRA to claim categorical exclusions and avoid analysis and public input or objections.

We are faced with an agency and decision that is produced with a mandate to ignore the Code of Ethics for Federal Employees and Scientific Integrity. The question for the BHDL is whether it is even capable of doing an honest, ethical analysis and decision given its administration and leadership. We don't think this is possible. However, below we outline the main points of our objection which are covered in our comments.

Sincerely,

A handwritten signature in blue ink that reads "John G. Carter".

John Carter, PhD and President
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October 12, 2025

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Objection Points

1. Using an EA for a plan amendment is considered a significant change or environmental effect requires an EIS.
2. The EA defines lynx habitat in a procedure that minimizes that habitat and considers it as a static, not dynamic state as experienced by lynx.
3. The EA does not identify or protect linkage areas to connect the habitat that it does claim exists.
4. It omits inclusion of habitat that the Olson et al (2021) Model and the Montana Natural Heritage Program Inductive Model include. We analyzed these in our scoping comments. These are critical to fill in gaps from the BHDL 2020 Model and provide discrete linkage pathways on the Forest that connects more suitable habitat.
5. The BHDL LAUs and habitat model eliminates a large swath of the landscape that contains historical lynx observations and omits habitat in the Dillon and Butte Ranger Districts that was included in the 2001 Model.
6. The 2001 Model better represents lynx habitat to include connectivity and incorporate the results of the Olson and Montana Heritage Models.
7. We provided figures A – G showing these omissions.
8. The Modeling is arbitrary and a matter of convenience because it has omitted consideration of lynx habitat where historical observations revealed lynx presence.
9. The absence of lynx from the BHDL following listing in 2000 has not been explained in relation to the massive deforestation occurring here in the last half of the past century and the explosion of motorized recreation.
10. The BHDL analysis must address why, with its claimed 1,625,805 acres of lynx habitat and intensive surveys, there were no lynx found for nearly 20 years following its listing as threatened.
11. A view of the regional national forests using the Olson et al (2021) model shows that the BHDL is an important connection between the GYA and Northern Rockies.
12. Forest Plan Standards must be established to identify, restore and maintain linkages and connecting habitats.
13. The 2020 BHDL BA Model
 - a. The Model is flawed in that it uses the current modified forest structure to define “surrogate” habitat as opposed to the historical habitats used by lynx.
 - b. The Model relied on modeled snow depths for an arbitrary period of December - May as criteria, and constrained habitat by aspect and elevation. Lynx denning occurs during late spring.¹ The use of this arbitrary period ignores the variability in seasonal snow patterns from year to year in a dynamic, not static system. The Model

¹ Olson, L.E., Squires, J.R., DeCesare, N.J., and Kolbe, J.A. 2011. Den use and activity patterns in female Canada lynx (*Lynx Canadensis*) in the Northern Rocky Mountains. Northwest Science, Vol. 85:3.
https://www.fs.usda.gov/rm/pubs_other/rmrs_2011_olson_l001.pdf

- paints a black and white picture and does not reflect reality on the ground as experienced by Canada lynx.
- c. Our analysis of 29 SNOTEL station data in and around the BHDL shows that snow depth is not a constraint for lynx in the BHDL.
 - d. Analysis of historical lynx observations in the BHDL show that slope, aspect and elevation are not constraints for lynx in the BHDL.
 - e. The Model used surrogates for habitat such as structural classes, e.g. stem exclusion rather than the actual habitat types where lynx were historically observed. It only focused on subalpine fir, spruce, and cool-moist Douglas-fir, yet both our analysis and the Montana Natural Heritage Program found that lodgepole pine forest was the dominant forest type.
 - f. The Model relied on VMAP and did a crosswalk with structural stages that includes major modifications from the historical forest vegetation types. This is an attempt to accept the modified forest as a baseline, rather than the habitats lynx have relied upon through the historical record. VMAP has a significant error rate which we illustrated using an aerial image showing the stem exclusion category is misrepresented.
 - g. The Model relies on the Wildland Urban Interface exemptions to NRLMD to request an exemption of 88,910 acres. Our analysis of WUI for the BHDL shows that instead of 1,644,663 acres of WUI, it should only be 34,663 acres. The Forest Plan amendment must correct this huge disparity with an analysis that accounts for building density.
14. We reviewed 2012 Planning Rule sections cited in the Scoping Notice, the ESA, and Forest Service Manual provisions that should apply.
- a. While the Scoping Notice invites public comment, by including the 2020 lynx habitat map, it presupposes this is the lynx habitat that will be the basis for the plan amendment, thus pre-empting public input.
 - b. The Planning Rule expects the restoration of ecological integrity, diversity of plant and animal communities and species viability, multiple use, and listed timber requirements. All the elements listed in those sections will need specific standards in the plan amendment.
 - c. The ESA makes biological assessments “discretionary”. These should be required in the plan amendment for all future projects.
 - d. The FSM cites the ESA to maintain species viability, and conduct activities to assist in the recovery of T&E species.
 - e. The FSM defines “Essential Habitat” to include areas needed for recovery of T&E species.
15. The Biological Assessment (BA) for Canada lynx Effects of the 2009 Revised Forest Plan and the Northern Rockies Lynx Management Direction, Appendix H, does a comprehensive review of NRLMD goals, objectives, standards, and guidelines and how existing Forest Plan provisions apply to each. We have seen no evaluation that the NRLMD has been effective, or for that matter, the 2009 BHDL RFP. Standards are missing for most of the NRLMD goals, objectives, and guidelines in the 2009 RFP. Goals, objectives and guidelines are

without enforcement and need quantitative, not general, standards. The Forest Plan Amendment must now go through each of these NRLMD provisions and provide standards for each NRLMD Direction.

Our attached comments on the Canada Lynx Species Status Assessment, Draft Recovery Plan and Revision to Critical Habitat cover the science and history of lynx management. These demonstrate a continuing effort to discount human impacts, minimize and redefine habitat from that lynx historically used.