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To: Objection Reviewing Officer

USDA Forest Service, Northern Region 26 Fort Missoula Road

Missoula, MT 59804

OBJECTION

AGAINST THE ELK SMITH SUPPLEMENTAL PROJECT DRAFT DECISION NOTICE AND FINDING OF NO
SIGNIFICANT IMPACT

1. Name of Objectors:

Sara Johnson, Lead Objector; Director, Native Ecosystems Council (NEC), PO Box 125, Willow Creek, MT
59760; phone 406-579-3286.

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-459-3659.

4

Signed for Objectors this 1st day of November, 2020

2. Name of the Project being Objected to:

Elk Smith Supplemental Project.

3. Location of the Project being Objected to:

Rocky Mountain Ranger District of the Helena-Lewis and Clark National Forest.

4. Responsible Official for the Proposed Project:

Michael Munoz, District Ranger, Rocky Mountain Ranger District of the Helena-Lewis and Clark National Forest.

5. Connection between the Proposed Project and Prior Public Involvement Provided by Objectors:

On May 25, 2019, Native Ecosystems Council and the Alliance for the Wild Rockies submitted an Objection against the Elk Smith Project. The public was notified that it was not necessary to file a new objection against the Elk Smith Project if a previous objection had already been filed.

However, a new objection could be filed if objectors wish to address new issues that have arisen since the May 25, 2019 objection was filed, or to address how scientific publications published since that initial objection date promote a better understanding of how the Elk Smith Project will impact wildlife, including the threatened Canada lynx (hereafter "lynx"). We also wish to include several publications on the wolverine that were not addressed in the current Biological Assessment for the Elk Smith Supplemental Project or in our previous Objection. The related new information we are addressing in this objection include the following:

a. A new issue is the significant decline of North American birds since the 1970s, a decline that was well-publicized in the fall of 2019 triggered by a scientific publication by Rosenberg et al. (2019); this significant issue was not addressed for the current analysis of the Elk Smith Project, including documentation that this project complies with the Migratory Bird Treaty Act.

b. We have included a paper on lynx management by Holbrook et al. (2019) that summarizes a large body of research regarding a landscape

approach to promoting high quality habitat for female lynx in regards to successful reproduction; although this new publication was included in the Elk Smith Biological Assessment, we used this new paper to point out the continued failures of the Northern Rockies Lynx Management Direction (hereafter "Lynx Amendment") to provide a valid assessment of management impacts on the threatened Canada lynx (hereafter "lynx"), or to promote lynx conservation in the Northern Rockies.

c. We have included a publication by Peers et al. (2020) that addresses how climate change will impact persistence of the lynx; the Lynx Amendment does not address climate impacts on the lynx.

d. We have included a publication by Hutchen and Hodges (2019) that addressed the impact of wildfire size on snowshoe hare relative abundance, as well as demonstrates the key importance of fire-created habitat for the lynx.

e. We have included a publication by King et al. (2020) on the highly restricted distribution of lynx in Washington; this article emphasizes a severe failing of the Lynx Amendment to identify and protect those limited areas of the landscape that are occupied by lynx, even though this management approach was recommended by lynx researchers before the Lynx Amendment was implemented.

f. We are including a number of publications and/or articles on the wolverine that were not included in our original objection, or in the Biological Assessment for the Elk Smith Supplemental Project, including Kuglin (2018), Scrafford and Boyce (2018), Scrafford et al. (2018), and Stewart et al. (2016), since these provide important information on habitat use of the wolverine that needs to be considered in project impacts. Some additional papers we have included address the importance of having habitat criteria for management of big game winter range, instead of just simply stating that burning will miraculously "improve" big game winter range, as is claimed in the Elk Smith Project.

g. We have also added some additional supporting information as per references to better address the new publications included in this 2nd objection, including Walker (2005), Squires (2002), and McKelvey et al. (1999).

The relevant portions of the above reports and/or publications are provided in Appendix A of this Objection.

6. Remedy

As is demonstrated in the following Statement of Reasons, we believe that the Elk Smith Project, as defined in the Supplemental Analysis and Draft Decision Notice, is a violation of the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the National Forest Management Act (NFMA), and the Administrative Procedures Act (APA). The Project will also violate the Migratory Bird Treaty Act (MBTA) and the Roadless Area Conservation Rule (RACR). As such, this project needs to be withdrawn.

The Project will violate the NEPA, NMFA and the ESA by failing to apply a conservation strategy for lynx and lynx critical habitat that ensures persistence and recovery of this threatened species. The Project will violate the

NEPA by failing to disclose that the proposed project will create severe adverse impacts on lynx and lynx critical habitat. Because a "hard look" was not taken of project impacts on the lynx, the agency failed to demonstrate no significant impacts will occur to the lynx and other wildlife, impacts that would require completion of an environmental impact statement. The Project will violate the ESA by creating significant long-term adverse impacts of lynx critical habitat. The Project will violate the NFMA and ESA by failing to monitor management impacts on lynx populations. The Project will violate the NEPA and NMFA by failing to disclose the significant adverse impacts the Project will have on the wolverine.

The Forest Service needs to update the current management direction (Forest Plan direction) for the lynx based on the current best science so that lynx populations are promoted rather than jeopardized, with full public involvement, before any additional management actions are implemented in lynx occupied habitat. A key part of this new conservation strategy is that occupied lynx home range need to be identified, and subsequently monitored for reproductive success and persistence. A valid conservation strategy also needs to be developed for the wolverine so that vegetation management projects promote persistence of this vulnerable species. Wolverine use in the landscape also needs to be monitored via reliable remote camera sensing.

7. Statement of Reasons

A. Measuring project impacts on the lynx with the Northern Rockies Lynx Management Direction (here after "Lynx 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) because the Lynx Amendment does not measure the key habitat features for lynx as have been identified by the current best science.

AI . The Lynx Amendment only addresses pieces of lynx habitat.

The impact of projects on lynx cannot be measured unless the entire landscape being used by lynx is assessed. All of the current best science analyses of high quality lynx habitat measure habitat across the entire landscape, or 100% of the landscape (e.g., Kosterman 2013; Kosterman et al. 2018; Holbrook et al. 2018; Holbrook et al. 2019). However, the Lynx Amendment only requires that areas within a Lynx Analysis Unit (LAU) that

are "considered" lynx habitat. The LAU for the Elk Smith Project is a good example. The LAU RM-25 contains 19,720 acres, but only 11,148 acres are considered as lynx habitat [Table 1 at Biological Assessment (BA) 7]. This results in only 57% of the landscape being managed for lynx, and in turn, being assessed for project impacts on lynx. For this RM-25 LAU, there are 8,572 acres (19,720 acres in the LAU minus 11,148 acres identified as lynx habitat) that are not accounted for, either in defining lynx habitat, or in measuring project impacts on lynx habitat. And of these 8,572 unaccounted[shy] for acres in the LAU, 3,676 acres will have prescribed burning and/or slashing.

Total acres treated: 10,329 (Table 5 at BA 9; BA 8)

Acres treated outside the LAU: 1, 565 (BA 11)

Remaining treated acres in LAU: $10,329 - 1,565 = 8,746$ acres Acres treated in LAU in lynx habitat: 5,088 (Table 3, BA 8).

Acres treated in LAU not lynx habitat: $8,746 - 5,088 = 3,676$ acres Percentage of treatment units excluded as lynx habitat: 42%

Therefore, the Elk Smith Project will affect 3,676 acres of habitat in the LAU that will, according to the Lynx Amendment, have no effect on lynx habitat or lynx persistence. These acres comprise 18.6% of the LAU (3,676 divided by 19,720 total LAU acres). And as noted above, these unaccounted[shy]

for acres of impact on lynx habitat account for 42% of the total acres to be treated in the LAU (3,676 divided by $8,746 = 42\%$). There is no current published science that demonstrates that significant portions of the landscape occupied by lynx have no affect on their habitat use or productivity.

A2. The Lynx Amendment shows that the Elk Smith Project promotes persistence of the lynx even though created openings and stand initiation forest will exceed levels found in productive lynx home ranges by over 3 times.

Preferred lynx habitat, where female lynx can successfully raise kittens, have very limited amounts of openings and sparse forest. Kosterman et al. (2018) included a habitat category of "open" in productive female lynx core areas, and reported these averaged only 4% of this core home range.

Holbrook et al. (2019) reported that stand initiation habitat, which would be open, comprised on average only 5% of high quality female lynx home ranges. The Elk Smith analysis did not define what the percentage of openings, and stand initiation habitat, currently is or will be after project implementation. So this key habitat feature was not evaluated for this project.

The current level of natural openings and stand initiation habitat in LAU RM-25 where the Elk Smith Project is proposed is unknown, but could be higher than the amount typical of productive female lynx home ranges. First, the amount of openings in the 43% of LAU RM-25 not identified as lynx habitat is unknown. In the remaining 57% of the LAU that has been identified as lynx habitat, openings can be identified by the acreage of stand initiation habitat. These are 1,215 acres, as noted in Table 4, BA 8. This creates a landscape opening level of at least 6%. This is close to the typical level of openings found in productive female lynx home ranges. However, the proposed treatments will create an additional 2,107 acres of stand initiation or open habitat (Table 9, BA 12). This will bring the minimum known acreage of openings and/or stand initiation habitat up to 3,322 acres ($2,107 + 1,215$), or 16.8%. This would be 3 times the level found in a productive female lynx's core habitat or home range.

Then there are the 3,676 unaccounted for acres in the LAU, identified as non-lynx habitat, that will also be treated. A worst-case scenario would be that half of these treated acres will create openings, which would be roughly 1,838 acres of additional openings. This would bring the landscape level of openings in this LAU RM-25 up to 5,160 acres ($1,838 + 3,322 = 5,160$ acres). This would be 26% of this LAU (5,160 divided by 19,720 acres), which would be 5-6 times higher than reported for productive female lynx core and home ranges.

The proposed Elk Smith Project will clearly degrade lynx reproductive habitat by increasing openings/stand initiation habitat. However, according to the Lynx Amendment, this is not considered an adverse impact. This is because the Lynx Amendment only measures impacts on "pieces" of the landscape, and on these areas classified as lynx habitat, a total of 30% openings/stand initiation is allowed. This 30% allowance is based on the 1989 recommendations for lynx by Brittell et al. 1989 (33% created and natural openings), recommendations that were made 30 years ago before detailed research on lynx habitat use was published since 2014. Instead of considering that the 30% opening standard is highly inconsistent with the current best science, the Forest Service instead simply claimed that this 30% opening standard is being met with the Elk Smith Project. The Project BA at 12, Table 9, shows stand initiation habitat to increase from 11% to 30% "of lynx habitat" in the LAU RM-25. The BA at 13 states that this 30% stand initiation habitat is allowable as per the Lynx Amendment. In the case of this standard (VEG S1), the 30% stand initiation habitat includes areas affected by prescribed burning as well as logging.

The Lynx Amendment also has a restriction on the amount of early stand initiation stages that can be created in a 10-year period (15%) (VEG S2). But this restriction only applies to timber management projects, not prescribed burning projects (Project BA at 17). So even though the Elk Smith Project will increase openings on 19% of lynx habitat in this LAU within a 10-year period, (Table 9 in the BA at 12, going from 11% to 30%), this is acceptable in the Lynx Amendment because openings created by burning do not apply.

A3. The current best science shows that the most significant factor affecting lynx female productivity is the amount of well-connected mature forest habitat within the core and home range area (50-60%); yet the Lynx Amendment does not measure landscape-level mature

forest habitat, so is incapable of defining current or projected qualities of lynx habitat and lynx critical habitat.

The importance of contiguous cover over large areas for lynx was identified in the Region 1 Forest Service TES recommendations as far back as 1992. The Interim Direction for the management of TES species included the following management strategy: Maintain contiguous cover over large areas. Connectivity between cover is important; corridors should be at least 300 feet wide. Openings should be no less than 600 feet wide.

Also, in 1999, a number of lynx experts noted in a Forest Service Rocky Mountain Research Station publication that historically lynx landscapes were dominated by forests over 100 years old. Table 15.1 in McKelvey et al. (1999) summarized forest age structure based on fire cycles, and reported that based on the fire cycle within a given forest type, which would have ranged from 100, 150, 200 and 300 years, the average percentage of these landscapes in forests over 100 years in age would have ranged from 36%, 51%, 60% and 71%, respectively. They noted that "if the natural fire regime can be estimated for an area that is to be managed for lynx, then it is logical to use this rate to design management strategies."

More recently, the current best science has indicated that the level of mature forest cover (49-60%) within a female lynx's home range is key to productivity (Kosterman 2014; Kosterman et al. 2018; Holbrook et al. 2019). However, there is no standard in the Lynx Amendment that measures either the amount or connectivity of mature forest habitat, even in what is identified as "lynx habitat." This is because the categories of lynx habitat in the Lynx Amendment were developed back in 2000, when the Lynx Conservation Assessment and Strategy was developed. When the Lynx Amendment was finalized in 2007, it described the following categories of lynx habitat;

Old multistory forest structural stage: Lynx Amendment ROD at G- 13, many age classes and vegetation layers, multilayered forest with large trees in the uppermost layer; can have discontinuous canopy as older trees die.

Stem exclusion structural stage: Lynx Amendment ROD at G-14, intermediate and older forests with dense canopy with limited understory.

Understory reinitiation structural stage: Lynx Amendment ROD at G- 14, dense young trees begin developing as overstory breaks down.

Stand Initiation structural stage; Lynx Amendment ROD at G-14, young stands that develop after disturbance as fire or logging.

Unsuitable structural stage; Lynx Amendment ROD at G-12, stands harvested or burned that are now less than 10-30 years old.

Without any Forest Plan amendments, the definitions of lynx habitat in the Lynx Amendment have been progressively changed, as defined in the Elk Smith BE, Table 2, in the footnotes. These new structural stage definitions include early stand initiation (ESI), Stand initiation (SI), Multistory (MS), Stem exclusion (SE), and Other (Other). Winter snowshoe hare habitat is predicted to occur in the SI and MS stages only, although no actual documentation was provided to demonstrate how this was determined.

It is not possible to measure the level of mature forest habitat, the key feature in productive lynx home ranges, with the original or altered definitions of lynx habitat as applied in the Lynx Amendment. For this to be possible, the Lynx Amendment needs to be revised so that there is a category consistent with the category of "mature forest" as is defined in all of the current science for lynx habitat use. For example, Holbrook et al. (2017a) defines lynx habitat by 4 categories, including sparse, stand initiation, advanced regeneration, and mature. Holbrook et al. (2018) defines lynx habitat also with 4 categories, including stand initiation, sparse, advanced regeneration, and mature. Kosterman (2014) defined lynx habitat as open, thin forest, young regeneration, old regeneration, and mature.

Holbrook et al. (2019) defined lynx habitat as stand initiation, sparse, advanced regeneration, and mature. And Kosterman et al. (2018) defined lynx habitat as open, sparse, small-diameter regeneration, medium-diameter regeneration, and mature. It is notable that all 5 of these lynx habitat classifications, all published subsequent to

the Lynx Amendment, include a mature forest category. And this mature forest category was the basis for the research findings in all of these publications that the amount of mature forest habitat in the landscape occupied by lynx is key to the levels of lynx productivity. This means that the Lynx Amendment does not, nor can not, measure the key habitat feature affecting lynx persistence, and thus conservation.

Using the levels of habitat identified as "lynx habitat" in the Elk Smith BA, it is possible to make a rough estimate of the availability of "mature forest" in LAU RM-25. As per Table 9 in the Project BA at 12, there are 3 structural stages that could be providing mature forest habitat for lynx. These include multistory, stem exclusion, and other. These comprise 1,220, 1328, and 1,418 acres of LAU RM-25, for a total of 3,966 acres. This would mean mature forest comprises at least 20% of LAU RM-25 (3,966 divided by 19,720 acres in the LAU). This would be a severely low level of mature forest connectivity reported for productive female lynx home ranges, or 49- 60%. However, this likely severe shortage of a key habitat feature for productive lynx habitat is never noted in the Project BA or draft DN.

A4. The proposed burning of young forest in the Elk Smith LAU is the exact opposite of what the current best science directs for lynx habitat management, and is a significant adverse and long term adverse impact on lynx critical habitat.

The agency's goal to exacerbate the current shortage of mature forest habitat in the Elk Smith lynx critical habitat is a direct violation of the ESA. The current best science demonstrates that a large quantity of contiguous mature forest is an important factor in lynx persistence. There is clearly a need for an increase of mature forest habitat in this critical habitat, not a need to reduce it. The burning of these 30-year old lodgepole pine stands will delay these acres from recruiting into mature forest habitat needed by lynx. The agency's rationale for burning up 30-year old lodgepole pine stands in critical lynx habitat is also a violation of the APA, as this is an illogical management proposal for lynx conservation.

B. The Lynx Amendment is a violation of the NFMA as well as the ESA because the proxy for monitoring lynx population trends is invalid, which means there is no actual population monitoring being done to determine how effective the Lynx Amendment is in conserving lynx and lynx critical habitat.

The current status of the lynx population in the Northern Rockies is unknown. The Forest Service, Region 1, noted that back in the mid-1970s, there were 300 lynx trapped in Montana (USDA 1992). By the 1990s, lynx trapping was limited to one per year (Id.). Although the population trends were clearly downward, there is no actual information provided in the Elk

Smith BA in regards to the current population trend of lynx. This is because the Lynx Amendment does not require population monitoring of lynx in areas where the amendment is being applied. Instead, there is a proxy for lynx population trends, which is the acreage of exemptions implemented in lynx habitat, as well as lynx critical habitat. There is no connection ever made between acres of treated habitat and lynx populations.

The failure of the Lynx Amendment to require actual population monitoring of the lynx is a clear violation of the NFMA. For example, the sage grouse amendment does require not only population monitoring, but identifies population triggers that will require assessments of the habitat management program to determine if these are

working, or why they aren't working (USDA 2015). And the sage grouse is not even listed as a threatened species.

C. The Lynx Amendment is a violation of the NEPA, the NFMA and the ESA because it allows random habitat removal for a species that was known to have a restricted distribution across occupied habitat at the time the Lynx Amendment was developed; this limited distribution continues to be noted in lynx habitat.

In 2002, Dr. John Squires provided comments on the LCAS (2000), which was the basis for the Lynx Amendment. He noted that "the few areas that support lynx populations need to be identified and managed accordingly; these actions may be greater than those described in the LCAS." He also noted that "the LCAS provides minimum standards that guide management in areas that may or may not support lynx populations. However, management guidelines described in the LCAS do not account for site[shy] specific needs of known populations in areas like Seeley Lake, MT." Dr.

Squires also noted that we do not know if the LCAS standards will provide for lynx viability.

More recently, a large-scale research project on lynx in the state of Washington reported that lynx were found in only 20% of their potential habitat (Weintraub 2020). King et al. (2019) reported that their results paint a concerning picture for lynx in Washington, with a very restricted distribution. This lack of population redundancy was concerning for population persistence. Their work revealed the precarious status of lynx in Washington today and in the future. They noted that identification of areas

currently occupied by lynx is essential for protection and management of this species. They also noted that the broad-scale camera detection methods they used were highly effective in monitoring lynx presence over large landscapes.

It has been previously identified that areas where lynx currently exist need to be identified and managed for lynx persistence. This has yet to be done with the lynx amendment. It will be impossible to conserve this species with its very restricted distribution without knowing where they are. This is essential information before any vegetation management projects are implemented in a landscape. Otherwise, the Lynx Amendment is simply random habitat removal. If the 6% exemptions occur within an occupied, productive female lynx territory, it will be eliminated without any awareness of this likely severe impact on lynx persistence, especially if this 6% application occurs repeatedly in occupied lynx habitat.

King et al. (2019) noted that it is quite effective to determine where lynx occur via remote camera detection systems. This type of monitoring is essential before any vegetation management is planned in lynx habitat, as well as lynx critical habitat.

D. The Elk Smith Project analysis did not address the impacts of climate change on lynx persistence, in violation of the ESA and the NEPA; the failings of the Lynx Amendment will exacerbate ongoing climate-change impacts

on lynx.

A recent publication by Peers et al. (2020) included the following abstract: Canada lynx and snowshoe hares form a keystone predatory-prey cycle that has large impacts on the North American boreal forest vertebrate community. Snowshoe hares and lynx are both well-suited for snowy winters, but climate change-associated shifts in snow conditions could lower hare survival and alter cyclic dynamics. Using detailed monitoring of snowshoe hare cause-specific mortality, behavior and prevailing weather, we demonstrate that hare mortality risk is strongly influenced by variation in snow conditions. Although predation risk from lynx was largely unaffected by snow conditions, coyote predation increased in shallow snow. Maximum snow depth in our study area has decreased 33% over the last 2 decades and predictions based on prolonged shallow snow indicates that future hare

The predicted reduction in snowshoe hare winter survival levels reported in this study indicate that the lynx will be directly affected by climate change with reduced prey levels. This long-term impact indicates that the failings of the Lynx Amendment need to be corrected, since these failings are being exacerbated by the reduced survival levels of hares in lynx habitat.

Also as noted in Peers et al. (2020) large fires are increasingly common, with wildfires in many regions burning larger and more frequently than during historic fire regimes. Given this increased loss of mature forest habitat with climate change, it is essential that the Forest Service protect remaining mature forest in lynx habitat in order to avoid exacerbating the ongoing and future loss of mature forest habitat created by climate change.

E. The Elk Smith Project analysis did not address the beneficial impacts of large wild fires on snowshoe hares, and thus lynx; the agency did not take a "hard look" at removing high quality snowshoe hare habitat in the LAU RM-25, nor address that recruitment of similar high quality hare habitat is unlikely in the future.

A recent publication by Hutchen and Hodges (2019) reported that large patches of young regenerating lodgepole pine created from wildfire provide optimum habitat for snowshoe hares; snowshoe hare abundance was highly correlated with the number of sapling trees, especially lodgepole pine; sapling densities were highly variable but dense stands of saplings were found only in burn scars of large wildfires. The conclusion of this research was that managers should protect areas with dense regeneration post fire, as these sites are necessary for hares after large wildfires.

What was noteworthy in this publication, a factor that was also noted in McKelvey et al. (1999), that fires are more likely to create dense patches of lodgepole pine regeneration due to serotinous cones. It is unlikely the burned regeneration patches of lodgepole pine in the Elk Smith Project Area will ever be reestablished after this second burn, as these stands are only 30 years old and will not have built up a large supply of serotinous cones. Thus the survival could resemble that seen during population declines; our results indicate that climate change could disrupt cyclic dynamics in the forest.

winter/spring ranges will have a direct impact on wolverine, and this connection needs to be accurately assessed, especially given the sensitive status of the wolverine.

G. The agency has failed identify a significant new issue on the ongoing decline of North American birds, or western forest birds, in violation of the NEPA; there are also no actual management objectives for the 60 or so bird species that could occur in the Elk Smith landscape, in violation of the MBTA.

There has been considerable news in late 2019 regarding the alarming loss of North American birds, with a loss of 29% of their abundance in 1970 (Rosenberg et al. 2019). Reports of this decline included publications in newspapers as well, such as the Bozeman Daily Chronicle (2019), the New York Times (Fitzgerald and Marra 2019), the Week magazine (2019), and the Montana Outdoors Magazine published by MFWP. That Montana Outdoors article noted that western forest birds have declined by almost 30% since the 1970s. Since the Elk Smith project proposes to change the vegetation on many thousands of acres in the respective project area, it is not possible that this project will have no impact on forest birds. There is no actual analysis in the wildlife report, EA or draft DN on project impacts on forest birds, however.

H. As we previously noted, the Elk Smith Project is a violation of the Roadless Area Conservation Rule (RACS).

The proposed project will impact mostly inventoried roadless lands. The area burned in 1988, or approximately 30 years ago. Thus fire does not need to be restored to the landscape. The project will remove habitat for the threatened lynx, threatened grizzly bear, elk and mule deer winter and spring ranges, prey for the wolverine and goshawk, and developing forest habitat for a large number of western forest birds. The project will result in 10 years of disturbance from slashing trees, prescribed burning from ground activities, and prescribed burning by aerial ignition for at least 10 years, but likely much longer, with resulting disturbances to all wildlife present in this landscape. There is no identified ecological need to manage resources in this landscape, since the goal is fuels management. Fuels do not constitute a resource. In fact, this project is ecologically unsound as the agency is attempting to force an unnatural fire cycle onto these roadless lands. As noted in McKelvey and others (1999), most mid-elevation forests in the Northern Rocky Mountains have a fire cycle from 100-300 years. A 30-year fire cycle in lodgepole pine is not natural, and would not constitute restoration of these roadless lands.