Data Submitted (UTC 11): 1/24/2024 8:00:00 AM
First name: Jace
Last name: Hogg
Organization: Idaho Governor's Office of Species Conservation
Title: Federal Lands Coordinator
Comments: January 24, 2024 Attn: Nez Perce-Clearwater Forest Plan Objection

Regional Forester Leanne Marten Northern (R1) Regional Office 26 Fort Missoula Road

Missoula, MT 59804

RE: Nez Perce-Clearwater National Forest Revised Land Management Plan and Nez Perce[shy] Clearwater List of Species of Conservation Concern Objections

Dear Regional Forester Marten,

The Idaho Governor's Office of Species Conservation (OSC) is writing on behalf of OSC and the Idaho Department of Fish and Game (IDFG) to submit objections to specific points, analysis, and lack of analysis within the Nez Perce Clearwater National Forest's Revised Land Management Plan and management of species within the list of Species of Conservation Concern (SCC).

Many of the objections included in the statement of issues below, specifically regarding the application of the Natural Range of Variation (NRV) and setting of desired conditions outside of and departing from the NRV, the level and distribution of vegetation management in fisher habitat, lack of incorporation of cooperatively recommended elk components, and other issues are not new ideas or questions that have risen from in this latest round ofreview. These are long-standing issues that have never reached a resolution despite the State's involvement in the lengthy revision process as a cooperating agency. While the State appreciates the cooperation, dedication, and work of the Forest Service staff to try and push this Forest Plan revision across the finish line, there are multiple points that the State strongly feels should be resolved before the signing of the final decision.

The State wants to see the Forest be successful in managing the diverse wildlife habitat, timber, recreation, mining, and the many other values the Forest holds, but do so in a manner that is consistent with the best available science and Idaho values. The lead objector information is included below.

Sincerely,

Mike Edmondson, Administrator Office of Species Conservation

Idaho Department of Fish and Game

For the purposes of the objection process per (36 CFR 219.54(c)):

Name: Office of Species Conservation

Address: 304 N 8th St. Ste. 149, Boise, ID 83702

Telephone Number: 208 332 1553 Signature(s): sf Michael Edmonson Lead Objector: Jace Hogg

Project Name: Nez Perce-Clearwater National Forest Revised Land Management Plan, Nez Perce[shy] Clearwater List of Species of Conservation Concern

Responsible Official Name And Title: Leane Marten, RI Regional Forester, Cheryl Probert, Nez Perce Clearwater Forest Supervisor

Name Of Affected National Forests or Ranger Districts: Nez Perce Clearwater National Forest Reasons For And Suggested Remedies To Resolve Objections: See Statement of Issues below. Description Of Connection Between Project And Prior Comments: Included within Statement of lssues below.

Statement of Issues for the Nez Perce Clearwater Forest (NPCF) Land Management Plan (Plan)

Objection Topic: Evaluation of Alternatives and Effects Relative to Vegetation Management andWildlife Habitat/Resources, including Application of NRV and Coarse/Fine Filters

Issue: This topic concerns the assessment and selection of vegetation management actions relative to wildlife habitat and resources.

Section 102(2)(E) of the National Environmental Policy Act (NEPA) requires federal agencies to study, develop and describe a range of reasonable alternatives to a proposed course of action, including those that involve competing uses of available resources. The FEIS for the Plan did not evaluate a reasonable range of alternatives for vegetation management and corresponding alternatives for wildlife resources. The narrow range of alternatives does not allow consideration/comparison of the associated range of effects on the competing needs of the variety of fish and wildlife species on the Forest that would occur with different proportions and configurations of wildlife habitats.

All alternatives in the FEIS implement essentially the same desired conditions for vegetation and corresponding wildlife habitat. The Forest Plan's Desired Conditions call for large changes in the current dominate cover types across the forest: 530,000-645,000 acres of treatment every decade through vegetation treatment and fire, generally outside of the Management Areas encompassing wilderness and proposed wilderness. The Plan's described change from existing condition is larger than what would be expected by moving from existing condition to Natural Range of Variation (NRV) and the coarse filter concept described under the USFS 2012 Planning Rule. Indeed, the Plan's Desired Conditions for vegetation appear to differ significantly from NRV. Implementing the Plan would result in the largest change in dominate cover type on the Forest since the 1910 fires.

Until the issuance of the FEIS, IDFG's understanding, based on our lengthy involvement with the forest planning process, has been that the NPCF intended to "restore" Forest vegetation conditions by managing towards NRV. The 2012 Planning Rule provides direction to maintain a diversity of animal communities and the persistence of native species through an emphasis on a coarse filter approach with NRV management (FSH 1909.12 23.11 (l)(c)). Further, plans must provide the ecological conditions to both maintain the diversity of plant and animal communities and support the persistence of most native species in the plan area (USFS 2015). Section 219.8 of the 2012 Planning Rule requires that forest plans provide for ecological sustainability within Forest Service authority and consistent with the inherent capability of the plan area. Ecological sustainability is provided through ecosystem integrity. Ecosystem integrity is defined as "the quality or condition of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and

diversity) occur within the natural range of variation and can withstand and recover from most perturbations imposed by natural environmental dynamics or human influence."

The narrow range of FEIS alternatives include relatively minor variation in wildlife habitat due to differences in acres of potential wilderness, Management Area (MA) acres, and pace of implementation. In a shift in approach from the DEIS, the narrow alternatives in the FEIS are based on desired conditions that represent large departures from NRV and future management at levels that stay outside of NRV. The Forestlands section and Appendix B includes desired conditions and analysis indicates that the Plan's management of most tree species is for conditions significantly outside of NRV. Composition and structure are key components of wildlife habitat, and managing these outside of NRV departs from the coarse filter assumption of wildlife habitat beneficial to most species. In addition to consideration of a narrow range of alternatives, the FEIS and Plan do not provide wildlife components on a finer scale for assessment of the management impacts that are significantly outside the NRV.

The Plan and FEIS list climate change and economic choices as part of the reason for managing these departures from NRV. The NRV analysis is supposed to include a wide range of climate change outcomes for up to 1000 years into the future. The NRV analysis also displays the hotter dry portions of that modeling effort separately (this is common climate change prediction for the NPCF). The FEIS and Plan do not provide a clear explanation of why accommodating climate change compels rejecting the NRV analysis and instead managing so far outside of NRV. We assume most of these deviations from NRV are not for economic reasons, as they are also implemented in MA 1 (Wilderness) and MA2, which is in roadless areas with no plans for commercial timber harvest management.

Forest resiliency and provision of economic value from portions of the Forest are readily supportable in concept. However, the FEIS lacks a reasonable range of alternatives that includes different habitat configurations, such that the agency may consider the range of effects (both benefits and tradeoffs) on the competing needs of different species as it determines how to realize these concepts. Potential impacts from a reasonable range of

alternatives may be further obscured because the Plan does not describe what forestry practices are needed to accomplish changes in the dominate cover type.

A reasonable range of alternatives should also include active management options in wilderness and proposed wilderness relative to control of disease (e.g., Mycoplasma ovipneumoniae in bighorn sheep and mountain goats, chronic wasting disease in deer, elk and other ungulates, and white pine blister rust), invasive insects, and invasive plants (e.g., knapweed and rush skeleton weed) that pose unacceptable loss of wilderness resources and values. See, e.g., 50 CFR 35.6 and 35.7.

Resolution:
* Revise the analysis to include one or more alternatives of habitat configurations within the NRV and an alternative with an intermediate NRV deviation (e.g., 50% of the desired condition, which deviates from the NRV).
* Revise the analysis to include one or more alternatives for actively managing MOVI and other disease and invasive weeds degrading habitat for elk and other species in MA1 and MA2.
* Revise analysis to include one or more alternatives for vegetation management that achieve elk objectives under the appropriate nutrition metric and motorized route distance. (see below Objection for elk).
* Revise analysis to include on or more alternatives for vegetation management within the NRV that provides fisher habitat to support at least 50 female home ranges with the increased model standards (see below Objection for fisher).
* Restore the 2019 DEIS language for FW-DC-ELK-01
Examples of Prior Comment regarding FEIS alternatives and NRV/Coarse Filter Approaches:
* IDFG Comment: The FEIS should explain why some specified Desired Conditions depart from NRV, and how NRV departures could affect fish, wildlife, and plant species using guidance below: "Forest Service Handbook (FSH) 1909.12 Land Management Planning Handbook

recognizes there may be other factors (social, economic, or ecological) that lead the responsible official to determine that the NRV may not be an appropriate desired condition for certain characteristics. These considerations include maintaining conditions that contribute to long-term resilience given uncertainties in future climate and disturbances, sustaining stand structures or species compositions that provide habitat for at-risk wildlife or plant species, conserving rare structures or components, existing or anticipated human use patterns, the effects changing climate may have, and ecosystem services expected from forest lands (such as reduction of fire hazard). The following factors are considered in the development of vegetation desired conditions: manage vegetation to generally be within the NRV, maintain conditions that would contribute to long-term ecosystem resilience and adaptation to uncertainties of future climate and disturbances, sustain important wildlife habitat conditions, and consider social and economic factors." (FEIS P62 -63)

* IDFG Comment: The Plan lacks Fine scale components which should be developed as needed and appropriate to address effects to fish, wildlife, and plant species of Forest Plan management departing from NRV as directed below: "The 2012 Planning Rule provides direction to maintain diversity of animal communities and the persistence of native species through a complementary coarse filter approach (FSH 1909.12 23.11 (1)(c)). The coarse filter components ensure that the broad habitat types and characteristics that support many native species are maintained. Fine[shy] filter plan components can be added when additional direction is needed to support a specific species. The plan must provide the ecological conditions to maintain the diversity of plant and animal communities and support the persistence of most native species in the plan area." (FEIS P607)
* IDFG Comment: Spatial patterns of clumps and gaps within individual forested stands and size and shape of forest patches across the landscape are important considerations for ecological processes such as fire spread, insect dispersal, and wildlife movement. Spatial patterns of live trees, snags, openings, etc., are also important for wildlife species and their use of habitats. The Forest should revise FW-STD-TBR-06 to consider ecological

processes of the existing landscape pattern and of surrounding forest openings when creating new openings using the following guidance: Forest Plan FW-STD-TBR-06

Objection Topic: Elk

Issue: Elk are a focal species of the Plan. IDFG spent a substantial amount of time working with the NPCF, Nez Perce Tribe, USFS Research, and USFS Region 1 personnel as an "elk team" to develop Plan components to support elk management and elk habitat. IDFG also spent time discussing the Forest's use of Clearwater Basin Collaborative (CBC) research and other best available science (mostly from USFS Research) to develop elk components for the Plan. Cooperating State agencies and the NPCF also had a follow-up meeting on the elk planning.

Given this investment in collaboration and communication, IDFG was surprised to see changes in the FEIS's elk plan components that are contrary to our agencies' previously expressed intent, as well as the elimination of cooperatively recommended components, without a clear explanation or consultation. The FEIS does not describe the management approaches or provide analysis for these changes. The FEIS and Plan also do not explain why the Plan does not apply CBC research and other best available science.

A fundamental issue is the FEIS' selection of a metric that does adequately gauge quality of elk habitat. The FEIS selected 2.6 kilocalories per gram dietary digestible energy (DOE) as representing moderate- and high-quality habitat. The 2.6 kilocalories per gram (ODE) represents a minimum level of nutrition (malnourished) to support a lactating female. This 2.6 level of nutrition still has increased levels of calf mortality as well as performance issues for lactating adult females, including reduced pregnancy

rates. The FEIS should apply ?.2.75 kilocalories per gram (DDE) as a more appropriate level for identifying moderate- and high-quality elk habitat.

The elk analysis in the FEIS and related elk objectives also do not align consideration of open motorized routes with consideration of elk habitat quality, even at lower selected kilocalories. For example, the FEIS found that 38 of the HUC 12 drainages lacked moderate and high-quality elk habitat in MA3 due to the impact of motorized travel. The FEIS elk analysis states "When the system of motorized routes is considered, 78 watersheds currently do not provide at least 10 percent of the area of watersheds outside of one-half mile from an open motorized route. A total of 53 watersheds has between 10 and 20 percent of their area producing at least 2.6 kilocalories per gram dietary digestible energy (DDE), and about 107 HUC12 watersheds provide more than 20 percent of their area with at least 2.6 kilocalories per gram DDE (Table 295). From an elk habitat perspective, these conditions leave many areas of the Nez Perce-Clearwater without adequate available nutrition to support good elk body condition and pregnancy rates. A total of 95,195 acres of treatment would be required outside of one-half mile from a road to allow the 78 watersheds to reach a minimum of 10 percent area with adequate nutrition." (Pl227-1228 FEIS).

The FEIS also states that 40,283 acres of these more than 0.5 mile from motorized travel and 63 miles of motorized access would need to be rerouted to achieve the 10% (bottom of the objective) in MA3.

Most of the area with the best potential to produce elk habitat (warm moist PVT type and MA3) is l:1-lso the area with most roads. The FEIS analysis indicates that the elk objectives will not be met in MA2 or MA3 over the life of the Plan with the current plan components relative to motorized travel use.

In addition, the analysis on elk nutrition fails to accurately represent effects to elk forage and habitat use. When the elk team developed habitat criteria, the team included a higher percentage, all of which was supposed to be more than 0.5 miles from an open motorized trail. While the FEIS analysis shows the increase of forage in MA3, it fails to identify forage outside of 0.5 miles of a road (usable forage) and thus misrepresents the benefit of management to elk. MA3-DC-WLMU-0 I states 10% -20% of MA3 will provide moderate of high-quality nutritional elk forage. It also states that a portion of this will be more than 0.5 miles from an open motorized trail.

Under MA3-OBJ-WLMU-0I, the Plan would treat 19,000 acres over 15 years, identifying that treatments are preferentially focused on areas more than 0.5 mile from roads open motorized system routes. The 19,000 acres represents about 1.5% of MA3, and even if all of it were more than 0.5 miles from open motorized activity, the Plan would still fails to meet its objective in 30 years.

The desired condition MA2-DC-WLMU-0l says that 10% to 20% ofMA2 is in a condition that provides moderate or high nutritional quality forage for elk. However, the FEIS analysis indicates that the 10,000-15,000 treatment objective (MA2-OBJ-WLMU-0l) in MA2 is unlikely to achieve the elk objectives over the life of this plan. The ROD says most vegetation objectives in MA2 will be through wildfire and prescribed bums and not commercial timber harvest. The Plan's reliance on treatment via wildfire makes it unlikely that elk forage quality will actually occur on the landscape where the potential elk habitat is high and away from motorized travel.

The Plan does not identify standards or objectives for MA2 and MA3 that will ensure motorized travel management under the Plan supports the preferential focus on elk treatments at greater than the 0.5 mile distance from open motorized routes. Such standards/objectives are important to maintain and restore high elk nutrition habitats under current recreation strategies and are likely to be even more important if implementing the Plan's motorized recreation strategies increases motorized use.

The FEIS's preferred alternative and ROD suggest 55% of the forest as suitable for motorized travel in the summer and 60% as suitable for motorized travel in the winter. The Plan's coarse filter components do not address potential effects from motorized disturbance to elk (as well as other wildlife). As acknowledged in the recreation section, technology in motorized vehicles is increasing (e.g., snow bikes, e-bikes), allowing access to more locations. In addition, with vegetation treatment actions, vegetation is likely to become less of a barrier to motorized travel in MA 3 in general, and motorized access to winter ranges is likely to increase. Additionally, land use changes in the Hoodoo Roadless area that allow over-the-snow travel are likely to increase the challenge of keeping over-the snow travel from disturbing elk in many of the wintering areas on the north-side of the Lochsa River.

Proposed Resolution: Consistent with elk as a focal species in the Plan, the Forest will revise the Plan to reincorporate the suite of plan components previously identified by the elk team, including standards that benefit elk and other species with similar requirements. The Plan will identify standards for motorized travel relative to elk forage in MA3 and MA2. The Plan will state elk objectives quantitatively and include DOE levels that are above ?.2.75 kilocalories per gram as moderate to high quality habitat to support reproducing females. Additionally, the Plan will identify treatment actions that are capable of achieving elk objectives in MA3 and MA2.

After re-analyzing elk habitat with the appropriate nutrition metric (2.75 kilocalories) and 0.5 mile distance from motorized routes, include one or more plan components to achieve the habitat objective. Given the current Plan objective of 530,000 - 645,000 acres of vegetation treatment (per decade) through vegetation management and fire, it is reasonable to increase treatment in MA3 and MA2 to achieve the elk habitat objectives. Depending on the analysis, a potential resolution could revolve around meeting the 2.6 kilocalorie nutrition level in MA2 and MA3, provide more than 0.5 mile from a motorized trail in the first 10-15 years on the Plan, and achieving the 2.75 kilocalorie nutrition level more than .5 mile from a motorized trail in years second 10-15 year period.

The Forest will revise the Plan to include components for security of identified winter range and elk calving areas. The ROS will analyze potential impacts under current and future motorized recreation strategies, and develop fine-scale components to eliminate (or at least reduce and mitigate) those affects. The 2014 Assessment went into detail (including scientific literature) on effects to ungulates when motorized travel occurs in wintering and rearing areas. This FEIS should incorporate the most recent science on this subject to inform the recreation section of the FEIS and Plan.

Examples of previous Comments on Elk
* IDFG Comment: The elk analysis in the FEIS makes clear the components below are insufficient to achieve MA3-DC-WLMU-0J and MA2-DC-WLMUI-0l over the life of the plan.

0 MA3-DC-WLMU-01. Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for Elk. Areas with moderate or high-quality forage are distributed across the management area, with a portion of the moderate or high-quality nutritional forage occurring greater than 0.5 miles from open motorized routes

0 MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk.

0 MA2-DC-WLMU-01. Ten to twenty percent of Management Area 2 is in a condition that provides moderate or high nutritional quality forage for elk. Areas with moderate or high-quality forage are distributed across the management area.

0 MA2-OBJ-WLMU-01. In Management Area 2, I 0,000 to 15,000 acres are improved every five years through vegetative treatments and wildland fire to improve nutritional forage value for elk. Natural ignitions are used to improve nutritional forage when and where appropriate to contribute to these acres.

0 MA3-OBJ-WLMU-01. Improve habitat use for elk on 19,000 acres in Management Area 3 with moderate or high potential nutritional resources within 15 years. Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.

0 FW-GDL-WLMU-02. In order to reduce disturbance to wintering big game, management

activities should be scheduled to minimize disturbance in big game winter range between December 1st and March 15th.

0 MA3-GDL-WLMU-01. To improve vital rates of female elk by increasing predicted percent body fat, treatments designed to improve elk habitat should focus on one or more of the habitat covariates likely to improve predicted cow elk body fat condition while also considering distance from open motorized routes.

*
* FW-DC-WLMU-06. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive plant species or motorized access.
* FW-DC-WLMU-07. Elk habitat is distributed throughout the planning area to support elk populations. Motorized access does not preclude use of high-quality nutritional resources or winter ranges.

* FW-GDL-WLMU-02. In order to reduce disturbance to wintering big game, management activities should be scheduled to minimize disturbance in big game winter range between December 1st and March 15th.

* IDFG Comment: Below [are] the only Plan components related to recreation and motorized travel. These are insufficient to ensure that effects and cumulative effects to elk (as well as other wildlife) are analyzed (and mitigation measures adopted) during projects, travel planning or other analysis on the NPCF.
* MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk.
* MA3-DC-WLMU-01. Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for Elk. Areas with moderate or high-quality forage are distributed across the management area, with a portion of the moderate or high-quality nutritional forage occurring greater than 0.5 miles from open motorized routes
* MA3-OBJ-WLMU-01. Improve habitat use for elk on 19,000 acres in Management Area 3 with moderate or high potential nutritional resources within 15 years. Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.

* IDFG Comment: Below is the only winter range plan component.
* FW-GDL-WLMU-02. In order to reduce disturbance to wintering big game, management activities should be scheduled to minimize disturbance in big game winter range between December 1st and March 15th.

Objection Topic: Fisher

Issue: The Abundance and Diversity of Wildlife section contains a detailed analysis of potential effects to fisher. This analysis highlights concern for fisher viability. Fisher have been petitioned for listing twice (2013 and 2016). The U.S. Fish and Wildlife Service (USFWS) published a 90-day finding that announced there was substantial information that listing of the Northern Rocky Mountain fisher as a distinct population segment may be warranted. However, USFWS' 12-month finding determined the Northern Rocky Mountain fisher was not in danger of extinction and did not need ESA protection. One reason-for this finding was that "distribution and quantity of modeled habitat across the Northern Rocky Mountains appears adequate to support the Northern Rocky Mountain fisher and is resistant to localized fire and drought."

Recent work conducted by IDFG, Montana Fish Wildlife and Parks, in collaboration with the NPCF, indicates that the NPCF contains the largest population core of fisher in the U.S. Northern Rockies (Krohner 2020). All alternatives in the FEIS, which are outside of the NRV, appear to result in reduction of available suitable habitat for fisher. The Plan identifies a desired condition that would appear to reduce available fisher habitat to below the level estimated by USFWS as necessary to support a minimum of 50 female home ranges for genetic health. The reduction in habitat appears to occur relatively quickly in the

first 20 years and only recovers 8% in the next 30 years (estimated 58% reduction in available fisher habitat).

In addition, the FEIS fisher analysis, although detailed, needs improvement in some key areas. In discussions with the Forest on the fisher analysis, IDFG had stated that the 15"-20" dbh category of trees were likely inaccurate for truly providing fisher with mature habitat. IDFG understands that given the limitations for ranges in the USFS databases, using the 15"- 20" category would be a good surrogate.

However, the Forest ultimately used 10" dbh, which overestimates fisher habitat and is not appropriate for this analysis.

The current analysis applying the overestimate (using 10" dbh) still predicts a 58% decline in fisher habitat over the next 50 years. Additionally, ponderosa pine cover type is generally avoided by fisher and it is unclear if the large conversions to ponderosa pine cover types were included in the analysis. Fisher being on the SCC list for the region should warrant some species-specific plan components. As currently structured, one fisher specific desired condition and the Rl meso-carnivore monitoring strategy is insufficient to assess continued persistence and viability of fisher on the Forest. Resolution: The Forest will reanalyze impacts to fisher using 15"-20" dbh, and 20" dbh, and will account for effects from the largescale conversion from grand fir to ponderosa pine on the forest. The FEIS should incorporate the prior version of FW-DC-WL-04 listed below. The Plan should include an alternative that maintains available suitable habitat for a minimum of 50 female home ranges. The Plan will include a component to coordinate with IDFG on a robust monitoring plan and adaptive management for fisher. IDFG and NPCF will cooperatively identify appropriate standard/guideline for inclusion in the Plan to continue to maintain sufficient suitable habitat for the NPCF portion of the core fisher population in the Northern Rockies.

FW-DC-WL-04. The Nez Perce-Clearwater provides the ecological conditions for the long-term persistence of fisher, whose habitat generally follows the distribution of the warm moist potential vegetation type, although fishers sometimes use other potential vegetation (Sauder, 2014; Sauder & Rachlow, 2014).vegetation type, provide a high prevalence of large trees and snags of 20 or greater inches diameter at foraging fisher habitat. Some stands of tall forests, distributed across the warm moist potential as ridge, mid-slope, toe slope, and valley bottom to provide variety in seasonal habitats, denning, and density, and height of forest patches vary by topography, slope, aspect, and topographic position, such natural disturbance (see Warm Moist Potential Vegetation Type). The shapes, sizes, distribution, successional stages resulting from a patchy mosaic of stand heights that occur in patterns that reflects vegetation type section. At the eight square mile home range scale, fishers benefit from variety in forest wide vegetation type consistent with the desired conditions found in Table 6: the warm moist potential extent of approximately 50 percent across the warm moist potential vegetation type group complex with highly connected patterns at the 20- 40 square mile landscape scale. Fisher habitat is composed of large patches of tall forest with trees greater than or equal to 25 meters tall arranged in complex, highly connected patterns at the 20-40 square mile landscape scale. Patches of tall forest cover vegetation type provide a high prevalence of large trees and snags of 20 or greater inches diameter at breast height, abundant coarse woody debris, and multiple denning and resting habitat canopy layers (Sauder, 2014; Sauder & Rachlow, 2014).

Prior Comments on Fisher:
* IDFG Comment: The NPCF should apply a fine-filter approach to fisher-specific Plan components (i.e., standards and guidelines), including implementation of a robust, statistically based, fisher habitat and population monitoring, and adaptive management strategy conducted in concert with proposed forest treatments based on below Forest Service guidance. The State would be interested in working with the NPCF on this exercise.

"The 2012 Planning Rule provides direction to maintain diversity of animal communities and the persistence of native species through a complementary coarse filter approach (FSH 1909.12 23.11 (1)(c)). The coarse filter components ensure that the broad habitat types and characteristics that support many native species are maintained. Fine-filter plan components can be added when additional direction is needed to support a specific species. The plan must provide the ecological conditions to maintain the diversity of plant and animal communities and support the persistence of most native species in the plan area." (FEIS P607)

* IDFG Comment: The minimum DBH for the "large" category of snags is 20 inches. Fishers prefer snags that are 30-50 inches DBH Therefore, some snags that are classified as "large" are not adequate to provide fisher habitat, as noted in the below guidance document:

Reference: FW-DC-FOR-08 - Large Category for Snags and Table 12. Minimum Snags per 100 acres.

* IDFG Comment: Given the NPCF analysis states that pace of restoration will cause larger amounts of habitat fragmentation and the preferred alternative will cause large declines in fisher habitat relatively quickly and persist for decades; the Forest Plan lacks protections for fisher based on the following on page 799-800 of the FEIS:

"Like the total fisher habitat availability model, the Fisher Home Range Habitat Suitability model estimated the current acreage of fisher habitat that is suitable to support home range to be well within the natural range of variation (NRV) at about 970,265 acres (Figure 74). Again, since all the alternatives were subject to the same natural disturbance regimes and had the same desired conditions, the predicted acres of habitat suitable to support a fisher home range differed little among alternatives (Figure 74), although the difference were greater than those for total fisher habitat availability (Figure 68). Like the previous model, the rate of change depended largely on the rate of treatment, with the most intensive vegetation management alternatives resulting in a faster rate of change (Figure 74). Applying the spatial criteria via a moving window analysis to future predictions of fisher habitat suggests an increase in fragmentation in fisher habitat through time." (FEIS p799-800)

"Under the Preferred Alternative, the availability of fisher habitat that is suitable to support a home range drops by nearly 66 percent after the second decade to about 385,339 acres before rebounding and ultimately resulting in a nearly 58 percent decline, to roughly 410,126 acres, by the end of the fifth decade." (FEIS P800)- Reference comparison between FW-DC-WL-04 in the 2019 draft and 2023 Plan language.

Obiection Topic: Bighorn Sheep and Mountain Goats

Issue: IDFG agrees with FW-STD-WL-02 and the Plan's use of the 16 mile-buffer consistent with the Payette Nation Forest decision. Although risk of contact between pack goats and bighorn sheep/mountain goats is lower than risk of other types of contact between bighorn sheep/mountain goats and domestic sheep and goats, the analysis in the Plan's wildlife section documents the seriousness of contact (see also Besser et al, 2017). Mycoplasma ovipneumoniae (MOVI) has been shown to cause all-age die off in both bighorn sheep and mountain goats (e.g., Blancong et. al 2018; Wolff et al. 2019).

The Plan should strengthen measures for disease prevention and control, especially given the ability of this disease to exist in populations for decades and suppress reproduction. The Wilderness Act and implementing regulations identify disease management as an appropriate basis for active management in wilderness, and the Plan should include monitoring and management actions in wilderness and

proposed wilderness to address MOVI and similar diseases with potential for unacceptable losses of wildlife resources. See, e.g., 50 CFR 35.77.

The guideline FW-GDL-WL-04 calling for best practices (BMP's) for pack goats only impacts outfitters and commercial operations when permitting. The Plan and the FEIS do not define what those BMPs are and do not apply them to all pack goat use.

The Plan should also strengthen other measures specific to mountain goat populations. For example, a recent survey of mountain goats in Unit 10-3 (Black Lead/Williams Lake) shows a steep population decline. Mountain goats are a species that live in extremely harsh winter environments and, as such, are often nutritionally deprived during the winter. Winter disturbance is especially problematic for mountain goats. Mountain goats are already stressed by cold and limited food supplies and may exhibit panic, increased metabolic rates and energy expenditure, and reduced time spent feeding due to disturbance (Gordon and Reynolds 2000). Repeated disturbance by helicopters, snow machines, or even logging or road building (Chadwick 1983) may result in abandonment of favored habitats. Mountain goat winter range in the Black Lead includes areas that would be vulnerable to disturbance from over-the-snow travel and heli-skiing. With the Plan's recreational strategy to expand over-the-snow recreational activity, it is important to identify appropriate protections for winter range areas vulnerable to disturbance currently or under future management (elk described previously).

Resolution: The Plan will include a component for coordination with IDFG relative to monitoring and management of MOVI and similar diseases in bighorn sheep and mountain goats, including in wilderness and proposed wilderness.

The Forest will revise the Plan to include provisions to prevent disease transmission (e.g., requirement for pack goats to be tested and MOVI-free) that applies to all pack goat users relative to areas of potential contact with bighorn sheep and mountain goats.

The Forest should develop a mountain goat-specific plan component identifying, in coordination with IDFG, winter range that is not suitable for over-the-snow travel or heli-skiing and adopt a plan component for seasonal closure (e.g., the Plan should include a closure in over-the-snow travel in the Black Lead area of Hoodoo to protect wintering mountain goats).

Prior Comments on Bighorn Sheep Mountain Goats:
* IDFG Comment: "The FEIS indicates the seriousness of contact between bighorn sheep and domestic sheep and goats, but not all potential contact issues have been thoroughly addressed in the FEIS. Reference:
* FW-STD-WL-02 In order to prevent disease transmission between wild sheep and domestic sheep... (excluding pack goats)". IDFG feels that FW-STD-WL-03 only impacts special use permits and not all users and is insufficient.
* FW-STD-WL-03. New authorizations and permit reauthorizations for domestic goat packing shall follow best management practices and include provisions to prevent disease transmission between domestic goats and bighorn sheep

* IDFG Comment: "IDFG is concerned about potential adverse effects to the mountain goat population in the Black Lead area (portion of Hoodoo) from over-the-snow travel proposed in Alternative Y, because mountain goats live in areas with harsh winter conditions and are often nutritionally deprived during winter. Recent surveys in Unit 10-3 (Black Lead/Williams Lake) show a steep mountain goat population decline. Human-caused disturbances that displace mountain goats from important winter areas can cause abandonment of preferred habitats and subsequent population declines (Chadwick 1983, Gordon and Reynolds 2000)."

Objection Topic: Lynx

Issue: The Forest Plan uses outdated lynx habitat modeling that overstates the amount of habitat on the Forest as 1,457,768 acres. Reference maps relied upon (Appendix A) do not apply best available science in identifying "suitable" lynx habitat. The FEIS states (P882 FEIS) that the Olsen model (at al 2021) that refines the amount of habitat on the Forest is under review. In the Olsen model, high habitat probability indicates higher probability of use, particularly by resident individuals, and medium habitat probability indicates potential use by single individuals or animals more likely to be dispersing or moving among territories. The Olsen model indicates that most of the high probability habitat on the Forest is in the upper Lochsa near the Montana border and virtually all of the medium probability habitat fall within wilderness or proposed wilderness.

Since the Olsen model has been available for years, and has been the subject of "best available science" discussions between IDFG and Forest staff, it is unclear why the FEIS lists it as under review and why the Plan does not reflect lower acreage and more limited geographic distribution of lynx habitat on the Forest. Application of the Olsen model better focuses management for the benefit of lynx so that Forest can shift management objectives and actions in areas of habitat less suitable for lynx for the benefit other species (e.g., fisher) and other Forest goals.

Resolution: The Forest will update the lynx analysis and mapping of suitable lynx habitat with the Olsen model to reflect best available science consistent with the ESA. For example, the Forest should not rely on the Appendix A map or other similar information that is out-of-date. Application of the Olsen model should result in reduction the acreage and geographic distribution that the Forest manages as habitat to benefit lynx. The Forest will then be able to retool habitat management actions in those areas of habitat less suitable for lynx so they benefit other species (e.g., fisher) and Forest objectives.

Prior Comments on Lynx:
* IDFG Comment: The Forest should make it clear in their analysis if they have identified or will use a lynx connectivity pathway or if they will continue to maintain that lynx are transient individuals moving through the plan area when analyzing projects. Additionally by adopting the data treating lynx as anything but transient will be more obvious.

Reference: "The areas where Squires et al (2013) mapped lynx connectivity did not include the Nez Perce-Clearwater. Most of the lynx sightings on the Nez Perce-Clearwater appear to be observations of transient individuals, suggesting that lynx move through the plan area." (FEIS page 900)

Objection Topic: Species of Conservation Concern

Issues: IDFG and NPCF have agreed on the importance of addressing the needs of those species of fish, wildlife and botanical resources for which there are legitimate concerns about those species' continued persistence o the NPCF. The 2012 USFS Planning Rule provides explicit direction for including Species of Conservation Concern (SCC) in forest plans. The 2012 Planning Rule states that "Identifying SCC's is necessary for the development of forest plan components (36 CFR 219.7)". A key concept of the 2012 Planning Rule is the coarse-scale and fine-scale approach in regards to SCC. The SCC list was released about the same time as the Forest Plan. The Plan is unclear as to direction for SCCs.

Resolution: The Plan will address the planning rule requirements, providing analysis and plan components to secure these species on the Forest. The Plan and r lated analysis should apply the fine filter approach to species on the SCC list (see above for actions for fisher and bighorn sheep, which are on the SCC list).

Prior Comments on SCCs: IDFG has commented multiple times on the need for the SCC list and compliance Planning Rule requirements.