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Comments: My comments below on the proposed HLC Forest-wide Prescribed Fire Project are relative to the proposed project's impacts on Canada lynx.

Comment 1.

The Biological Evaluation (BE) prepared for this project cites (on pa. 33) some of the conclusions in Holbrook et. al 2019. However, the BE failed to address the authors conclusions regarding the structural forest mosaic of successful reproducing female lynx in their study. EG.. home ranges with abundant mature forest with high horizontal cover (~50%), and intermediate amounts of advanced regeneration (~20%). I have attached a Research Brief that summarizes the most important findings in Holbrook et. al 2019. The home range mosaic recommended in Holbrook et. al (2019) are most important to consider within LAUs on the HLC that are considered "occupied" (as defined in the NRLMD) and/or are within "critical habitat" (as defined by the USFWS). A design feature should be added to Table 3 (in the BA) that insures project treatments that occur within "occupied" and/or "critical" lynx habitat maintain or move toward the desired conditions recommended in Holbrook et. al (2019). If the Forest decides not to incorporate the findings of Holbrook et. al (2019) in project design, then please explain how not doing so meets the Forest's requirements for conserving habitat for lynx.

Comment 2.

Table 19 in the BA does not include information on whether or not Standard VEG S5 would be met.

VEG S5 precludes precommercial thinning (PCT) of young stands in the stand initiation structural stage. If any PCT treatments are proposed, such treatments need to be analyzed and included in Table 19. If any stands in the stand initiation structural stage are to be treated by prescribed fire (as opposed to being treated via mechanical means), then the number of acres that could be treated by burning needs to be disclosed in the effects section of the BA. Although such treatments are not technically precluded in the Forest Plan (NRLMD), these acres provide foraging habitat for lynx and their treatment would result in adverse effects to lynx that need to be disclosed in the BA. Large acreages treated in this manner may impact a FONSI determination, and may lead to a "jeopardy" finding in a Biological Opinion. These facts need consideration and discussion in the EA and BE.

ATTACHMENT: 2020-forest-carnivores-research-brief.pdf