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June 26, 2023

Forest Service

Idaho-Panhandle National Forest

St. Joe Ranger District

RE: Lacy Lemoosh Project

222 South 7<sup>th</sup> Street, Suite 1

St. Maries, Idaho 83861

RE: 60 DAY COMMENTS ON THE PROPOSED CLEARCUTS OVER 40 ACRES FOR THE LACY LEMOOSH PROJECT.

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, Council on Wildlife and Fish, and Center for Biological Diversity would like to submit the following comments as a 60-day response to the proposed openings over 40 acres for the Lacy Lemoose Project. The St. Joe Ranger District is proposing to create 40 clearcut openings over 40 acres in size on 4,050 acres. Some of these openings sizes include 690, 453, 316, 170, 117, 465, 182, 198 and 270 acres. These openings will completely eliminate wildlife habitat for species associated with snags for roughly 100 years, and for those wildlife species that require old growth forests as a part of their life cycle, for up to and over 150 years or more. Yet we could find no analysis in the Idaho Panhandle Forest Plan as to how these large openings will impact wildlife. As such, there is no Forest Plan programmatic, cumulative effects analysis as to how openings over 40 acres in size will impact

wildlife, in violation of the National Environmental Policy Act (NEPA) as well as the National Forest Management Act (NFMA). In fact, there is no analysis in the Forest Plan FEIS as to how any clearcut, regardless of size, affects wildlife. A Forest Plan is required to include habitat management direction for wildlife in order to maintain a diversity of wildlife. With no limits on the acreage of forest habitat that can be clearcut within any given area of the forest, the Forest Plan cannot ensure that this diversity of wildlife will be maintained within any given landscape of the forest. The Idaho Panhandle National Forest must complete a Forest Plan amendment in order to meet the requirements of analyses of how clearcuts of any size will impact wildlife. This amendment also needs to provide valid, ecologically-effective habitat standards for wildlife. These standards need to that will set measurable "sideboards" on the amount of any given landscape that can be clearcut and thus lack habitat for most wildlife species. Various examples as to why these sideboards on the size and percentage of the landscape, including all clearcuts, need to be provided in order to maintain wildlife diversity on the Idaho Panhandle Forest Plan is provided below.

## **Old Growth Forests**

There are an estimated 30 or more wildlife species associated with old growth forests in the Northern Rockies (USDA 1990 by Warren; USDA 2018). The current best science recommends from 20-25% old growth forest for various old growth species, including 20% for the Northern Goshawk (Reynolds et al. 1992), 25% for the Pileated Woodpecker (Bull and Holtausen 1993), and 20-25% for forest birds (Montana Partners in Flight 2000). This level of old growth recommended for wildlife is at the low range of estimated historical levels of 20-50% in the Northern Rockies (Lesica 1996). As noted by a Region 1 report, this old growth should be distributed at least every 10,000 acres, or within every watershed (USDA 1990 by Warren). It also should be distributed within individual territories, including every 6,000 acres for the Northern Goshawk (Reynolds et al. 1992) and every 1,000 acres for the Pileated Woodpecker (Bull and Holthausen 1993). The Idaho-Panhandle Forest Plan states that when the Plan was completed, there was approximately 12% old growth on the Forest, or less than half of 25% of

recommended levels (Partners in Flight 2000). This is the level of old growth reported by Bush et al. (2006) almost 20 years ago. The current level of old growth may be considerably lower. The Lacy Lemoosh Scoping Notice states that there are only 400 acres of old growth in the 16,116 acres of the project area, which is only 2.4%. Currently, this project area exists as a severe adverse impact on old growth associated wildlife as a result. In order to provide the recommended 25% old growth for wildlife, this project area should actually contain 4,029 acres of old growth and 40,029 acres of replacement old growth.

The clearcutting of 4,400 acres of forest, or 27% of the existing forest, likely includes many acres of old growth or recruitment old growth. Past logging has already eliminated up to 20% of existing or recruitment old growth. Restoration of 20-25% old growth is an essential biological need for this landscape in order to meet the requirements of the NFMA. This project is a clear violation of the NFMA because the proposed clearcutting will exacerbate an existing situation as per a lack of wildlife diversity, including species associated with old growth forests. It is a violation of the NEPA because the Forest Plan FEIS does not disclose to the public how this programmatic practice will prevent the agency from maintaining a diversity of wildlife. A Forest Plan amendment is required to obtain public involvement on clearcutting, and for the agency to provide an analysis of how clearcutting, including clearcuts over 40 acres in size, can maintain wildlife diversity, including wildlife associated with old growth forests. The Lacy Lemoosh Project as planned with clearcutting will create irretrievable losses of wildlife diversity, in violation of the NFMA and the NEPA.

Without proper planning for old growth and recruitment old growth, associated species will not have habitat maintained. For example, the Great Gray Owl is an Idaho Species of Greatest Conservation Need (Idaho Department of Fish & Game 2022). The Targhee National Forest Revised Forest Plan (RFP) identified a standard to allow no harvest within 20 acres of Great Gray Owl nest sites, and to maintain over 40% of the forested acres in late seral age classes within a 1,600 acre area around all known nest sites. This RFP also has a standard for the Boreal Owl, an old-growth associated species, to allow no timber harvest within a 30-

acre area around known nest sites, and to maintain over 40% of the forested area as late seral age classes within a 3,600 acre area around all known nests. For the Flammulated Owl, a sensitive species on the Idaho Panhandle National Forest, that RFP has a standard to prohibit any logging within a 20-acre area surrounding nest sites. For the Northern Goshawk, a Priority Species on the Idaho Panhandle National Forest, this RFP has standards and guidelines for protection of nest areas, postfledging areas, and foraging areas, with each area having old growth requirements (100% for nesting areas and at least 20% for postfledging and foraging habitat). The Idaho Panhandle Forest Plan does not require any planning for old growth for any of these associated species. This lack of planning is evident in the proposed Lacy Lemoosh Project. The clearcuts (4,400 acres) have been laid out without any identification of forest raptors, or without any identification of retention old growth forests for these forest raptors. Surveys for these species require extensive amounts of time and expertise. It appears that they have not been done. The agency also cannot guarantee that valid surveys, with a reasonable probability of detection, will be done. This means that the forest's clearcutting program is and will continue to create severe adverse impacts on forest raptors, due to a lack of actual surveys. This impact has not been identified or evaluated in this forest's Forest Plan. Nor has this severe impact ever been disclosed to the public. The impacts of clearcutting on Idaho's Great Gray Owl, a species identified as a species of greatest conservation need (Idaho Department of Fish and Game 2022) could easily impact more than one pair of nesting owls, as this forest owl tends to nest in loose colonies across a larger landscape (Bull and Henjum 1990; Bull et al. 1988); impacts on one nesting Great Gray Owl may affect a number of other nesting pairs. Worse, the Idaho Panhandle Forest Plan does not actually require that any habitat be maintained for these sensitive forest raptors. Instead, the only protection is to avoid disturbances in the nesting area, should surveys ever be done.

There are also a number of other forest raptors, birds that will be highly sensitive to logging during their nesting season, that could be occupying proposed clearcut areas. These include the Northern Pygmy Owl, Northern Saw-whet Owl, Northern Hawk Owl, Cooper's Hawk and Sharp-shinned Hawk. The project map provided for the Lacy Lemoosh Project does not identify any nesting site locations for these

forest raptors as well. If the planned clearcutting is to proceed without any valid surveys for these forest raptors, clearcutting will create severe impacts to these forest raptors during their nesting season. Worse, their habitat can be completely removed with clearcutting, as there are no habitat standards for any of these forest raptors. At a forest-wide level, these impacts would be highly severe. Since the Idaho Panhandle Forest Plan does not require surveys for these species in proposed clearcut areas, this clearcutting program cannot maintain a diversity of wildlife, including many forest raptors.

## **Forested Snag Habitat**

The requirement of snags for wildlife includes up to 40 bird species and 10 mammal species (USDA 2018). For birds, they represent roughly 25% of all forest birds (Bull et al. 1997). A recent article on wildlife dependent upon snags in Montana Outdoors noted that in Montana, more than 60 species of wildlife use dead trees or logs for feeding, nesting, roosting, resting, denning and drumming (Horowitz 2023). This report noted that dead trees in a forest are equally, or possibly more important to wildlife than green trees in a forest, likely because in general dead trees are quite limited over time. Yet the Idaho Panhandle National Forest has no valid conservation strategy for snags. The strategy is outdated by roughly 25-30 years, as reported back in 1989 (Goggans et al. 1989) and in 1997 by a Forest Service research report (Bull et al. 1997). Snag management direction includes only leaving a few snags in harvest units. These reports clearly note that forest birds require more than a snag; they also require foraging habitat, thermal cover, and hiding cover. This is why the Three-toed Woodpecker has been reported to nest in forest stands containing over 70 larger snags per acre on the Helena-Lewis and Clark National Forest in Region 1 (Saab et al. 2012), as snags provided foraging habitat within a forested habitat. Snag management recommendations for the Black-backed Woodpecker, a sensitive species on the Idaho Panhandle National Forest, call for providing undisturbed tracts of natural forests up to 1,000 acres (Goggans et al. 1989). Habitat management recommendations for the Pileated Woodpecker include no clearcutting within a 1,000 acre territory, so that some snags are always present in their habitat (Bull

and Holthausen 1993). This is far different from leaving a few snags in harvest units. The use of an invalid snag strategy for wildlife in the Idaho Panhandle Forest Plan is a deliberate violation of both the NEPA and the NFMA. During development of the current Forest Plan on the Idaho-Panhandle National Forest, there was never any analysis or documentation that past snag management direction (leaving a few snags in harvest units) was maintaining a diversity of wildlife. At this time, a Forest Plan amendment is in order so that the Forest Service can finally implement a valid conservation strategy for the large number of wildlife species that depend upon forested snags and logs for viability.

A Forest Plan amendment to develop valid standards for the roughly 40 bird species and 10 mammal species that use snags as a part of their habitat (USDA 2018). This amendment needs to define specifically how clearcutting represents a valid wildlife management strategy for snags, given that clearcuts will eliminate snag habitat for all these species for roughly 100 years. At that age, forests will likely begin to develop trees over 10 inches in dbh, which is the noted minimum size of snags important to wildlife (Bull et al. 1997). As an example of identifying the impact of clearcutting on wildlife, the Lacy Lemoosh Project proposed to clearcut 4,400 acres. This would result in a habitat impact (loss) for wildlife of 17,600 acres of forested snag habitat, with an average "estimate" of 4 larger snags per acre. Over a 100 years, this comes to approximately 1,760,000 snags lost for wildlife. When measured for the entire period of a Forest Plan, the snag loss to wildlife from clearcutting would be massive, with associated losses of wildlife as well. The claimed mitigation measures for all these wildlife species that use snags in the Idaho Panhandle Forest Plan is not only invalid because a snag is not habitat for most wildlife unless it occurs in a forest, but because any snag left in clearcuts will at best remain standing for 20 years (Bull et al. 1997). And any snag left in clearcuts also has only about a 4% chance of being a suitable cavity tree (Vizcarra 2017). If 4 snags per acre are left in clearcuts, only 0.16 of these snags will likely provide a suitable cavity tree for species that will nest in clearcuts, and by 20 years, there will be zero snags for wildlife. Between this problem, along with snags quickly blowing over in clearcuts, the Idaho Panhandle National Forest clearly has no valid intent to maintain wildlife diversity in clearcut areas.

## Forest Mammals

The proposed clearcutting, including one over a square mile in size, will result in 4,400 acres of clearcutting in the 16,116 acre project area. This will create clearcuts on 27% of the landscape. The current best science for the fisher notes that their habitat should contain no more than 5% clearcuts, in order to maintain habitat use by this species (Sauder and Rachlow 2014). The current best science for conservation of the Canada lynx (hereafter "lynx") is to have no more than 5% of the landscape in openings as well (Holbrook et al. 2019). Recommendations for management of the pine marten include limiting clearcutting to no more than 25% of a pine marten territory, which would generally be about 2,000 acres (Hargis et al. (1999). Clearcutting removes habitat for all these forest carnivores, including removing habitat for a key prey species for these carnivores, the snowshoe hare (Id). The larger size for a snowshoe hare territory is roughly 25 acres (Griffin 2004). Clearcutting 4,400 acres of snowshoe hare habitat will directly eliminate 176 territories for snowshoe hares. Given that it will take approximately 20 or more years for their habitat to be restored, this will create a cumulative impact of 3,520 acres of habitat loss for this key prey species, or over 20% of the Lacy Lemoose Project Area. This would be tantamount to reducing forest carnivores that prey on snowshoe hares by 20% for the next 20 years in this landscape.

The proposed clearcutting of 4,400 acres of forest carnivore habitat, and their prey's habitat, will also severely impact the ability of these forest carnivores to use the impacted landscape in order to locate suitable foraging habitat. As was noted by Squires et al. (2010), the lynx avoids crossing openings in the winter, with the average crossing distance being 383 feet. With massive clearcuts creating winter movement barriers at a time when survival for forest carnivores is most critical, the Lacy Lemoose Project will clearly create significant impacts on the ability of the lynx to use this landscape as successful breeding habitat. Suitable habitat will be so fragmented by travel barriers that it could become

essentially unavailable for lynx. This avoidance of clearcuts by lynx may last up to or over 40 years (Holbrook et al. 2018).

Clearcutting 27% of the Lacy Lemoose landscape will also create severe travel barriers for the Pine Marten. This species is noted to avoid logging impacts, including clearcuts (Moriarty et al. 2016; Kirkland 2016). These reports noted that impacts of forest thinning and clearcutting on Pine Marten may result in the landscape losing its ability to maintain habitat for this mammal; impacts other than travel barriers may include high exposure to predation. This habitat fragmentation with logging was noted to result in expansions of home ranges of Pine Marten in Montana (Fager 2003). Clearcutting will also eliminate essential winter habitat for the Pine Marten for possibly 80 years, until the forest regrows and matures to where insect epidemics create abundant jack-strawed logs essential for Pine Marten winter habitat (Sherburne and Bissonette 1994).

Forest squirrels are severely impacted by clearcutting. Northern Flying Squirrels are entirely dependent upon trees as a means of movement, and clearcuts create movement barriers for 20-35 years; because conservation requires that mating, dispersal and immigration processes continue unimpeded, barriers created by open space back flaying squirrels up against the wall (Duncan 2003). The ability of the Northern Flying Squirrel to glide is only 98 feet, so gliding across wide clearcuts is impossible (Smith et al. 2013). Fragmentation of forests that removes habitat for Northern Flying Squirrels may also create habitat patches that are too small (540 acres or less) to maintain genetic diversity (Duncan 2003). Smith et al. (2013) noted that gaps created in Northern Flying Squirrel habitat by clearcuts are predicted to influence population viability due to the restriction of movement across non-habitat matrix or gaps, which may lower dispersal, restrict immigration, limit potential foraging area, increase competition in isolated patches, and increase predation rates. Clearcutting will also have severe adverse impacts on the Red Squirrel, not just by directly removing forested habitat that produces the conifer seeds they depend upon, but because the forest gaps created by clearcutting are avoided by this squirrel, which fragments and thus

reduces squirrel access to remaining suitable forest habitat (Bakker and Van Vuren 2003).

Clearcutting also has severe impacts on the Red-backed Vole, an important prey species for many forest predators. Mills (1995) noted that this species was virtually isolated in forest remnants, making little use of regenerating clearcuts surrounding the remnants (fence effect); the effect of clearcutting also impinged on the remnants as edge effects; 6 times more voles were captured per trap in the interior of fragments than on the edge; the density of voles increased with remnant size. The fragmentation effects of clearcutting are related to their size. Gillis and Nams (1998) reported that a distance of 200-230 feet in an opening is likely to completely isolate Red-backed Voles from adjacent habitat. So the impact of clearcuts wider than roughly 100 feet (Smith et al. 2013) is similar in impact of clearcuts to Red-backed Voles when they exceed several hundred feet in width.

## **Forest Birds**

Declines of North American landbirds have been significant since the 1970s, with a loss of over 3 billion birds; of the 67 species of western forest birds, 64% are currently in decline (Rosenberg et al. 2019). This ongoing crisis in North American bird fauna includes many factors, such as habitat loss. The ongoing clearcutting of western conifer forests is one example of this habitat loss. The planned clearcutting of 4,400 acres, or 27% of the project area, will directly remove habitat for almost all western forest birds for 20-150 years. The Idaho Panhandle Forest Plan FEIS does not address how clearcutting will affect populations of forest birds. Any and all clearcutting is thus outside of the NEPA analysis for this Forest Plan, in violation of the NEPA and NFMA. Until this violation is corrected with a forest plan amendment, any clearcutting, including in the Lacy Lemoose Project Area, cannot legally proceed. The direct, indirect, and cumulative impact of clearcutting on the Idaho Panhandle National Forest must be evaluated as per the requirements of the agency to maintain a diversity of wildlife, as well as to provide high quality information to the public on effects of agency management.

There is a massive body of science that addresses the severe effects of clearcutting on forest birds, science that is far too vast to be addressed in these comments. The fact that none of this science was used in the FEIS of the Idaho Panhandle Forest Plan FEIS is in itself a violation of the NEPA. The fact that the agency proceeded to use clearcutting as a standard logging practice without evaluating impacts to wildlife is a violation of the NEPA and NFMA as well. This flaw of the Forest Plan FEIS needs to be addressed before the agency continues any further clearcutting. The following are just a few examples of the science on adverse clearcutting impacts on forest birds.

The Pileated Woodpecker has been identified as a “keystone species” by creating nesting cavities for a host of other birds, including forest owls (Horowitz 2023). Clearcutting completely removes habitat for this forest species, and clearcutting is not recommended within Pileated Woodpecker habitat (Bull and Holthausen 1993). In fact, clearcutting has been identified as the major contributing factor for a significant decline of the Pileated Woodpecker in Oregon (Bull et al. 2007).

Clearcutting also reduces habitat for the Northern Goshawk. Clearcuts over 4 acres in size are not considered Northern Goshawk habitat (Reynolds et al. 1992). Clearcutting removes 2 important prey species for this raptor, including snowshoe hares and red squirrels (Clough 2000). In that research project in Montana, productivity of goshawk nests was lower when the percentage of clearcuts surrounding the nest increased. In Arizona, it has been found that as clearcutting progressively increases the amount of openings in a landscape, habitat is progressively converted from goshawk to red-tailed hawk habitat (La Sorte et al. 2004). This may be an effect of clearcutting 27% of the Lacy Lemmoose Project Area; goshawks may be replaced by red-tailed hawks.

Clearcutting increases the impacts of predation and brood parasitism on forest birds that breed in adjacent forest fragments. Examples of increased predation include the use of edges for hunting by the nest predator the Gray Jay (Ibarzabal and Desrochers 2004). Forest openings also increase use of the landscape by the

Brown-headed Cowbird, which can create significant reductions in productivity of forest birds due to nest parasitism (Robinson et al. 1992). This research article recommended that management of forest birds needs to provide large, unfragmented tracts of forest habitat of thousands of acres in size to reduce habitat use by cowbirds. The proposed clearcutting of 27% of the Lacy Lemoose Project Area is a direct contradiction to this current science for management of forest birds.

Clearcutting also creates gaps in forest habitat that impedes movement of forest birds. Desrochers and Hannon (1997) reported on the effects of forest openings on bird movements, including the following: woodland links significantly facilitate movements of birds across fragmented landscapes; overall, birds were twice as likely to travel through 164 feet of forest than through 164 feet of openings; fragmented landscapes reduce the ability of birds to move across inhospitable habitat; gaps less than about 100 feet had a much lower effect on bird movements across them than gaps over 300 feet; moving individuals will take significant detours to avoid crossing open areas; songbirds are extremely vulnerable to predation by forest raptors when crossing openings; maintaining connections among forest fragments to facilitate dispersal may be important in the persistence of forest bird populations.

Rail et al. (1997) also studied the effects of forest gaps on forest birds; they noted that the probability of birds crossing gaps decreased sharply with gaps 82-130 feet wide; these results demonstrated that gap crossing by territorial forest birds was strongly affected by relatively narrow gaps (less than 130 feet); this distance was identified as a "critical gap width" for studied birds. This article also noted other facts regarding habitat fragmentation, including that previous studies on forest-interior bird species reported decreased densities near treeless corridors between 26-75 feet in width, and minimal use and edge avoidance of large gaps; distinct edges function as natural territorial boundaries for many forest birds.

Another severe impact of clearcutting on forest birds is that the sizes of remaining forest tracts is unavoidably reduced. As was noted previously, the size of forest tracts affects the presence of Brown-headed Cowbirds on the landscape, with use reduced as forest tract size increases (Robinson et al. 1992). Burke and Nol (2000) reported extensively on how the size of forest tracts affects occupancy and productivity of forest birds, including: several species in smaller forest tracts had replacement levels below that required for population persistence; nest predation was a significant factor in loss of nests, but brood parasitism by the Brown-headed Cowbird also was a factor; higher brood parasitism occurred within 327 feet of forest edges; some species had significantly lower reproductive success in smaller versus larger tracts; fragmentation can increase woodlot isolation which would reduce immigration rates; food is probably limiting in small forest fragments; nest success was significantly higher in forest tracts at least 1,250 acres in size; this was the minimum patch size of forests recommended for this boreal forest landscape in Ontario; continued loss of larger forest tracts is likely to jeopardize local songbird populations in Ontario. Their study demonstrates support for the conservation of forest nesting migrant songbirds by identifying, preserving and restoring large tracts of forest which will function as population sources and safe guard against collapse of local populations; forests less than 1,250 acres likely represent habitat sinks.

In conclusion, available science clearly demonstrates that the conservation of forest songbirds, woodpeckers and raptors requires the provision and protection of large tracts of undisturbed older forest habitat to avoid local population declines and/or collapse. The Lacy Lemmoose Project, with a proposed clearcutting of 4,400 acres, or 27% of the affected landscape, is exactly the opposite that is required by the NFMA to maintain a diversity of wildlife. Until the Idaho Panhandle Forest amends their Forest Plan to include valid conservation standards for forest birds, from species associated with old growth to forested snag habitat to large tracts of undisturbed forests, the agency is in violation of the NFMA as well as the 2012 planning rule, as clearcutting will not maintain habitat for any Idaho at-risk bird species.

## Big Game

The current level of big game security in the Lacy Lemoose Project Area is unknown. However, it will be severely reduced with the proposed clearcutting of 4,400 acres, or 27% of the project area. The scientific definition of elk security is based on 2 recommendations, the Hillis Paradigm developed by elk researchers/experts in the Northern Rockies (Hillis et al. 1991), and the actual measure of elk use during the hunting season in the Elkhorn Mountains of Montana published by Lowrey et al. (2020). Both reports require that elk security is defined by a minimum of 250 acres of contiguous forest cover. However, Hillis et al. (1991) defines cover by the standard definition of concealing 90% of an elk within 200 feet, or cover provided "within" a stand of timber. Lowrey et al. (2020) uses canopy cover as a proxy for hiding cover because this could be measured across large landscapes; they measured elk fall use by levels of canopy cover, and found that elk use increased with higher canopy cover (preferred security). Regardless, both criteria for elk security require hiding cover, whether it is within stand cover or canopy cover. This means that elk security cannot be maintained within clearcuts. The more extensive and increased size of clearcuts means that remaining forest fragments of a minimum size for security, at least 250 acres will be harder and harder to provide on a landscape. The minimum recommended level of elk security is 30% (Hillis et al. 1991, Christensen et al. 1993). In addition to reducing forest fragment sizes with clearcutting, the acreage of these fragments that remain at least 0.5 miles of an active motorized route as per Hillis et al. (1991) or from 1.3 to 2 miles away from an active motorized route as per Lowrey et al. (2020) will decline.

The Idaho Panhandle Forest Plan FEIS indicates that elk security requires hiding cover, and a 30% security is identified as an objective. Thus this FEIS is consistent with past recommendations and current science on elk security. The Lacy Lemoose scoping notice indicates that there are 2,000 acres of elk security in the project area, although these are not mapped. This would be 12.4% security, or less than half the recommended level. With clearcutting of 4,400 acres of forest, the planned level of elk security will be far below 12.4%. The proposed

clearcutting for the Lacy Lemoose Project will require a violation of the Forest Plan Guideline 13, where security should be maintained. This is the only wildlife habitat direction in the forest plan that limits the amount of clearcutting that can occur within a given landscape. The agency needs to provide a valid assessment of security, or areas of contiguous forest cover, as how it will be impacted by clearcutting 4,400 acres in the Lacy Lemoose Project area. If clearcutting results in violation of the forest plan guidelines 13, and/or failure to increase security to the objective of 30%, this requires complete disclosure in the agency's analysis of clearcutting impacts on wildlife. This also requires at least a site-specific Forest Plan amendment. If there are conflicting guidelines/objectives in the forest plan, such as for wildlife (elk security) and fuels reduction, there clearly is a need to amend the forest plan to resolve this conflict, including as demonstrated in the Lacy Lemoose Project.

**Attachments:** These comments include Appendix A, which has relevant portions of reports and/or publications cited in these 60 day comments.

Regards,

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