



To: Project Manager
Northern Rockies Lynx Amendment
FS Region 1
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Comments on Northern Rockies Lynx Amendment DEIS from Flathead Audubon Society

On behalf of the Conservation Committee and the Board of Flathead Audubon, I am writing to express my concerns with the proposed Northern Rockies Lynx Amendment.

Overall, the Amendment appears to significantly reduce the standards applied to lynx management as found in the Lynx Conservation Assessment and Strategy (LCAS), the Biological Opinion (BO) for the LCAS, and Conservation Agreement. Also, the Amendment provides a very weak biological basis for weakening the standards in the LCAS.

The basis for changing many of the standards in LCAS to guidelines in the Amendment is based on the July 2003, FWS Remanded Determination of Status. However, the Remanded Determination of Status says that the reason that timber management and fire suppression activities (specifically, pg 40092-40093) have a "low" threat to lynx is because the FS and BLM are using the LCAS, BO, and Conservation Agreement to conserve lynx. This line of reasoning appears throughout the Analysis of Factors in the Remanded Determination of Status. Therefore, the Amendment appears to incorrectly use the Remanded Determination of Status as a reason to reduce the standards for lynx management in timber and fire.

Chapter 3 in the Amendment DEIS discloses the value of multi-storied stands for snowshoe hare foraging habitat, but Alt E seriously weakens management direction in such stands.

Chapter 3 in the Amendment DEIS discloses that fuel treatments could further increase the amount of unsuitable habitat beyond the 30% limit, but no restrictions apply to fuel treatments in Alt E.

The FWS's 2003 Remanded Determination of Status acknowledges that the LCAS was developed to provide a consistent and effective approach to conserve lynx and lynx habitat on Federal lands across its range in the contiguous United States (pg 40092). Under Factor D (pg 40096) there is a lengthy discussion of the LCAS and how it is the reason for alleviation of effects of management activities on federal lands. Yet, the Amendment seriously reduces the mandatory direction contained in the LCAS.

In the Amendment, the line of reasoning applied to the issues of snow compaction and competition is unclear. The Amendment appears to base the relaxation of LCAS standards on some statements in the Remanded Determination of Status. However, reading the Remanded Determination of Status reveals that 1) the FWS still relies on the application of the LCAS on Federal Lands to conserve lynx, and 2) the “lack of evidence” referred to is not explained.

In the Remanded Determination of Status, nearly all of the information available since the LCAS is the “preliminary results” of various research projects currently ongoing. It seems risky and unprofessional to base substantial change in lynx direction in the Amendment (i.e. significantly reducing the standards in the LCAS) on preliminary research findings.

The Remanded Determination of Status focused on population level effects and the FWS determined that all lynx in the US were included in one population. At that scale, or even at their geographic divisions, it would be hard to conclude that many activities had other than low impacts. However, the Forest Service manages at a much smaller scale and it is not hard to imagine a much higher potential for impacts to individuals. The Forest Service has no acceptable way of assessing population effects over large scales. Assessing impacts at the LAU level remains the most logical for activities on National Forests. Implementation of Alt E in the DEIS would seriously reduce the management and conservation efforts directed at lynx on the National Forests.

Throughout the Amendment, it is often stated that, although not mandatory, the guidelines will usually be applied and result in lynx conservation. I feel strongly that it is misleading to imply that the guidelines will be implemented to a level that will benefit lynx conservation. In my 30+ years with the Forest Service, it was my experience that unless something was mandatory it was seldom implemented especially when it came to wildlife related issues.

In summary, Alternative E in the DEIS for the Northern Rockies Lynx Amendment would seriously reduce the management and conservation efforts for lynx on National Forests and no compelling biological reasons are articulated that reducing the standards in the LCAS is justified to conserve lynx.

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Conservation Committee Chair