appearances, the treatments will have severe adverse impacts on lynx, rather than will be beneficial. Also, the DEIS at 395 claims that partial harvest and burning will improve non-winter hare habitat. The basis for this claim was never provided. It is not clear why forest thinning and removal of most of the understory will improve hare summer habitat, since cover will be removed. No scientific reports to demonstrate that this type of harvest has increased hare numbers in Montana were cited.

The DEIS at 380 acknowledges that logging and burning will reduce red squirrel habitat, a potentially important alternate prey species for lynx.

H-continued

The agency claims they are following the NRLMD, yet this is not actually correct. The requirement that no more than 30% of an LAU be in an unsuitable condition at any given time cannot be met due to the Snow Talon Fire. This is a Forest Plan violation. LAU B-08 currently has 36.7% unsuitable lynx habitat. The agency is violating the NEPA as well by claiming the NRLMD standard for no more than 30% habitat unsuitable is currently being met in the Project Area.

The NRLMD does not provide a NEPA assessment of project impacts on lynx. For example, 15% of a LAU could be clearcut at any given time. For LAU B-07, there is only 331 acres of unsuitable habitat at present. Alternate 3 would create at least 582 acres of additional unsuitable habitat (regenerated). The total lynx habitat in this LAU is 17,632 acres. 15% of this equates to 2644 acres. Thus a total of 2644 acres, minus the existing 331 acres, could be clearcut within the next 10 years. The Stonewall Project will not come close to reaching this allowed habitat loss. This clearly demonstrates that the function of the NRLMD is to allow considerable habitat loss in lynx habitat, even though lynx population declines may result.

The DEIS did not define the number of total acres that are allowed on the Helena National Forest as per the 6% exemption provided for in the NRLMD.

12. Old Growth Management

A-Logging and Burning Old Growth

There is no information provided on how much old growth, as per the Region 1 old growth types defined in Green et al. 1991, that occur in the Project Area. Also, it is not clear how much old growth has been previously logged. This information is important, as 3 of the Forest's MIS require

considerable levels of old growth. The pine marten should have 20% old growth, the goshawk should have 20% old growth, and the pileated woodpecker should have 20-25% old growth. Also, forest songbirds should have 20-25% old growth. You cannot not address viability of this suite of species if the old growth management program is not defined. You can ensure that you are meeting the diversity requirements of the NFMA without this type of analysis. Meeting the Forest Plan standard of 5% "designated" old growth does not meet the NEPA requirements to address the needs of old growth-associated species. This 5% does not even define actual old growth.

In regards to old growth, it is also important to demonstrate that recruitment old growth is also being provided. Replacement old growth cannot be provided if older and mid-seral stands are degraded with logging and burning.

B-logging old growth

The DEIS claims that logging old growth will not affect its value to wildlife. No citations were provided to support this claim. The current best science indicates that logging will degrade values for the goshawk, fisher, pine marten, lynx, and many forest songbirds.

C-map old growth

Existing old growth stands should be mapped as well. Also, their location to proposed and past treatment units would provide valuable information to the public, especially dealing with fragmentation. Many wildlife species require minimum sizes of old growth, and small patches of old growth would not meet their needs.

D-burn in old growth

It is not clear why the agency would burn old growth forests. This is ecosystem destruction, and appears to be based on a jobs program for the agency, not ecosystem management.

13. Forest Plan Monitoring of MIS Populations

The DEIS failed to provide any monitoring data for MIS population trends, or habitat availability on the Helena National Forest. This information is especially important for the Stonewall Project, as habitat for MIS pine marten, goshawk, pileated woodpecker and the hairy woodpecker will all be reduced with the Project. Given that habitat losses are planned, the agency needs to demonstrate that population viability is still being maintained, not just for the project area, but cumulatively across the Forest. This would not be so critical is habitat for these species was not being reduced by agency

management activities. Also, for these MIS, the DEIS failed to define how diversity will be maintained as per ensuring viability of these various MIS. There is not current biologically-effective conservation strategy in the Helena Forest Plan for any of the 4 MIS, goshawk, pileated woodpecker, pine marten and hairy woodpecker. As noted previously, the 5% old growth standard for the Forest Plan is far below what management recommendations for 3 of these 4 species defines (20-25%). The Forest Plan is not currently capable of ensuring viability of any of these MIS.

13. Pine Marten

A-Habitat Monitoring

B-Old Growth Management

C-Treatments effects

The DEIS failed to provide any population or habitat monitoring for the pine marten. The 5% old growth standard for the pine marten in the Forest Plan is insufficient, as 20% is needed as per the current best science. In addition, the DEIS at 444 notes that 60% of a landscape should provide mature forest habitat for the pine marten. There was no analysis as to how the proposed old growth management will ensure viability of this MIS. AS per the DEIS at 302, only 35% of the Project Area has trees over 10 inches dbh, so habitat currently is limited. This may actually be lower, since it is unlikely that all these forests have canopies over 40%. With treatment on up to almost 3,000 acres of pine marten habitat with both logging and burning, habitat would be reduced down to only about 6,000 acres, or 28% of the landscape. The agency did not indicate whether this was enough habitat to allow persistence of marten, since it would be far below the 60% composition of mature forest indicated as necessary for this MIS.

The DEIS claims that partial harvests will maintain pine marten habitat. The canopy cover for treated areas was never provided, however. In addition, the DEIS at 301 and 444 notes that marten like closed canopy forests. No Forest Plan monitoring was provided to indicate how marten respond to partial logging on the Helena National Forest. No science was cited indicating marten are not harmed by partial logging. It was noted that regeneration harvest removes marten habitat, which is correct.

The fragmentation impacts of logging and burning were not evaluated in the DEIS. Pine marten avoid crossing openings, especially in the winter. The Project will result in extensive fragmentation of marten habitat, and will add to fragmentation impacts of past logging. The level of fragmentation that pine marten can tolerate in their habitat was not identified. It is unknown if 60% mature forest with closed canopies currently exists, or will continue to

exist, after Project implementation. There is no evidence that the agency is attempting to maintain pine marten populations in this landscape, or elsewhere on the Forest.

14. Pileated Woodpecker

A-Existing level of Habitat

It is not clear how much total habitat is available for pileated woodpeckers in the Project Area. Pileated woodpecker habitat is not even defined as per characteristics. This lack of information results in a flawed analysis, since the impacts of the project cannot be accurately defined. For example, the pileated woodpecker generally likes habitat with dense canopies and multiple canopy layers, and a large abundance of large logs and snags. All these features will be removed with treatment, including burning. The DEIS at 439 indicates that 16% of pileated woodpecker habitat will be removed, with a total potential 3,570 acres affected. The existing level of pileated woodpecker habitat is not provided, and could not be estimated due to the erratic information provided on habitat effects. This information needs to be provided to the public. Also, the adequacy of existing habitat needs to be addressed, as well as how proposed reductions will affect habitat availability. As one example, the DEIS does not address how old growth habitat levels are meeting recommended levels for this species.

The Forest Plan standard for old growth is inadequate to ensure persistence of this woodpecker, as is the Forest Plan snag standard. This standard addresses snags in harvest units, or areas where the pileated woodpecker generally avoids for nesting.

Overall, it is not clear if even existing habitat for the pileated woodpecker is adequate in the Project Area. The agency has no data on Forest population trends of this species even though they are proposing to further reduce habitat in the Stonewall Project. This depletion of MIS habitat requires a Forest-wide analysis of cumulative effects, since the agency is demonstrating that management activities are not preserving habitat for this woodpecker in sight-specific projects. If this is happening across the Forest, then this species may be losing viability.

15. Goshawk

The DEIS failed to evaluate goshawk habitat by the current best science. Habitat analysis for wildlife typically includes the full range of age and size

classes, including for the goshawk as per the southwest guidelines. This was not done for the Project, and it is impossible to determine the status of goshawk habitat in this landscape by forest age and canopy density class. The Region 1 definitions of goshawk habitat cannot be compared to the southwest guidelines, so the latter information should also be provided. This information is available through Region 1 VMap methodology.

A-Foraging Habitat

The DEIS should simply define goshawk foraging habitat, as the use of both foraging and nesting habitat is confusing and makes any analysis difficult to understand. It is also not clear if these acres overlap, which would actually be the case.

The DEIS at 380 and 430 correctly notes that intermediate harvest will reduce red squirrels, which is reasonable given this species is associated with mid and late seral closed canopy forest (DEIS 253). The DEIS at 430 also notes that intermediate harvest will reduce snowshoe hares. Both the red squirrel and snowshoe hares are key goshawk prey species in Montana. The DEIS claims that other prey species will increase, thereby maintaining goshawk foraging habitat, but which species these are were never identified. Overall, the proposed actions, including both logging and burning, will eliminate or severely degrade goshawk foraging habitat, and thus reduce the potential of this landscape to maintain breeding goshawks. This is all the more likely given that this habitat is already degraded from past logging and fires. It appears that there is only 35% foraging habitat (mid to old forest habitats) in the Project Area (trees over 10 inches dbh) (Table 104), while the current best science recommends 60% of this foraging habitat. In addition, the current best science recommends 20% old growth as prime foraging habitat. The level of old growth in this landscape was never provided. The Project will treat up to almost 3,000 acres through logging and burning, which could reduce goshawk habitat down to 24%. These reductions will also occur within both goshawk postfledging areas. The agency failed to define why this level of habitat is suitable for goshawk breeding in this landscape as per the current best science. It is likely that both goshawk territories will be eliminated, or converted into ephemeral territories, due to habitat losses.

B-Breeding Habitat

C-Red-tailed Hawk

This degradation will be exacerbated by the conversion of much of this logged/burned habitat into red-tailed hawk habitat. The DEIS suggests that there is no science indicating this is a problem, but this is incorrect. An extensive analysis of habitat conversion from goshawk to red-tailed hawk

habitat has been done, and demonstrates this is a severe management problem for goshawks.

D-Population Monitoring The Forest has no population monitoring data for goshawks, so their population trend is unknown. It is likely that the management activities proposed for the Stonewall Project are similar to typical management programs across the Forest, where goshawk habitat is being systematically eliminated and/or degraded. The Project must evaluate habitat trends for this MIS across the Forest, and demonstrate that management activities are not systematically eliminating this MIS from the Forest.

The agency is also violating the Forest Plan, due to lack of population monitoring, by failing to measure the effects of management activities on MIS habitat, including the goshawk. The vague assumptions regarding project impacts on goshawk prey species, and the effect of forest opening on invasion of red-tailed hawks, demonstrate a total lack of any monitoring on management effects on goshawks.

There was no information provided in the DEIS as to what the current estimated population trend of goshawk and goshawk habitat on the Helena National Forest is. So the agency clearly did not take a hard look at how the current project may affect forest viability in both population numbers and habitat availability. There was also no information provided on the productivity and quality of the two goshawk territories in the Project Area. Occupancy rates of nest sites is a good indicator of habitat quality. The agency needs to compare occupancy rates with existing habitat levels, and address what this indicates for this landscape for goshawk viability.

Even though the DEIS suggests that goshawk foraging habitat should be at least 40% (this is not actually science, as the prey present is what determines foraging habitat), the agency then claims that foraging habitat will still be maintained even if the canopy cover is reduced below 40% (DEIS 430).

The Project will not maintain the required size/density of snags for goshawks in harvest units. The current best science recommends 2 snags at least 18 inches dbh per acre in goshawk foraging habitat. This exceeds the Helena Forest Plan snag direction.

16. Fisher