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**Re: Sixty-day Notice of Violation of the Endangered Species Act:  
South Plateau Project, Custer-Gallatin National Forest**

On behalf of the Center for Biological Diversity, Alliance for the Wild Rockies and Council on Wildlife and Fish, we hereby provide notice, pursuant to Section 11(g) of the Endangered Species Act (“ESA”), 16 U.S.C. § 1540(g), that the U.S. Fish and Wildlife Service (“FWS”) and the United States Forest Service (“Forest Service”) are in violation of the ESA, 16 U.S.C. § 1531 et seq., in regards to Biological Opinion and Biological Assessment for the effects of the South Plateau Project on grizzly bears and Canada lynx, as well as the 2022 Custer-Gallatin National Forest Plan Biological Opinion and Incidental Take Statement (“2022 BiOp”).

**STATEMENT OF LAW**

A “threatened” species is “any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.” 16 U.S.C. § 1532(20). The ESA provides for the “conservation of the ecosystems upon which threatened and endangered species depend.” *Id.* §1531(b). “Conservation” means “the use of all methods and procedures which are necessary to bring any ... species to the point at which the measures provided pursuant to this chapter are no longer necessary.” *Id.* § 1532(3).

ESA section 7 requires that all federal agencies work toward recovery of listed species, and it contains both a procedural requirement and a substantive requirement for that purpose. Substantively, it requires that federal agencies ensure that any action authorized, funded, or carried out by the agency is not likely to jeopardize the continued existence of any threatened or

endangered species, or result in the adverse modification of critical habitat for such species. 16 U.S.C. § 1536(a)(2). To carry out the duty to avoid jeopardy and adverse modification of critical habitat, ESA § 7 sets forth a procedural requirement that directs an agency proposing an action (action agency) to consult with an expert agency, in this case, the U.S. Fish & Wildlife Service, to evaluate the consequences of a proposed action on a listed species. *Id.*

Section 9 of the ESA prohibits the “take” of any listed species without appropriate authorization by FWS. 16 U.S.C. § 1538(a)(1)(B). “Taking” under the ESA “means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.” *Id.* § 1532(19). The “take” prohibited by Section 9 need not be the result of purposeful action. *Nat’l Wildlife Fed. v. Burlington Northern Railroad*, 23 F.3d 1508, 1509 (9th Cir. 1994) (trains accidentally hitting and thereby taking grizzly bears constitutes an ESA violation).

Under the terms of section 7(b)(4) and section 7(o)(2), taking that is incidental to and not intended as part of the agency action is not considered to be prohibited taking under the ESA provided that such taking is either exempted by a 4(d) Rule or in compliance with an Incidental Take Statement. However, the section 7 requirement—the duty to initiate and complete consultation—does not change in any way for a threatened species with a species-specific 4(d) rule. FWS has the authority to issue an incidental take statement concurrent with a biological opinion if it concludes that incidental take is not likely to jeopardize the continued existence of the species. 50 C.F.R. § 402.14(i). An ITS authorizes the action agency to “take” listed species without facing ESA liability. 16 U.S.C. § 1536(o)(2); 50 C.F.R. § 402.14(i)(5). This statement must specify the impact of such incidental taking on the species, set forth “reasonable and prudent measures” that the expert agency considers necessary to minimize such impact, and include the “terms and conditions” that the action agency must comply with to implement those measures. 16 U.S.C. § 1536(b)(4); 50 C.F.R. § 402.14(i)(1)(iv). If the action agency adopts such measures and implements their terms and conditions, the resulting level of incidental take authorized in the incidental take statement is excepted from the ESA’s ban on take. 50 C.F.R. § 402.14(i)(5). During this assessment process, as with the entire consultation process, the agencies must use the best available science. *Id.* § 402.14(d).

The measures in an incidental take statement are non-discretionary and must be undertaken by the action agency so that they become binding conditions of any grant or permit issued, as appropriate, for the exemption in section 7(o)(2) to apply. *Id.* § 402.14(i)(5). The action agency has a continuing duty to regulate the activity that is covered by this incidental take statement. *Id.* If the action agency (1) fails to assume and implement the terms and conditions or (2) fails to require the applicant to adhere to the terms and conditions of the incidental take statement through enforceable terms that are added to the permit or grant document, the protective coverage of section 7(o)(2) may lapse. *Id.* § 402.14(i)(4). To monitor the impact of incidental take, the action agency must report the progress of the action and its impact on the species to the Service as specified in the incidental take statement. *Id.* § 402.14(i)(3).

If section 7 consultation is completed, but later becomes inadequate to address impacts on any listed species or critical habitat, the agencies must reinitiate consultation. 50 C.F.R. § 402.16 (2015). “Reinitiation of formal consultation is required” if, among other criteria, “the amount or extent of taking specified in the incidental take statement is exceeded” *Id.* § 402.16(a). The duty

to reinitiate consultation lies “with both the action agency and the consulting agency.” *Salmon Spawning & Recovery Alliance v. Gutierrez*, 545 F.3d 1220, 1229 (9th Cir. 2008).

Lastly, an action agency—here the Forest Service—cannot rely on a faulty biological opinion to fulfill its substantive section 7 duties to ensure it does not jeopardize the continued existence of a listed species. *See Defs. of Wildlife v. EPA*, 420 F.3d 946, 976 (9th Cir. 2005) (*rev’d on other grounds*, *Nat’l Ass’n of Home Builders v. Defs. of Wildlife*, 551 U.S. 644 (2007)); *Resources Ltd. Inc. v. Robertson*, 35 F.3d 1300, 1304 (9th Cir. 1994) (“Consulting with the FWS alone does not satisfy an agency’s duty under the Endangered Species Act.”).

### **FACTUAL BACKGROUND**

On August 7, 2023, Acting District Ranger Nick Mustoe signed a Decision Notice and Finding of No Significant Impact for the South Plateau Landscape Area Treatment Project (“Project”). The Decision Notice authorizes timber harvest and burning on 16,462 acres on the Custer-Gallatin National Forest and includes 5,551 acres of clearcuts, 6,593 acres of commercial cutting and construction of 56 miles of roads in grizzly bear and lynx habitat. Despite the large scale of the Project, the Forest Service authorize the Project without determining or analyzing where and when these activities will take place. The Forest Service claims that the precise location, timing, and scope of the treatments will be decided when the Project is implemented and when crews are on the ground. The Forest Service calls this “conditions-based management.”

Because the timing and site-specific locations of the Project activities are not yet known, the Agencies are unable to adequately analyze the effects of the Project on the listed and proposed species that occur in the Project area. As discussed further below, the Project area lies entirely within the South Madison Lynx Analysis Unit and will clear-cut a large portion of lynx habitat, further reducing the available lynx habitat in the area. The Project area is fully within the Greater Yellowstone Ecosystem Recovery Zone and will impact three Bear Management Subunits: Madison #2, Hebgen Lake #2, and Plateau #1. Subunits provide important hiding cover habitat and movement corridors for grizzly bears outside of Yellowstone National Park. The Project will significantly reduce secure habitat in all of these subunits, increase road density, and act as a barrier to grizzly bears moving in and out of the National Park.

On October 17, 2022, the Forest Service requested consultation with FWS on the South Plateau Project’s impact on grizzly bears, lynx, whitebark pine, and wolverine. The Forest Service determined that the Project “may affect and is likely to adversely affect” grizzly bears, Canada lynx, and whitebark pine. The Forest Service also determined that the Project will have “no effect” on designated lynx critical habitat and is “not likely to jeopardize the continued existence” of wolverines.

The Custer-Gallatin National Forest Plan was most recently updated in 2022. The Agencies initiated and completed consultation on the 2022 Forest Plan’s effects on grizzly bears and lynx. As a result, the FWS issued a Biological Opinion (“2022 Forest Plan BiOp”) and Incidental Take Statement for grizzly bear and lynx which included binding Terms and Conditions.

In regards to Canada lynx, the 2022 Forest Plan incorporated the Northern Rockies Lynx Management Direction (“NRLMD”). The NRLMD sets specific standards which apply to vegetation management activities within mapped lynx habitat. The 2022 Forest Plan BiOp also contains Terms and Conditions to further protect lynx habitat.

The Forest Service has undertaken various efforts to revise its lynx habitat maps. In 2016, the Forest Service published a white paper titled, “Updating the lynx habitat map layer using the latest corporate standardized data and state-of-the-art GIS technology” (“Canfield (2016)”). Canfield (2016) uses a narrower elevation band – 6,000 to 8,800 feet – than that included in the NRLMD’s definition of lynx habitat – 3,500 to 8,000 feet. In effect, the application of Canfield (2016) significantly reduced lynx habitat on the Custer-Gallatin National Forest. The decision to remap lynx habitat has not undergone any analysis regarding its effects on lynx or lynx critical habitat.

In regards to grizzly bears, the 2022 Forest Plan grizzly bear standards are based on the 2007 Grizzly Bear Conservation Strategy for the Greater Yellowstone population. Under these standards, the Forest Service must meet and maintain secure habitat for grizzly bears as it was in 1998 when, as the Forest Service maintains, the grizzly population was doing well and meeting recovery goals. This is commonly referred to as the “1998 baseline.” In effect, the Forest Plan standards that incorporate the 1998 baseline require bear management unit subunits to reach and maintain secure habitat – defined as areas greater than 10 acres in size that are more than 500 meters away from open or gated motorized routes – at levels that existed in 1998.

The Forest Service and the FWS determined that for three subunits on the Forest, the 1998 baseline secure habitat levels were not enough to protect the grizzly bears within those units. These Subunits are Gallatin 3, Henrys Lake 2, and Madison 2- two of which (Henrys Lake 2 and Madison 2) occur in the Project area. For these three subunits, the Forest Plan set baseline levels at full implementation of the 2007 Gallatin National Forest Travel Plan. The Forest Plan sets secure habitat baseline levels for the subunits within the Project area as below:

| <b>Subunit</b> | <b>1998 Secure Habitat Baseline</b> |
|----------------|-------------------------------------|
| Henrys Lake 2  | 52%                                 |
| Madison 2      | 67.4%                               |
| Plateau 1      | 68.6%                               |

In addition to these Forest Plan standards, the 2022 Forest Plan BiOp requires that open road density (OMRD) and total road density (TMRD) also be maintained at the 1998 baseline level. The road density baselines for the subunits within the Project area are as follows:

| <b>Subunit</b> | <b>1998 OMRD</b> | <b>1998 TMRD</b> |
|----------------|------------------|------------------|
| Henrys Lake 2  | 49.9             | 35.2             |
| Madison 2      | 33.7             | 24.0             |
| Plateau 1      | 22.2             | 12.9             |

The Forest Plan also contains standard FW-STD-WLGB-03 that applies to project activities that temporarily reduce secure habitat below the 1998 baseline:

*Temporary Changes in Secure Habitat.* Inside the recovery zone/primary conservation area, project activities shall meet the following conditions for temporary reductions in secure habitat below baseline:

- a. Only one project affecting secure habitat below baseline values may be active within a given bear management subunit at any one time.
- b. Total acreage of secure habitat below baseline values within a given bear management unit shall not exceed 1 percent of the acreage in the largest subunit within that bear management unit. The acreage of a project that counts against the 1 percent limit (for example the amount of secure habitat affected) is measured as the acreage within the 500-meter buffer around any temporary motorized access route or low-level helicopter flight line that intrudes into existing secure habitat.
- c. New temporary roads shall be limited to administrative purposes associated with project activities. Project activities shall not reduce secure habitat below baseline levels for more than four consecutive years. The collective set of temporary roads that affect secure habitat below baseline levels shall be closed to all motorized use after three years. Temporary roads shall be decommissioned such that secure habitat is restored within one year after closure.

The 2022 Forest Plan BiOp Incidental Take Statement Terms and Conditions also requires that Forest Management actions not reduce the percent of secure habitat in each subunit below baseline levels. The Terms and Conditions state that any temporary or permanent reduction below standards is allowed so long as they follow the application of rules listed in FW-STD-WLGB 02 and FW-STD-WLGB 03.

The Agencies concluded that the Project as authorized will result in the violation of many of these standards, but the Project's "sideboards" will preclude any appreciable or serious effects to grizzly bears and lynx, as well as their recovery.

FWS also concluded in the Project Biological Opinion that based on its review of the status of grizzly bears, the environmental baseline, the effects of the action, and the cumulative effects that the decision is not likely to "jeopardize the continued existence" of grizzly bears in the Greater Yellowstone Ecosystem. FWS concluded that the Project may result in some adverse effects and take of grizzly bears but would not reasonably be expected to directly or indirectly reduce appreciably the likelihood of the bear's survival and recovery in the wild by reducing reproduction, numbers, or distribution of the species.

## LEGAL VIOLATIONS

### **Grizzly Bears:**

As an initial matter, without knowing the details of the Project include the timing, extent, and scope of timber units and roads, the Agencies are unable to provide a detailed discussion of

effects of the action on grizzly bears. For example, the Agencies entirely fail to consider potential effects to female grizzly bears as they emerge from their dens during spring- when they are particularly vulnerable to disturbance. As a result, the Agencies inadequately determined the Project's effects – i.e. the amount of take that will result from the Project. Thus, the resulting incidental take statement is ambiguous, broad, and provides no protection against the take that will occur. The conservation measures and reasonable and prudent measures are unknown, vague and discretionary and do not minimize the impacts of the Project on grizzly bears.

Next, the 2022 Forest Plan BiOp and Incidental Take Statement contains a Term and Condition that states, "Management actions that result in temporary or permanent reduction of secure habitat below the applicable baseline are allowed so long as they follow the application rules listed in standards FW-STD-WLGB 02(a-e) and FW-STD-WLGB 03(a-c)." Here, as explained below, the Project results in a violation of FW-STD-WLGB-03 (a), (b), and (c). Thus, because the Project does not comply with these standards, it also does not comply with the 2022 Forest Plan BiOp Incidental Take Statement and the Agencies must reinitiate and complete consultation on both the Project and the 2022 Forest Plan.

The Project BiOp acknowledges that both the South Plateau Project and the North Hebgen Project will occur within Madison #2 subunit and will both affect secure habitat below the baseline when implemented. Instead of demonstrating compliance with FW-STD-WLGB-03(a), which prohibits more than one project within a subunit that reduces secure habitat below baseline, the Agencies state:

. . . activities with South Plateau will be coordinated with the North Hebgen Project in order to ensure that impacts to secure habitat below baseline associated with the North Hebgen Project are complete and temporary roads affecting secure habitat are effectively decommissioned prior to activities occurring associated with the South Plateau Project that affect secure habitat below baseline.

This is not a demonstration of compliance with FW-STD-WLGB-03(a) and the 2022 Forest Plan BiOp Terms and Conditions because the Project Decision Notice authorizes activities within the Madison #2 subunit at the same time the North Hebgen Project authorizes activities within the Madison #2 subunit. Thus, two projects within Madison 2 are authorized and will reduce secure habitat below baseline.

Second, the Project BiOp acknowledges that the temporary road construction and use proposed under the South Plateau Project may not affect more than 1,285 acres or 2.8 percent of secure habitat within the Henry's Lake #2 subunit at any given time in order to comply with FW-STD-WLGB-03(b). However, the Agencies also acknowledge that "the total amount of secure habitat that would be affected in the Henry's Lake #2 subunit is more than 1,285 acres or 2.8 percent of the secure habitat within the subunit." In effect, the Agencies concede that the Project will violate this Forest Plan Standard. In an attempt to justify its actions, the Agencies state that "additional measures will be taken in order to meet the standard FW-STD-WLGB-03." The additional measures are either to drop an unknown number treatment acres and unidentified roads to reduce impact; or implement the Project in "stages". Because the Forest Service does not know where, when, and how it will be implementing the Project, it does not know which one

of these “additional measures” it will choose. Regardless of which one of these “additional measures” the Agencies, the Project violates FW-STD-WLGB-03(b) and the 2022 Forest Plan BiOp Terms and Conditions.

Third, the Agencies concede that activities in the Project subunits would reduce secure habitat below baseline levels for more than 4 consecutive years, in violation of FW-STD-WLGB-03(c). Thus, the Project’s violation of FW-STD-WLGB-03 results in the violation of the 2022 Forest Plan BiOp Terms and Conditions and requires the Agencies to reinitiate and complete consultation on the Project and the Forest Plan.

Moreover, a substantial amount of grizzly bear research has been conducted near the Project area that provides ample information on diets, behaviors, and habitat selection of grizzly bears in habitats nearly identical to those encompassed in the Project area. Further, this area is a known “population sink” or an area where a high rate of grizzly bear mortality occurs. The Agencies have failed to analyze and consider this information as well as best available science on population status, distribution, and recent threats to grizzly bears and grizzly bear recovery when evaluating effects of the Project on grizzly bears. This violates the ESA.

The Agencies further fail to adequately analyze the Project’s effects on grizzly bears in that the Agencies assume that because the Project’s impacts are “temporary,” effects to grizzly bears would be minimal and grizzly bears would reenter the Project area upon completion. Best available science indicates that grizzly bears avoid areas with motorized use for generations. As best available science has repetitively determined, this is because grizzly bears who have experience negative effects in an area will avoid that area and teach their cubs to avoid that area. The Agencies’ failure to analyze this in light of fact that the Project itself will last 20 years, fails to consider an important aspect of the problem—that grizzly bears will likely avoid the Project area for multiple decades.

Additionally, the Agencies fail to properly define and analyze the effects of the Project in the “action area” for consultation purposes. The “action area” includes all areas directly or indirectly affected by the agency’s action and not merely the immediate area involved. Here, the Forest Service and FWS arbitrarily limit the action area to the Madison 2, Henrys Lake 2, and Plateau 1 subunits. Similarly, the Agencies fail to properly define and analyze the “environmental baseline” for consultation purposes as defined by 50 C.F.R. § 402.02. The Forest Service and FWS failed to include and analyze the past and present impacts to grizzly bears (including female grizzly bears), connectivity, recovery, and habitat as part of the environmental baseline.

Lastly, the Project and the Forest Plan consultations both violate the ESA because they rely on 1998 baseline conditions from the 2007 Conservation Strategy. The Agencies have not initiated or completed consultation on the effects of the 1998 baseline condition to determine the effects to utilizing the 1998 baseline on grizzly bears. Nor have the Agencies ensured that the 1998 baseline utilizes the best available science on grizzly bears and threats to grizzly bears; adequately analyzed what those 1998 baseline conditions were in the action area or relevant subunits in 1998; explained why the 1998 baseline is the proper metric to evaluate and measure impacts to grizzly bears and grizzly bear recovery in the action area given that many factors have changed for grizzly bears and grizzly bear management and recovery since 1998, including loss

of two of grizzly bears' four important food sources resulting in an increased reliance on a meat-based diet, more human use of the action area, more fires on the landscape, and an increase in grizzly bear dispersal. The Forest Service and FWS also arbitrarily conclude that compliance with the 1998 baseline will adequately reduce the potential for and minimize the effect of incidental take that may occur from the decision.

In view of all of these deficiencies, the Agencies are in violation of their duty under section 7(a)(2) to “insure” that the Project and the 2022 Forest Plan are not likely to jeopardize the continued existence of grizzly bears. 16 U.S.C. § 1536(a)(2).

### **Canada Lynx:**

The Agencies fail to adequately analyze impacts to lynx by relying on an incorrect definition of Wildland Urban Interface (WUI). The 2022 Forest Plan Incidental Take Statement uses acres of snowshoe hare habitat within occupied lynx habitat as a surrogate measure of incidental take of Canada lynx. Specifically, the Incidental Take Statement states that

. . . if more than 49,125 acres of snowshoe hare habitat within occupied lynx habitat are treated over the life of the CG Plan using the exemptions from and exceptions to the NRLMD vegetation standards, then the level of incidental take we anticipated in this biological opinion would be exceeded and therefore the level of take exempted would be exceeded.

The NRLMD exempts project compliance with vegetation management standards for treatments within the WUI. The NRLMD incorporates the definition of WUI that is found in the Healthy Forest Restoration Act (HFRA). The HFRA defines WUI as “an area within or adjacent to an at-risk community that is identified in recommendations to the Secretary in a community wildfire protection plan.” However, if a community wildfire protection plan defines WUI differently than the HFRA, the Agencies cannot rely on the community wildfire protection plan to provide justification for exemptions from the NRLMD.

Here, the Agencies rely on the Gallatin County Community Wildfire Protection Plan’s definition of WUI, which contradicts the definition of WUI in the HFRA. Therefore, the Agencies inaccurately calculated the number of acres treated within the WUI and therefore failed to provide a detailed discussion of effects of the action as it relates to effects to lynx and compliance with the Forest Plan Biological Opinion and Incidental Take Statement.

Further, the Agencies’ decision to use new criteria and data to map lynx habitat effectively reduces the acreage of protected lynx habitat. The Agencies do so without any analyses on whether the newly map lynx habitat effects lynx and lynx critical habitat. Should the Agencies wish to rely on a new map of lynx habitat, the Agencies must first reinitiate and complete consultation on the effects of newly mapped lynx habitat and determine whether the newly mapped lynx habitat jeopardizes the continued existence of lynx or adversely effects lynx critical habitat. The Agencies failure to make a jeopardy



determination for the newly mapped lynx habitat and their reliance on the newly mapped lynx habitat in its effects analysis for the Project and the 2022 Forest Plan violates the ESA.

Moreover, the Project violates the Reasonable and Prudent Measures set for in the 2022 Forest Plan BiOp Incidental Take Statement for Canada Lynx. The Reasonable and Prudent Measures require adherence to the NRLMD to be exempt from take. However, the Project will result in the violation of NRLMD standards. For example, the Project will clearcut a significant more amount of lynx habitat than is allowed under the NRLMD. Therefore, the Agencies authorization results in take of lynx and requires the reinitiation of consultation on the 2022 Forest Plan.

Finally, the because the Agencies do not yet know or understand the timing, extent, and scope of the Project vegetation units, the Agencies are unable to provide a detailed discussion of effects of the action in violation of the ESA.

The ESA mandates that the Agencies use “all methods and procedures which are necessary to bring any ... species to the point at which the measures provided pursuant to this chapter are no longer necessary.” 16 U.S.C. § 1532(3). By continuing to reduce the already degraded lynx habitat, the Agencies fail to follow the ESA’s mandate. The Agencies have failed to provide a detailed discussion of effects of the action, failed to discuss and disclose best available science, and violated the Terms and Conditions of the Forest Plan BiOp and ITS, requiring reinitiation of consultation of the 2022 Forest Plan. Further, FWS’s failure to issue a Biological Opinion on the effects of the Project on Canada lynx violates the ESA.

In view of all of these deficiencies, the Agencies are in violation of their duty under section 7(a)(2) to “insure” that the Project is not likely to jeopardize the continued existence of Canada lynx. 16 U.S.C. § 1536(a)(2).

### **CONCLUSION**

The Agencies have ignored their duties under the ESA, 16 U.S.C. §1531 *et seq.*, to utilize the best available science, to ensure that its actions do not jeopardize threatened and endangered species, to ensure their actions do not result in unauthorized take of grizzly bears and lynx, and to ensure that their actions promote conservation and recovery of these species. The Agencies’ actions in this matter represent an unlawful departure from its legally binding mandate to protect and recover threatened species and their habitats. If the violations of law described above are not cured within 60 days, the Center and its allies intend to file suit for declaratory and injunctive relief, as well as attorney and expert witness fees and costs.

Sincerely,



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