USDA Forest Service
U.S. DEPARTMENT OF AGRICULTURE

North Seeley Wildland Urban Interface – Highway 83 Project

Decision Notice

and

Finding of No Significant Impact

Seeley Lake Ranger District
Lolo National Forest
Missoula and Powell County, Montana

July 2025

Lead Agency: USDA Forest Service

Responsible Official: Benjamin Johnson, Lolo National Forest Supervisor

For Further Information, Contact: Jeremy Q. Casterson
Deputy Forest Supervisor
Lolo National Forest
24 Fort Missoula
Missoula, MT 59804
406-329-3750

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1. Decision

This notice documents my decision to implement the proposed action as presented in the North Seeley Wildlife-Urban Interface (WUI)– Highway 83 Environmental Assessment[1] (EA). The proposed action, hereafter referred to as the Selected Action, includes vegetation and fuel reduction treatments on a footprint of approximately 8,450 acres, road management activities across the 22,997-acre project area, and recreation improvements in and around the Seeley Creek Nordic Ski Area.

The North Seeley WUI – Highway 83 EA and project record are incorporated by reference in this Decision Notice.

Authorized Activities

The Selected Action will achieve the purpose and need of the project by implementing the activities described below and displayed on the maps in Appendix A. More details are provided in Appendix B.

I have incorporated into my decision the specific resource protection measures to avoid or minimize environmental harm from activities authorized in the Selected Action. These requirements are listed in Appendix C.

Table 1. Summary of Authorized Activities (see maps in Appendix A and more details in Appendix B).

Activity	Acres	Miles
Vegetation Management Activity		
Intermediate Harvest	1,854*	
Regeneration Harvest	682*	
Shaded Fuel Break	539	
Developed Area Vegetation Management	416	
Young Forest Mechanized Thinning	1,987	
Fuels Treatments- Cut, Pile, Burn	247*	
Pre-commercial Thinning	578	
Acquired Land Restoration	2,147	
Vegetation Treatment Total	8,450	
Road Management Activity		
Maintenance for vegetation management activities, including haul routes		75
Store existing NFSR (currently closed to public motorized use)		4
Add Undetermined Road to NFSR (includes storing 20 miles)		96
Decommission NFSR		5
Decommission Undetermined Roads		149
New road construction (includes storing 0.4 miles)		11
New construction on previously decommissioned prism		3

[1] North Seeley Wildlife Urban Interface – Highway 83 Project Final Environmental Assessment

New road construction- Temporary		5
Recreation Activity		
Maintenance and improvements to existing Nordic ski trails		19
Parking area expansion	1	
New Nordic ski trails		7.2
New mountain bike trails		27

* These treatment units may include post-harvest treatment with prescribed fire. The need for post-harvest treatment will be based on site conditions following harvest. Therefore, prescribed fire may occur on up to 2,783 acres.

Vegetation Treatment Descriptions

Intermediate Harvest

Intermediate harvest treatments (e.g., commercial thinning) are designed to enhance growth, quality, vigor, and composition of the existing stand. Generally smaller trees will be removed from the lower and main canopy, retaining the larger trees of desired fire-tolerant and disease-resistant species with gaps between the crowns. Within some stands, prescribed fire will be applied following harvest activities. Increasing stand vigor will help individual trees within the stands combat bark beetle outbreak and decrease mortality and fuel loadings upon the landscape.

Intermediate harvest will occur in Unit 5. Seeley Creek Nordic Ski Trails are within Unit 5 and also fall within MA 21 of the 1986 Lolo National Forest Land and Resource Management Plan (hereafter referred to as the Forest Plan). To meet Forest Plan objectives while sufficiently reducing the hazard from dead trees to ski trail users, pockets of untreated forest, large snags, dead and down woody debris, and other key habitat components will be retained in areas greater than 200 feet from trails and roads.

Regeneration Harvest

Regeneration timber harvest treatments within this project area are emphasized within stands that have low species diversity and are dominated by Douglas-fir trees over 14 inches dbh. These treatments are designed to replace the existing stand with a stand that has a species composition and stocking density that meets desired future conditions specified in management objectives. Regeneration harvests will occur where stand conditions (insects, disease, other pathogens, tree mortality, etc.) do not meet and are not projected to meet desired conditions and where intermediate harvest cannot alter stand development to a desired condition. Prescribed fire or mechanical piling will be applied following harvest to reduce fuel and prepare the site for natural regeneration or planting. Natural regeneration is expected at various densities and species, and many of these units will be planted to ensure regeneration of more fire-adapted, shade-intolerant species, such as larch, ponderosa pine, and western white pine.

Due to existing conditions (i.e., insects and disease), some of the regeneration harvest treatments will result in forest openings that will exceed the Regional 40-acre opening size limitation (Forest Service Manual (FSM) 2470, Section 2471.1, Region 1 Supplement 2400-2016-1) (see Appendix

B Table B-2). To exceed this size, a 60-day public review period and Regional Forester approval was completed and approved[2].

Regeneration harvest treatments for the Highway 83 project are not clearcuts. Varying densities of trees will be retained within these areas, from scattered individuals to groups consisting of the largest, healthiest trees. However, compared to intermediate harvest treatment areas and untreated forests, regenerated areas will appear as openings until new trees grow to fill the site.

Shaded Fuel Break

Shaded fuel breaks will be created in defensible areas along Highway 83 to reduce fuels by decreasing stand density and increasing height to base tree crown ratios. An area such as the Highway 83 corridor is a feature favorable for defense and can effectively aid in fire suppression activities. This defensible area will also provide public and administrative ingress/egress in the event of a wildfire or emergency within the Seeley-Swan WUI. Where possible, mechanized equipment will be used to cut and remove mid and subcanopy trees. Removal of trees along Highway 83 will also reduce gravity hazards to a busy state highway by reducing probability of trees falling on the highway during wind storms or snow events.

In inaccessible areas, trees will be cut by hand with chainsaws. Larger overstory trees will be retained. Cut material will be piled and burned in areas inaccessible to mechanized equipment. Where practicable, a small excavator will be used to pile the cut material. The remainder of the material will be piled by hand.

Developed Area Vegetation Management

Developed area vegetation management will occur within Lake Alva Campground, Rainy Lake Campground, and Leased Recreation Sites (e.g., Cabins, Tamaracks Resort). Treatments will range in intensity from thinning treatments to overstory removal and reforestation. For example, some sites may require hazard tree removal to address the recent Douglas-fir mortality. Others may require thinning to reduce ladder and crown fuels in conjunction with piling and burning to address surface fuels. While the former treatments can focus on retaining overstories, other forests, such as Lake Alva Campground, have decades of compounding stressors that make it necessary to remove overstory trees. These sites will be reforested with ponderosa pine, western larch, or western white pine where it is necessary to remove trees that provide the overstory canopies to ensure the long-term aesthetic value of the site and to maintain public safety.

Young Forest Mechanized Thinning

Young forest mechanized thinning provides the opportunity to improve the health of young forests composed of trees mostly 50 to 60 years in age with high stocking rates. These stands are generally uniform to two-story structure and have been in suppression mortality phase of development for at least the last 10 to 15 years. Tree size classes range from 6- to 10-inch dbh. Thinning will provide growing space to reduce competitive stress, resulting in trees that grow bigger and faster. Variable retention can be expected with anticipated crown decreases ranging from 35 to 65 percent from the existing overstory canopy. Removal is emphasized in the suppressed and intermediate strata of the stand with larch and ponderosa pine favored for

[2] Northern Region Request for Approval to Exceed Maximum Even-aged Regeneration Harvest Opening Size Limitations for the North Seeley WUI – Highway 83 Project. Regional Forester Approval Date 09/12/24. Public Notice Publication Date 08/21/2023.

retention. Trees cut during this process will generally be small sawlog and below sawlog merchantability specifications and may be removed for small diameter markets where/if possible.

Fuel Treatments- Cut, Pile, Burn

Fuel treatments units will receive single prescribed fire treatments or a combination of treatments, including jackpot burning, broadcast burning, piling and burning, underburning, whole tree yarding, lopping and scattering, and chipping or mastication, as described below. Conditions and tools will be considered as appropriate to keep smoke within Missoula County permitted levels. Fuel treatments will include any of the following:

Jackpot burning is a fuel reduction/site preparation treatment in which a continuous fuel bed is not present. Jackpot burning is conducted when fuels are scattered with isolated accumulations distributed across the treatment unit. It will be used in areas where stand conditions necessitate its use to reduce the risk of scorching or stressing residual trees.

Broadcast burning (mixed severity) is a prescribed fire burning through a continuous fuel cover. It will be used in areas with larger fuels where there is less concern for killing or damaging residual trees.

Underburning (low severity) will be used in areas where the fuel bed is fairly continuous and generally small (up to 3-inch diameter), and conditions are such that fire will spread in a predictable and consistent manner. Underburning implies that there is a live overstory present and often a live understory as well. Underburning will also be used to raise the base height of live crowns, which is desirable to reduce crown fire initiation. Prescriptions for underburning usually include an acceptable mortality level in the live component.

Hand pile and burning provides even greater protection to residual trees but is more labor intensive and costly. Material is piled by hand then burned under conditions when the risk of fire spread is minimal. Hand cutting and piling is anticipated as an initial treatment in these units followed up by pile burning.

Machine (e.g., excavator) piling and burning provides the same benefits as hand piling and burning but is used to treat larger diameter fuels that cannot be effectively manipulated by hand. Material is piled by machine and piles are burned under conditions when the risk of fire spread is minimal. Machine piling is generally limited to gentle terrain (i.e. slopes less than 40 percent).

Whole tree yarding means entire trees are yarded to the landing. Tops, limbs, and other unmerchantable large materials are piled for later treatment or utilization at the landing site.

Lop and scatter is a fuel reduction treatment prescribed when rearranging the fuels or reducing their depth is desired. Lopping facilitates decomposition and nutrient cycling by placing the fuels closer to the forest floor.

Chipping or mastication rearranges fuel complexes and facilitates decomposition and nutrient cycling.

Pre-commercial Thinning

Pre-commercial thinning will occur in young (20 to 50 years old) stands composed of ponderosa pine, western larch, and mixed conifer forests that were established from regeneration harvests from the late 70s, 80s, and 90s. Stocking rates are high, competition for resources is extreme, and

the competitive advantage of existing fire-adapted species within these stands is being compromised. Anticipated retention will be around 100 to 200 trees per acre with emphasis for retention focusing on larch and pine that are the most dominant, vigorous, and well-formed. The trees cut during this process will be left on site and allowed to decompose back into the soil. Where fuels objectives cannot be met fuels will be piled and burned. Size classes within the stand generally targeted for treatment are in the 3- to 6-inch dbh.

Acquired Land Restoration

Acquired land restoration treatments will occur in formerly owned industrial timberlands which the LNF acquired within the last one to two decades. On these lands, the best-adapted dominant and codominant trees were harvested while intermediate and suppressed trees of low merchantable value were retained. A combination of treatments may be needed and will emphasize fuels reduction to reduce wildfire severity, resistance and resilience to stressors, promoting fire-adapted tree species (larch and ponderosa pine), and to remedy effects of past unsustainable management. Stand improvement activities via thinning, planting, slash treatment, and/or weed spraying may occur within these lands to acquire desired future conditions.

Transportation Management Descriptions

Road Maintenance for Project Activities

Road maintenance for project activities will include surface blading, road surface shaping and widening to the extent necessary to accommodate equipment, ditch cleaning and reshaping, roadside clearing and/or brushing, seeding disturbed areas, drain dip and cross drain cleaning and construction, culvert cleaning, armoring, and/or replacement, slash filter windrow and sediment trap construction near live water crossings, and gate installation.

Maintenance activities will ensure adequate road surface for vegetation treatment haul truck transportation. Haul routes overlap long-term road management activities, and while haul activity is temporary, the mileage has been included to reflect the short-term duration of road management activity. The level of maintenance for each road has not been determined at this time. Some roads are in existing good condition and will need minimal maintenance to be used as haul routes. Other haul routes are nearly naturally decommissioned and will require reconstruction prior to use. Therefore, for the purposes of this analysis, all haul roads are assumed to receive the maximum level of maintenance (full reconstruction) to gauge the maximum potential of impact. However, this level of maintenance will not be necessary for all roads, so impacts are projected to be less. New construction haul routes are not included under maintenance.

Storage Treatments

Storage treatments will leave the road prism intact, but in a stabilized condition until needed for future use. Storage activities will include closing the road entrance to all vehicle use. Storage treatments will also generally include road surface scarification, placement of woody debris on roads, removal of culverts and road fill at stream crossings, and installation of waterbars. Although the road prism will remain intact after storage treatments, it will not be accessible to motorized vehicles without reconstruction. Road storage will not affect legal, public motorized access.

Specific treatment levels for each of the 24 miles of road storage have not yet been identified. Potential treatment options vary according to the level of impact the existing road is causing to natural resources. For example, a road that is already fully vegetated with no potential for unauthorized motorized use and is located on stable soils without any stream interaction, will not require any physical treatment. It will therefore receive a Level 3-SN 'administrative' treatment which will label it as stored in USFS databases but no physical changes will be made on the ground. Conversely, a road without any vegetation and high potential for unauthorized motorized use, and that is located on unstable soils and/or is causing adverse stream effects (e.g., undersized culverts), will require physical treatment to put it into a stable resource condition. As a result, on-the-ground treatments will include some combination of entrance obliteration, culvert removal, and surface scarification/slash (Level 3-S). The appropriate level of treatment will be determined by Lolo staff prior to implementation.

Regardless of treatment level, all 24 miles of road storage will be undrivable by motorized vehicles.

Add Undetermined Road to NFSRs

As part of this planning process, the USFS reviewed the existing road system within the project area and identified several undetermined (non-system) roads, the bulk of which reside on former private industry lands that were acquired in recent years. These roads were examined as part of the Travel Analysis Process (TAP). Approximately 96 miles of existing Undetermined roads were identified as needed for long-term forest management will be added to the NFSR. These roads will be closed to public motorized use year-long. Approximately 20 miles of these roads will be placed in storage (see storage treatment description) and available for future administrative use.

Decommission

During the TAP, approximately 5 miles of NFSR and 149 miles of undetermined road were identified as unneeded roads and will be decommissioned. Specific treatment levels for each of the 154 miles of road for decommissioning have not yet been identified. Potential treatment options vary according to the level of impact the existing road is causing to natural resources. For example, a road that is already fully vegetated with no potential for unauthorized motorized use and is located on stable soils without any stream interaction, will not require any physical treatment. It will therefore receive a Level 3-DN 'administrative' treatment which will label it as decommissioned in USFS databases but no physical changes will be made on the ground. Conversely, a road without any vegetation and high potential for unauthorized motorized use, and that is located on unstable soils and/or is causing adverse stream effects (e.g., undersized culverts), will require physical treatment to put it into a stable resource condition. As a result, on-the-ground treatments will include some combination of entrance obliteration, culvert removal, and surface scarification/slash (Level 3-D), or even fully recontouring the entire road prism to match the surrounding hill slope (Level 5-D). The appropriate level of treatment will be determined by Lolo staff prior to implementation.

For the purposes of this analysis, all roads are assumed to receive the maximum level of decommissioning (full obliteration recontouring and restoring natural slopes) in order to gauge the maximum level of impact. However, it is very likely this level of decommissioning will not be necessary for all roads. Approximately 60 percent of the roads to be decommissioned have been naturally reclaimed, although some may still need culverts removal. All roads for

decommissioning are currently closed to legal public motorized use except approximately 0.3 miles of road 16323, which is currently open seasonally.

Regardless of treatment level, all 154 miles of road decommissioning will be undrivable by motorized vehicles. Furthermore, the minimum amount of physical decommissioning treatment implemented throughout the project area will be 14 miles. This will offset the 14 miles of new road construction to ensure watershed indicators will trend in a neutral or upward direction after project completion.

New Construction

New road construction will include approximately 9 miles to access vegetation treatment areas and approximately 2 miles to relocate roads to reduce stream crossings. New road construction will consist of multiple segments ranging in length from 0.02 to 1.0 miles. The location, design, and construction of these roads will follow Best Management Practice (BMP) standards to minimize potential environmental impacts. Newly constructed roads will be closed to public motorized use yearlong. Approximately 0.4 miles of these roads will be stored following use for this project (see storage definition above) and the rest will restrict public motorized use yearlong. Approximately 3 miles of previously decommissioned road prism will be constructed on the existing road footprint, used for vegetation management activities, and stored at the end of the project.

Temporary Roads

Temporary roads will be located in mid to upper slope locations and will not cross mapped intermittent or perennial streams. Temporary roads will vary from approximately 0.05 to 0.6 miles in length and be constructed to a minimal standard to provide access for harvesting equipment and log trucks. After use for this project, these roads will be decommissioned.

Recreation

Seeley Creek Nordic Ski Area Improvements

The Seeley Creek Ski Area improvements include modifying and expanding the existing 19-mile trail system, trail maintenance and improvements, and creating additional parking. New sections of trail - paralleling the Auggie Cut-off Snowmobile Trail, will allow for a traditional 20k loop for race events. Beginner trails are also needed for new skier safety. Treatment of the Seeley Creek Nordic Ski Area will ideally occur during summer months to avoid impacting winter recreation (winter currently receives the highest use for the area).

Trail Improvements

- Widen existing trails to 15 feet with a 25-foot total corridor
- Regrade trail surfaces to be flat (no side slopes or crown)
- Install approximately 20 new trail maps and posts for marking trails
- Install additional safety signs as needed (difficulty level, cautionary, blaze diamonds, prohibitive [no dogs, no snowmobiles])
- Reroute Logging Camp Loop for heavy use by reducing grade and increasing width for beginners
- Expand race starting area
- New three panel roofed kiosk

New Trails

- Approximately 7.2 miles of new trails to increase beginner level trail opportunities, create loops to decrease 2-way skier traffic, and create a 20k route for races separate from snowmobile trails. The 20k route will be primarily located on an old logging road prism.
- Approximately 0.7-acre groomed practice/teaching area

Parking

- New small parking area
- Expand existing parking area by approximately 1 acre
- Replace existing or add double vault toilets

Seeley Lake Mountain Bike Trails

The Selected Action will construct 27 miles of mountain bike trails in the southern end of the project area, near the existing and new Seeley Creek Nordic Ski Trails (Appendix A Map 10). Approximately nine trails will be constructed with various usage and abilities.

2. Changes in the Environmental Assessment and Analysis

The North Seeley WUI-Highway 83 EA has been updated since it was originally issued in April 2025 along with some resource specialist reports. Updates were made in response to comments and to address minor editorial corrections. The more noteworthy updates to the EA and analysis reports are summarized below:

- An appendix was added to the Fire and Fuels specialist report[3] in response to comments to provide clarifying information on project alignment with the HFRA definition of WUI.
- The Biological Assessments for grizzly, lynx, and wolverine were appended to the Wildlife specialist report[4] for full disclosure of impacts.
- The Biological Assessment for bull trout was appended to the Fisheries specialist report[5] for full disclosure of impacts.
- In response to public comment, additional clarifying information was provided in the Forest Vegetation Report[6] that demonstrates the project's consistency with Lolo National Forest Plan Management Area 21.
- Additional Silviculture RPMs were added to the proposed action (Table C-1. Appendix C of the EA) to address comments concerning large tree retention and Management Area 21.
- RPM WILD-12 was added to the proposed action (Table C-1, Appendix C of the EA) to address comments regarding mountain bike trail impacts to grizzly bear.

[3] North Seeley Wildlife Urban Interface – Highway 83 Project Fire and Fuels Report
[4] North Seeley Wildland Urban Interface – Highway 83 Project Wildlife Report for Terrestrial Wildlife
[5] North Seeley Wildland Urban Interface – Highway 83 Project Fisheries Analysis
[6] North Seeley WUI – HWY 83 Vegetation Report

- RPM WILD-13 was added to the proposed action (Table C-1, Appendix C of the EA) to ensure protection of lynx habitat outside of the WUI as defined by HRFA.
- Minor updates to other RPMs were also completed in response to various comments.

3. Rationale for the Decision

I have made my decision based on the information in the North Seeley WUI – Highway 83 Project EA, the supporting documentation in the project record, and consideration of issues, public comments, and relevant science. I have determined my decision is consistent with the Forest Plan, laws, regulations, and agency policy outlined in Forest Service manuals and handbooks. I have also considered the potential cumulative effects. I believe the Selected Action provides for the best balance of management activities to respond to the purpose and need, while being responsive to issues and public input identified through the analysis. I have adopted all practical means to avoid or minimize environmental harm from the Selected Action.

The alternatives I chose from included:

- No Action
- Proposed Action

Meeting the Purpose and Need

The purpose and need for the North Seeley WUI – Highway 83 project is listed below and discussed in detail in the EA, chapter 1.

The need for action is to address the existing hazardous conditions described in the project background sections of the EA (Section 1.4), while meeting USFS requirements to protect wildlife habitats, promote economic needs, and transportation management.

Based upon the existing conditions of the project area and consistent with the Forest Plan direction and its goals, the purpose of the North Seeley WUI – Highway 83 project is to:

- Reduce fuels accumulations in the WUI to moderate wildfire hazard, intensity, and potential spread to communities and natural resources.
- Restore vegetative conditions that are:
    - resistant to undesirable effects of fires, insects, disease, and drought;
    - resilient[7] in response to those natural disturbances;
    - promote ecological processes that would sustain composition, structure, species, and genetic diversity in the future.

[7] Resilience is defined as the ability of a social or ecological system to absorb disturbances while retaining the same basic structure and ways of functioning, the capacity for self-organization, and the capacity to adapt to stress and change (FSM 2400, Ch 2470).

- Maintain or improve grizzly bear, bull trout, and aquatic and riparian habitat where possible.
- Provide for public health and safety in areas of high public use along roads, highways, resorts, campgrounds, other high use recreation areas, and utility corridors.
- Provide wood products that contribute to local and regional economies and the sustainable supply of timber from NFS lands.

Reduce Fuels

My decision addresses community concerns regarding wildfire risk. Approximately 53 percent of the project area is within the wildland urban interface as defined in the Seeley-Swan Community Wildfire Protection Plan, a component of the 2018 Missoula County Wildfire Protection Plan, and 100 percent of the authorized vegetation treatment acres are within it. The project also resides in the Condon and Barite Firesheds as defined by the Wildfire Crisis Strategy National Registry and the Montana State Action Plan. Values at risk within and adjacent to the project area include the town of Seeley Lake and associated critical facilities, multiple bridges, private land and residences, and Federal, State, and private timberlands. Therefore, I believe it is important to address forest fuels in this area. Treatments are objective based, meaning we will use various treatments to meet objectives. If harvest meets the objectives, then there may not be a need to follow up with burning. Conversely, if objectives are not met through harvest and burning, multiple burns may be required.

The analysis summarized in the EA indicates that the vegetation treatments in the Selected Action will modify fire behavior to reduce wildfire severity. These conditions will greatly improve the effectiveness of initial attack fire suppression efforts, reducing the potential for fire originating on NFS land to burn onto other ownerships.

Restore Vegetative Conditions

The history of natural fire suppression within the project area combined with natural vegetation development and previous timber practices has generally resulted in a loss of tree age class diversity, denser forest canopies, and a shift to a higher proportion of shade tolerant tree species. The consequence is a more homogeneous forest that is less resilient to insects, disease, fire, and changes in climate. Past and ongoing tree mortality is evident, primarily from root disease, bark beetles, and inter-tree competition.

One of the primary Forest Plan goals for this area is to provide for healthy forest stands. My decision authorizes a combination of timber harvest, mechanical and non-mechanical non-commercial treatments, and prescribed burning, on a footprint of approximately 8,450 acres to reestablish a mosaic of tree age classes in varying patch sizes and lower stand densities favoring fire- and disease-tolerant tree species. These treatments will reduce root disease susceptibility, risk of insect predation, and likelihood that treated stands will support high-severity fire. Resultant forest stands will have structures, densities, and species composition that are more adaptable and sustainable over time.

All vegetation treatments are designed to be consistent with scientific literature and local experience with similar treatments in similar forest types. A discussion of the scientific basis for these treatments is contained in Appendix 4 of the North Seeley WUI – Highway 83 Vegetation

Report[8]. The analysis summarized in the EA, as supported by the documentation in the project record, clearly displays that the authorized vegetation activities will not have significant adverse effects on the environment.

Maintain or Improve Habitat

Forest Plan goals direct forest management actions to contribute to recovery of threatened and endangered species, provide habitat for wildlife species, and provide clean water and ecosystems (Forest Plan, page II-1). The analysis summarized in the EA indicates transportation and vegetation management actions will maintain grizzly bear and aquatic habitats.

New road construction will be limited to roads needed to reach vegetation actions and adjust roads away from streams; in terms of habitat impacts, new road construction will be offset by decommissioning unneeded roads. Decommissioning unneeded roads will at a minimum maintain grizzly bear and aquatic habitats with the potential to improve habitats, depending on the degree of decommissioning. Sediment delivery to aquatic habitats will be reduced, and overall grizzly secure habitat is expected to increase.

The selected vegetation treatments are expected to maintain current conditions of grizzly bear habitat. Temporary effects to grizzly bear habitat will occur, such as displacement and shifts in habitat types mimicking natural disturbance patterns. Vegetation treatments will decrease the risk of high-severity wildfires in the project area. With the implementation of design features, such as no work during the grizzly bear denning season in denning habitat, effects from vegetation treatments will be limited and in the long-term maintain grizzly bear habitat in the project area. The selected vegetation treatments are also expected to maintain current conditions of aquatic habitat; impacts to hydrologic resources will be mitigated through application of riparian habitat conservation areas and other RPMs and SOPs outlined in Appendix C.

Public Health and Safety

The Selected Action will meet this purpose by removing hazardous trees from the landscape, particularly near recreation areas, roadways, and utility corridors. This will reduce the number of hazard trees on the landscape that pose direct risk to people, property, and infrastructure. Removing hazard trees from utility corridors will reduce the risk of wildfire caused by contact with transmission lines. Reducing fuels and restoring more resilient vegetative conditions will reduce the risk of wildfire and wildfire intensity in the project area and the surrounding area.

Support Communities

One of the goals outlined in the Forest Plan is to provide a sustained yield of timber and other outputs at a level that will help support the economic structure of local communities and provide for regional and national needs (Forest Plan, page II-1). Harvest treatments that achieve vegetation restoration objectives will yield various wood products to local and regional forest industries. Although economic feasibility and supporting local economies is a consideration during project development, the existing and desired stand and landscape conditions drove the selection of harvest systems and not the potential for greatest dollar return. In doing so, the Selected Action will also contribute to the maintenance of a forest industry infrastructure, which provides employment, benefitting local communities, and markets for products that result from

[8] North Seeley WUI – HWY 83 Vegetation Report

forest restoration and other projects. I recognize the need for a strong forest industry to help accomplish forest restoration and other vegetation treatments now and into the future.

In consideration of the goals and objectives of the Forest Plan, I believe it is important for the Forest Service to support local communities especially where the agency manages a large proportion of the land base as it does in both Missoula and Powell Counties. The North Seeley WUI – Highway 83 project will contribute employment opportunities within these counties. I have decided to proceed with the Selected Action because it will contribute both directly and indirectly to the economy of Missoula and Powell Counties and surrounding areas (EA, section 3.14).

Consideration of Public Comments

This is a highly collaborated project starting with MTDOT in 2019 and evolving into implementation of the Seeley Swan Community Wildfire Protection Plan for the Seeley Lake area. Collaboration has included discussions with the Southwest Crown of the Continent Collaborative (SWCC), Blackfoot Challenge, Seeley Nordic Club, Scenic Montana Trails, and Seeley Lake Community Council. This collaboration yielded at least one design criteria being offered and accepted from the SWCC in addition to proposals from Scenic Montana Trails and the Seeley Nordic Club.

I value public input and carefully considered the comments received on this project. My staff addressed the issues raised during the initial scoping on the proposed action by modifying the proposed action, refining the project design, identifying additional resource protection measures, and by conducting analysis to determine environmental effects (EA and supporting documentation in the project record). Since that time, we received additional comments on the North Seeley WUI- Highway 83 EA (April 2025). Responses to public comments on the EA are contained in Appendix D of this Decision Notice. My staff also reviewed and considered literature provided by the public[9,10]. The following summarizes a few key issues raised by the public and how they were addressed.

Many expressed support to the Forest Service in responding to the vegetation needs in the project area. Multiple comments were in favor of using the Emergency Action Determination (EAD) to expedite the process and address urgent fuels concerns. A desire for increased recreation opportunities was proposed by the public; the Forest Service responded by working with local recreation groups to develop the Selected Action recreation activities.

A number of comments received were in opposition to the use of timber management as a form of fire/fuels management and ecological restoration. Commenters disputed the ability of timber management to achieve desired future conditions of the project, the effect of timber management on wildfires, and also the need for home defense zones. Literature was provided by commenters

[9] North Seeley Wildland Urban Interface – Highway 83 Project Response to Literature Submitted by The Public During the Scoping Period, May 2025
[10] North Seeley Wildland Urban Interface – Highway 83 Project Response to Literature Submitted by The Public During the 30-day Comment Period on the Environmental Assessment, May 2025

and considered[11,12]. These issues are addressed in the EA, Vegetation Report[13] and Appendices, and Fire and Fuels specialist report[14]. The North Seeley WUI-Highway 83 project documents acknowledge that wildfires are inevitable. Part of the purpose and need of the project is to reduce forest fuels to reduce potential wildfire intensity particularly with regard to the WUI. However, the US Forest Service has no jurisdiction of fuel treatments on private property. The Forested Vegetation[15] specialist report Appendix 4 Scientific Basis for Restoration discloses the scientific literature used to develop the proposed action, including timber management activities to reduce wildfire intensity and achieve desired future conditions.

Other comments received during the comment period expressed concern about proposed treatments in old growth forest, as defined by Green et al. 1992, errata 2011 as well as Lolo Forest Plan Management Area 21. In response, my staff responded to these comments which are included in Appendix D of this Decision Notice. Furthermore, as disclosed in the project's Vegetation Report[16] and associated appendices, design of treatments in old growth stands were based on ecological concepts, restoration principles, and is supported by scientific literature. The objectives of these treatments are to reduce the potential for stand-replacing wildfire, reduce susceptibility to insects and diseases, improve resilience to climate stresses such drought, and provide for old growth succession. All treatments, including commercial harvest, will restore resistance and resilience in old growth stands. These reports also address post treatment effects of forest's sequestration rates.

Comments were received regarding concerns about wildlife and fisheries, particularly these species listed under the Endangered Species Act- grizzly bear, Canada lynx, and bull trout. Multiple RPMs to mitigate impacts to wildlife and fisheries resources were developed during project design as well as in response to public comments (Appendix C). Consistent with Section 7 of the Endangered Species Act, the Forest Service completed biological assessments for these species and consulted with the U.S. Fish and Wildlife Service (FWS) regarding project findings. See the biological assessments appended to the wildlife specialist report[17] and fisheries specialist reports[18]. The FWS provided a response and biological opinion June 18, 2025[19]. Responses to individual issues regarding these species provided during the comment period are contained in Appendix D of this Decision Notice.

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[11] North Seeley Wildland Urban Interface – Highway 83 Project Response to Literature Submitted by The Public During the Scoping Period, May 2025
[12] North Seeley Wildland Urban Interface – Highway 83 Project Response to Literature Submitted by The Public During the 30-day Comment Period on the Environmental Assessment, May 2025
[13] North Seeley WUI – HWY 83 Vegetation Report
[14] North Seeley Wildlife Urban Interface – Highway 83 Project Fire and Fuels Report
[15] North Seeley WUI – HWY 83 Vegetation Report
[16] North Seeley WUI – HWY 83 Vegetation Report
[17] North Seeley Wildland Urban Interface – Highway 83 Project Wildlife Report for Terrestrial Wildlife
[18] North Seeley Wildland Urban Interface – Highway 83 Project Fisheries Analysis
[19] USFWS. 2025. Concurrence letter and Biological Opinion. Montana Ecological Services Office. Ecosphere Number: 2024-0091165

4. Public Involvement

Scoping

On August 21, 2023, an availability notice for the scoping letter was sent to nearby landowners, organizations, other agencies, and individuals who had previously requested notification about the types of activities included in the project. The scoping letter, which described the proposed action and associated maps, were posted on the Lolo National Forest website. Fifteen comment letters were received from agencies, private individuals, and organizations. Issues identified from public comments are addressed in the EA, section 1.6.1.

Environmental Assessment

On April 4, 2025, a notice of availability of the North Seeley WUI – Highway 83 EA was sent to individuals and organizations that had previously commented on or expressed interest in the project. The EA was posted on the Lolo National Forest website. The 30-day comment period on the EA began with the publication of legal notice in the Missoulian newspaper on April 10, 2025. At the close of the comment period, 13 letters had been received, and 2 comments were collected at the public meeting on April 29, 2025. Two additional letters were received by email after the comment period closed. The agency's response to comments is contained in Appendix D of this Decision Notice.

5. Finding of No Significant Impact

The Finding of No Significant Impact discussion considers and incorporates by reference, all information included in the North Seeley WUI – Highway 83 EA, as well as documentation in the project record. Pertinent specialists have reviewed the proposal and provided input. After considering the effects described in the EA, I have determined that the Selected Action will not have a significant effect on the quality of the human environment based on the context and intensity of its impacts (40 CFR 1508.27). Therefore, an environmental impact statement will not be prepared.

I base my findings on the following:

Degree of Effect

For the North Seeley WUI – Highway 83 Selected Action, the context of the environmental effects is described in the EA. This project is specific in scope and is designed to reduce adverse environmental effects. The project area is limited to areas that allow the FS to address impacts of insects and disease attributed to the Rice Ridge Fire, previous land uses, reduce fuels within the WUI, update the transportation system, and reduce potential safety hazards in recreation areas while increasing recreation opportunities. The selected activities are limited in duration, with seasonal biological and recreational considerations applied to reduce impacts. Resources affected by the proposal are described in the EA and supporting documentation located in the project record. Effects are local in nature and will not contribute to significant effects to regional or national resources. The project is consistent with the Forest Plan. Based on the factors below, I find the effects of the Selected Action will not contribute to significant environmental effects within or beyond the project area.

Both short-term and long-term effects

The analysis considered not only the direct and indirect effects of the project, but also their contribution to cumulative effects (EA Chapter 3). Past, present, and foreseeable future actions have been included in the analysis (EA Appendix D). Short-term effects from the project have been minimized or eliminated through resource protection measures (RPMs) and standard operating procedures (SOPs) (Appendix C). For this project, there are no known long-term adverse effects or cumulative effects to resources such as soils, wildlife, water, or fisheries. Impacts are within the range of effects described in the 1986 Lolo National Forest Plan Final Environmental Impact Statement. Based on the detailed resource reports contained in the project record and summarized in the EA (Chapter 3), I find that the specific direct, indirect, and cumulative effects of the Selected Action are not significant.

Both beneficial and adverse effects.

Adverse and beneficial impacts have been assessed (EA Chapter 3). The Selected Action was developed using RPMs and SOPs that were informed by the results of past actions, professional and technical insight and experience, public input, field surveys and reconnaissance, and incorporation of pertinent research. Resources expected to incur primarily beneficial effects include forested vegetation, fire and fuels, recreation, and economics. Other resources, including soils, water resources, aquatics, wildlife and threatened and endangered species, botany, transportation, and visual and scenic resources, are anticipated to experience both beneficial and adverse impacts. Generally, adverse impacts occur during implementation followed by no effect, minimal effects, or beneficial effects. Refer to EA Chapter 3 for details and associated resource reports contained in the project record. Potential adverse effects from the Selected Action have been minimized or eliminated through project design or resource protection measures (Appendix C). Impacts are within the range of effects described in the 1986 Lolo National Forest Plan Final Environmental Impact Statement. Based on the impact analysis in the detailed resource reports contained within the project record and summarized in the EA, I conclude that the adverse effects of the Selected Action are not significant.

Effects on public health and safety.

The Selected Action will have no significant or unacceptable effects on public health or safety because Occupational Safety and Health Administration (OSHA) safety regulations will be met during implementation, and inspectors will monitor all aspects of implementation to ensure public safety. Timber purchasers are required to comply with all State and Federal fire requirements and regulations. The selected activities (timber harvest, hauling) have historically occurred along roads near and within the North Seeley project area without creating public safety or health problems. The Selected Action contains design features to protect public health and safety during project implementation (Appendix C). For instance, all burning of slash and natural fuels will comply with State Air Quality Standards and be coordinated through the Montana Airshed Group. Herbicide treatment of weeds along roads will comply with label directions and be consistent with mitigation measures outlined in the 2007 Lolo National Forest Integrated Weed Management EIS and Record of Decision. The risk to public health and safety during project implementation is low. Implementation will include advance notice of closures for timber harvest (public meetings, website, press releases, and postings), and signing at appropriate locations. The project will reduce the potential for, and intensity of, subsequent wildfire and increase the probability that fire suppression strategy and tactics are successful.

Hazard trees within the project area, particularly within (MA-9) the Chain of Lakes / Highway 83 recreation corridor and the Seeley Creek Nordic Ski area, are a safety concern. The Selected Action will reduce this safety concern. In addition, vegetation management activities will minimize impacts to recreation sites from wildfire.

This project is consistent with the Clean Water Act and Forest Service responsibilities under the Clean Water Act by adhering to state water quality standards (EA section 3.7; Hydrology specialist report[20]).

No significant effects to public health and safety are likely to occur because of the Selected Action.

Effects that would violate Federal, State, or local law protecting the environment.

This project will not violate state, Federal, or local law protecting the environment. It also meets the National Environmental Policy Act (NEPA) disclosure requirements (North Seeley WUI – Highway 83 Project EA). The project is consistent with the Forest Plan and other laws, regulations and policies as described in the EA and supporting documentation located in the project record.

The project will not impact any parklands, prime farmlands, ecologically critical areas, inventoried roadless areas, or designated wild and scenic rivers (these special areas are not present in the project area). There are no adverse effects to wetlands within the affected area due to application of riparian habitat conservation area (RHCA) buffers (Appendix C).

A summary of project compliance with relevant laws and regulations is provided in the following section. Also refer to the project EA, resource reports, and project record for additional information.

6. Findings Required by Law, Regulation, Policy, and Other Considerations

I have determined that my decision is consistent with the Forest Plan as well as laws, regulations, and agency policies related to this project. The following summarized findings required by major environmental laws.

The National Environmental Policy Act (NEPA)

NEPA requires Federal agencies to: (a) use a systematic interdisciplinary approach in planning and decision-making; (b) consider the environmental impact of proposed actions; and (c) consider alternatives to the proposed action. I find that the analysis process and environmental analysis documentation of the North Seeley WUI – Highway 83 project is consistent with NEPA.

[20] North Seeley Wildland Urban Interface - Highway 83 Project Hydrology Resource Report

The National Forest Management Act (NFMA)

The National Forest Management Act (NFMA) and accompanying regulations require several specific findings be documented at the project level. I reviewed the Selected Action and found the following:

Consistency with Forest Plan Standards, Goals, and Objectives

The NFMA requires that projects and activities be consistent with the governing Forest Plan (16 USC 1604(i)). The Lolo Forest Plan (1986) establishes management direction for the Lolo National Forest. This management direction is achieved through the establishment of Forest Plan goals and objectives, standards and guidelines, and management area goals and accompanying standards and guidelines.

This decision is consistent with the standards, goals and objectives of the Lolo Forest Plan (1986) as documented in the EA and associated resource reports in the project record.

Suitability for Timber Production

No timber harvest, other than salvage sales or sales to protect other multiple use values, shall occur on lands not suited for timber production [16 USC 1604 Sec.6 (k)].

Stands identified for harvest treatment in the project area were examined for suitability by a certified silviculturist, soil scientist, and other resource specialists. Harvest treatments are located in management areas (MAs) suitable for long-term timber production and/or where harvest is permitted as described in the Forest Plan.

Based on the analysis provided in the EA and project file, the vegetation treatments identified in these areas meet these objectives/standards. The silvicultural diagnosis process and the Forest Plan were used to determine that all areas identified for timber harvest are suitable.

Timber Harvest

All projects that involve timber harvest for any purpose must comply with four requirements found in 16 USC 1604 Sec.6 (g)(3)(E). I find that the prescribed treatments involving timber harvest shall only occur on lands where:

(i) Soil, slope, or other watershed conditions will not be irreversibly damaged.

The Forest Service fully assessed the potential effects of timber harvest on soil and water resources. The analysis is documented within the soil and aquatics sections of the EA and corresponding reports in the project record. The Selected Action avoids impairment of site productivity, water quality, and aquatic habitat. This determination is supported by disclosures in the above sections of the EA and the application of best management practices and resource protection measures to help prevent the loss of soil or reduction in water quality. The effectiveness of these measures is discussed in the EA sections 3.5, 2.6, 3.7, Appendix C, and project record. Field inventories and analysis verified that the selected treatments will meet Regional soil quality standards.

(ii) There is assurance that such lands can be adequately restocked within five years after harvest.

Within the project area, establishment of regeneration on past even-aged harvest units has successfully occurred within the five-year time frame or follow-up planting or other actions have been implemented, resulting in certifiably stocked stands. With this local history of successful regeneration and the results of a reforestation risk assessment for planned silvicultural treatments (Vegetation Specialist Report[21], Appendix 4 and 6), I am assured that treatments involving even-aged harvest will be restocked within the required time frame.

(iii) Protection is provided for streams, stream-banks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperature, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat.

Upon review of the EA, I find that the timber harvest activities associated with the Selected Action will comply with applicable Clean Water Act and Montana State water quality standards and Lolo Forest Plan standards. INFISH amended the Forest Plan by establishing RHCAs. Sediment delivery from the road construction and decommissioning within RHCAs will be well-mitigated with SOPs, and no harvest will occur within RHCAs (EA sections 3.6, 3.7, and 3.8.1 & Appendix C). Application of BMPs and stream buffers will protect water resources from harvest activities. Timber harvest will not adversely affect water conditions or fish habitat.

(iv) The harvesting system to be used is not selected primarily because it will give the greatest dollar return.

The purposes of the harvest treatments for this project are to reduce fuels accumulations, improve forest health and resiliency, improve public safety, and provide wood products to the local community. In treatment units prescribed for commercial timber harvest, generally the smaller understory or codominant trees will be removed and the larger, more disease- and fire-resistant trees will be left on site. Although economic feasibility is a consideration during project development, the existing and desired stand and landscape conditions drove the selection of harvest systems and not the potential for greatest dollar return. The analysis concluded that the project is economically feasible meaning that the commercial timber sale portion of the project is likely to sell given current market conditions (EA, section 3.14).

Clearcutting and Even-aged Management

When timber is to be harvested using an even-aged management system, a determination that the system is appropriate to meet the objectives and requirements of the Forest Plan must be made and, where clearcutting is to be used, must be determined to be the optimum method.

i. For clearcutting, it is determined to be the optimum method, and for other such cuts it is determined to be appropriate, to meet the objectives and requirements of the relevant land management plan. [16 USC 1604 Sec.6 (g)(3)(F)(i)]:

No clearcutting is prescribed. However, even-aged harvest treatments that are designed to create a new age class while retaining a patchy overstory of large trees will occur on approximately 682 acres. These methods have been determined to be appropriate to meet land management and project objectives.

[21] North Seeley WUI – HWY 83 Vegetation Report

Within the project, even-aged regeneration harvest treatments are prescribed for areas heavily impacted by mortality caused by bark beetles and/or root disease. I have determined that the silvicultural systems in the Selected Action are appropriate to meet the objectives and requirements of the Forest Plan.

ii. The interdisciplinary review as determined by the Secretary has been completed and the potential environmental, biological, esthetic, engineering, and economic impacts on each advertised sale area have been assessed, as well as the consistency of the sale with the multiple use of the general area. [16 USC 1604 Sec.6 (g)(3)(F)(ii)]:

Full interdisciplinary review has been completed for this project (refer to the EA and project record). All treatments meet a portion of the multiple use goals and objectives in the Lolo Forest Plan for designated management areas.

iii. Cut blocks, patches or strips are shaped and blended to the extent practicable with the natural terrain [16 USC 1604 Sec.6 (g)(3)(F)(iii)]:

Cutting units were designed to blend with the natural environment as much as possible and meet visual quality objectives.

iv. Cuts are carried out according to the maximum size limit required for areas to be cut during one harvest operation, provided, that such limits shall not apply to the size of areas harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm [FSM Region 1 supplement 2400-2001-2-2471.1, 16 USC 1604 Sec.6 (g)(3)(F)(iv)]:

Forest Service Manual 2470, Section 2471.1, Region 1 Supplement 2400-2016-1 generally limits the maximum opening size of harvest openings created by even-age silviculture systems in the Northern Region to 40 acres or less. However, when natural catastrophic events such as fire, windstorms, or insect and disease attacks have occurred, 40 acres may be exceeded (Forest Service Manual 2470, R1 Supplement 2400-2016-1). Treatment units that will result in openings greater than 40 acres are discussed in project's Vegetation Report[22]. These treatment units are supported by a silvicultural diagnosis and a detailed prescription will be written by a Certified Silviculturist. Notification that the project would result in openings in excess of 40 acres was included in the scoping letter, dated August 21, 2023, which included a map depicting proposed regeneration harvest units. This disclosure, with updated proposed openings, was repeated in the EA published in April 2025. As per FSM 2471.1, Regional Forester approval has been requested and granted[23].

v. Such cuts are carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource [16 USC 1604 Sec.6 (g)(3)(F)(v)]:

Documentation of the effects of harvesting on other resources is contained in the EA and project record. Protection of all resource values is maintained. All sites considered for treatment will use established harvest methods. Treatments are designed to sustain and perpetuate native seral

[22] North Seeley WUI – HWY 83 Vegetation Report
[23] Northern Region Request for Approval to Exceed Maximum Even-aged Regeneration Harvest Opening Size Limitations for the North Seeley WUI – Highway 83 Project. Regional Forester Approval Date 09/12/24. Public Notice Publication Date 08/21/2023.

species. Resource protection measures (Appendix C) and standard operating procedures (Appendix C) will be sufficient to protect soil and water resources. As stated above, regeneration of past even-aged harvest units within the project area has successfully occurred. With this local history of successful regeneration and the planned silvicultural treatments, I am assured that treatments involving even-aged harvest in the Selected Action will be restocked within the required time frame.

Transportation System

The Selected Action meets the intent of the NFMA road requirements.

Unless the necessity for a permanent road is set forth in the forest development road system plan, any road constructed on land of the National Forest System in connection with a timber contract or other permit or lease shall be designed with the goal of reestablishing vegetative cover on the roadway and areas where the vegetative cover has been disturbed by the construction of the road, within ten years after the termination of the contract, permit, or lease either through artificial or natural means. [16 USC 1608(b)]

As described in section 1, temporary roads constructed to access timber harvest units will be decommissioned after use for this project. The hillslope will be recontoured back to its original shape as much as possible. Grass-seed and slash will be placed on disturbed areas. Other forest vegetation will naturally re-establish on the former road prism. Therefore, temporary roads will be revegetated within ten years after termination of the timber sale contract(s).

Roads constructed on National Forest System lands shall be designed to standards appropriate for the intended uses, considering safety, cost of transportation, and impacts on land and resources. [16 USC 1608(c)]

New system roads will be constructed to design standards to provide for safety and minimize potential environmental impacts. The location, design, and construction of these roads will follow standard operating procedures to minimize potential environmental impacts. Newly constructed roads will be closed to public motorized use yearlong. Temporary roads will be located in mid to upper slope locations, will not cross mapped intermittent or perennial streams, and will be decommissioned after use for this project.

Maintenance activities on existing roads will occur to ensure adequate road surface for vegetation treatment haul truck transportation. Some roads are in existing good condition and will need minimal maintenance to be used as haul routes. Other proposed haul routes are nearly naturally decommissioned and will require reconstruction prior to use.

The EA discloses that newly constructed permanent roads, temporary roads, and maintenance on existing roads will have limited effects on soils, water quality, fisheries, or aquatic habitat (EA, sections 3.5, 3.6, 3.7, 3.8.1). Applied RPMs and SOPs will minimize erosion and sediment risk (Appendix C). Yearlong closure of these roads to public motorized use will minimize potential disturbance to wildlife (EA, sections 3.8 and 3.9).

Sensitive Species

Federal law and direction applicable to sensitive species include the NFMA and the Forest Service Manual (2670). NFMA directs that guidelines for land management plans provide for diversity of plant and animal communities based on the suitability and capability of the specific

land area in order to meet overall multiple-use objectives [16 USC 1604 Sec.6 (g)(3)(B)]. The Lolo Forest Plan contains standards for sensitive species. The Regional Forester has approved the sensitive species list - those plants and animals for which population viability is a concern (FSM 2670.5).

In making my decision, I have reviewed the analysis and projected effects on all sensitive species listed as occurring or possibly occurring on the Lolo National Forest (biological evaluations[24,25,26] in the project record). I acknowledge the findings, which document that the Selected Action will not lead to a loss of species viability or contribute to a trend toward federal listing.

Clean Water Act and State Water Quality Standards

Activities associated with the Selected Action will comply with applicable Clean Water Act and Montana State water quality standards through application of best management practices. Prior to implementation, all necessary permits will be acquired. An in-depth discussion of the effects on aquatic resources can be found in the hydrology[27] and fisheries[28] reports in the project record, which are summarized in the aquatics (3.7) and fisheries (3.8.1) sections of the EA.

Clean Air Act

Prescribed burning activities will be coordinated to meet the requirements of the State Implementation Plans, Smoke Management Plan, and Federal air quality requirements (Appendix C).

Endangered Species Act

Under provisions of the Endangered Species Act of 1973, Federal agencies are directed to seek to conserve endangered and threatened species and to ensure that actions are not likely to jeopardize the continued existence of any of these species. Pursuant to Section 7 of the Act, biological assessments were prepared, which disclose effects of the project on listed aquatic, wildlife, and plant species. The LNF requested formal consultation and provided biological assessments in January 2025 to the FWS; the FWS provided a response and biological opinion June 18, 2025[29]. Specifically, the biological assessments addressed grizzly bear (*Ursus arctos horribilis*), Canada lynx (*Lynx canadensis*), designated Canada lynx critical habitat, North American wolverine (*Gulo gulo luscus*), bull trout (*Salvelinus confluentus*), designated bull trout critical habitat, yellow-billed cuckoo (*Coccyzus americanus*), and whitebark pine (*Pinus albicaulis*). Proposed species monarch butterfly (*Danaus plexippus*) and Suckely's cuckoo bumble bee (*Bombus suckleyi*) were also analyzed. As described in the No Effect Biological Assessment[30], it was determined the project will have no effect on yellow-billed cuckoo and whitebark pine. Written concurrence from the FWS with no effect determinations is not required by the Endangered Species Act. The No

[24] North Seeley Wildland Urban Interface – Highway 83 Project Specialist's Report and Biological Evaluation Rare Plants and Invasive Plants
[25] North Seeley Wildland Urban Interface – Highway 83 Project Fisheries Analysis
[26] North Seeley Wildland Urban Interface – Highway 83 Project Wildlife Report for Terrestrial Wildlife
[27] North Seeley Wildland Urban Interface - Highway 83 Project Hydrology Resource Report
[28] North Seeley Wildland Urban Interface – Highway 83 Project Fisheries Analysis
[29] USFWS. 2025. Concurrence letter and Biological Opinion. Montana Ecological Services Office. Ecosphere Number: 2024-0091165
[30] North Seeley Wildland Urban Interface – Highway 83 Project Biological Assessment- No Effect

Effect Biological Assessment also determined, with FWS concurrence, that the project is not likely to jeopardize the proposed monarch butterfly or Suckley's cuckoo bumble bee.

As described in the terrestrial wildlife, wolverine, and fisheries biological assessments[31,32] and summarized in Section 3.8 of the EA, the Forest determined the Selected Action:

- *may affect, is not likely to adversely affect* bull trout and bull trout critical habitat,
- *may affect, is not likely to adversely affect* North American wolverine,
- *may affect, is likely to adversely affect* grizzly bear,
- *may affect, is likely to adversely affect* Canada lynx, and
- *may affect, is likely to adversely modify* Canada lynx critical habitat.

The FWS reviewed the biological assessments and concurred with the above determinations for bull trout, bull trout critical habitat, and North American wolverine.

The FWS issued a biological opinion that the project is *not likely to jeopardize* the continued existence of Canada lynx and is *not likely to result in destruction or adverse modifications of critical habitat* of Canada lynx. The FWS believes that the project design, in accordance with the regulatory framework of the Forest Plan, reduces the potential for, and minimizes the effect of, incidental take of lynx. Therefore, FWS does not require additional reasonable and prudent measures to minimize the impacts of incidental take of lynx. Because there are no reasonable and prudent measures, there are no terms and conditions of this incidental take statement.

The FWS issued a biological opinion that the project is *not likely to jeopardize* the continued existence of grizzly bear. The FWS found that other than the existing motorized access conditions and effects to secure habitat, no activities under the Selected Action are likely to adversely affect grizzly bears. The adverse effects related to the existing, ongoing access conditions, temporary road construction and use, and temporary use of restricted roads were adequately analyzed in the 2023 programmatic biological opinion[33] and the Selected Actions related to motorized access conform to the ITS as amended associated with the FWS opinion. The FWS finding is based on: (1) the baseline access condition falls within the scope of the 2023 programmatic biological opinion, (2) the effects related to motorized access are consistent with those anticipated and analyzed in the 2023 programmatic biological opinion, (3) the amount of incidental take anticipated in the incidental take statement (as amended) will not be exceeded, and (4) the Selected Action adheres to the appropriate terms and conditions associated with the reasonable and prudent measures identified in the 2023 incidental take statement. Thus, the Selected Action is consistent with the 2023 programmatic biological opinion and its incidental take statement. The 2023 programmatic biological opinion provided reasonable and prudent measures and terms and conditions to minimize the potential for incidental take, which I have incorporated into my decision (Appendix E).

[31] North Seeley Wildland Urban Interface – Highway 83 Project Wildlife Report for Terrestrial Wildlife
[32] North Seeley Wildland Urban Interface – Highway 83 Project Fisheries Analysis
[33] U.S. Fish and Wildlife Service 2023. Biological opinion on the effects of the Lolo National Forest Plan on grizzly bears as amended August 11, 2023 via letter

National Historic Preservation Act, American Indian Religious Freedom Act, and Native American Graves Protection and Repatriation Act

The Selected Action will not have a significant adverse effect on cultural sites in or eligible for listing in the National Register of Historic places because there are no known recorded cultural sites near the project area. If unknown cultural resources sites are discovered during implementation, all work will stop in the immediate vicinity of the site (Appendix C). Therefore, there is minimal risk of additional incremental degradation of the cultural properties associated with the Selected Action. This project is in compliance with the National Historic Preservation Act (see documentation in project record).

The Forest Service consulted with the Confederated Salish and Kootenai Tribes of the Flathead Nation and the Nez Perce tribe during the analysis process. The intent of this consultation has been to remain informed about Tribal concerns regarding the American Indian Religious Freedom Act (AIRFA) and other tribal issues.

Travel Management Rule (36 CFR 212, Subpart A)

In 2015, pursuant to 36 CFR 212.5(b)(2), the Lolo National Forest completed a forest-wide travel analysis to identify roads that are no longer needed to meet forest resource management objectives. This analysis, a previous travel analysis conducted for this area, and a project-specific travel analysis informed the road-related actions (i.e. new road construction, addition of undetermined roads to the National Forest System, road storage, and decommissioning) included in this decision (EA section 2.2.2).

The Selected Action includes the construction of 14 miles of new permanent roads and 5 miles of temporary road, and the adoption of 96 miles of undetermined roads to the National Forest System (storing 20 miles) to address immediate and long-term access needs. Management benefits, environmental effects, and future maintenance obligations of these new roads have been considered by the resource specialist (see EA, Ch. 3 and resource reports). Road design standards which include relatively gentle grades and application of best management practice measures, road location that avoids sensitive soils in mid to upper slope locations, and yearlong closure to public motorized use will minimize adverse environmental effects, the frequency of future maintenance needs, and future maintenance costs.

The Selected Action also includes decommissioning of 154 miles of roads (5 miles of National Forest System and 149 miles of undetermined roads) that are not needed.

The analysis contained within the resource reports in the project record and summarized in the EA (chapter 3) discloses that these new roads and road decommissioning will not have significant effects on the environment, including associated ecosystems, endangered and threatened species, cultural resources, fish and wildlife habitat, and visual quality.

I find that the project is consistent with agency regulations and direction related to road and transportation management.

7. Emergency Action Determination (EAD)

The North Seeley WUI – Highway 83 project is an authorized emergency action per direction from the Secretary of Agriculture. The Secretary in January 2023 invoked the emergency authority provided in section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58) across 250 high-risk firesheds. The project lies within 278 Condon and 341 Barite, identified among the 250 High Risk Firesheds. The selected actions of this project have been reviewed and approved by the Chief of the U.S. Forest Service.

Section 40807 of the Infrastructure Investment and Jobs Act requires the opportunity for public comment during the preparation of an environmental assessment for authorized emergency actions. Actions under this section are not subject to the objection process and a court shall not enjoin an authorized emergency action under this section if the court determines that the plaintiff is unable to demonstrate that the claim of the plaintiff is likely to succeed on the merits.

With EAD approved for the Project, the 30-day EA comment period was the last official public comment period for the project. The EA was made available to the public during the 30-day comment period in April-May of 2025. The April 2025 EA cover letter notified the public that the project was approved for EAD. Chapter 1 of the EA also provides additional information related to the project being approved for EAD and was available during the 30-day public comment period.

This project appropriately follows the emergency authorities per direction of the Secretary and as provided by Congress.

Implementation can begin immediately.

Further information about this decision can be obtained from Jeremy Casterson, Deputy Forest Supervisor. Contact information is included on the cover page of this document.

_____ _____

BENJAMIN JOHNSON Date
Forest Supervisor

APPENDIX A. Maps of the Selected Action

Map 1. Vicinity map of the North Seeley Wildlife-Urban Interface – Highway 83 Project

Map 2. Selected Action Vegetation Treatments, Area 1 of 3

Map 3. Selected Action Vegetation Treatments, Area 2 of 3

Map 4. Selected Action Vegetation Treatments, Area 3 of 3

Map 5. Selected Action Transportation Management Activities, Area 1 of 5

Map 6. Selected Action Transportation Management Activities, Area 2 of 5

Map 7. Selected Action Transportation Management Activities, Area 3 of 5

Map 8. Selected Action Transportation Management Activities, Area 4 of 5

Map 9. Selected Action Transportation Management Activities, Area 5 of 5

Map 10. Selected Action Recreation Updates

Map 1. Vicinity map of the North Seeley Wildlife-Urban Interface – Highway 83 Project

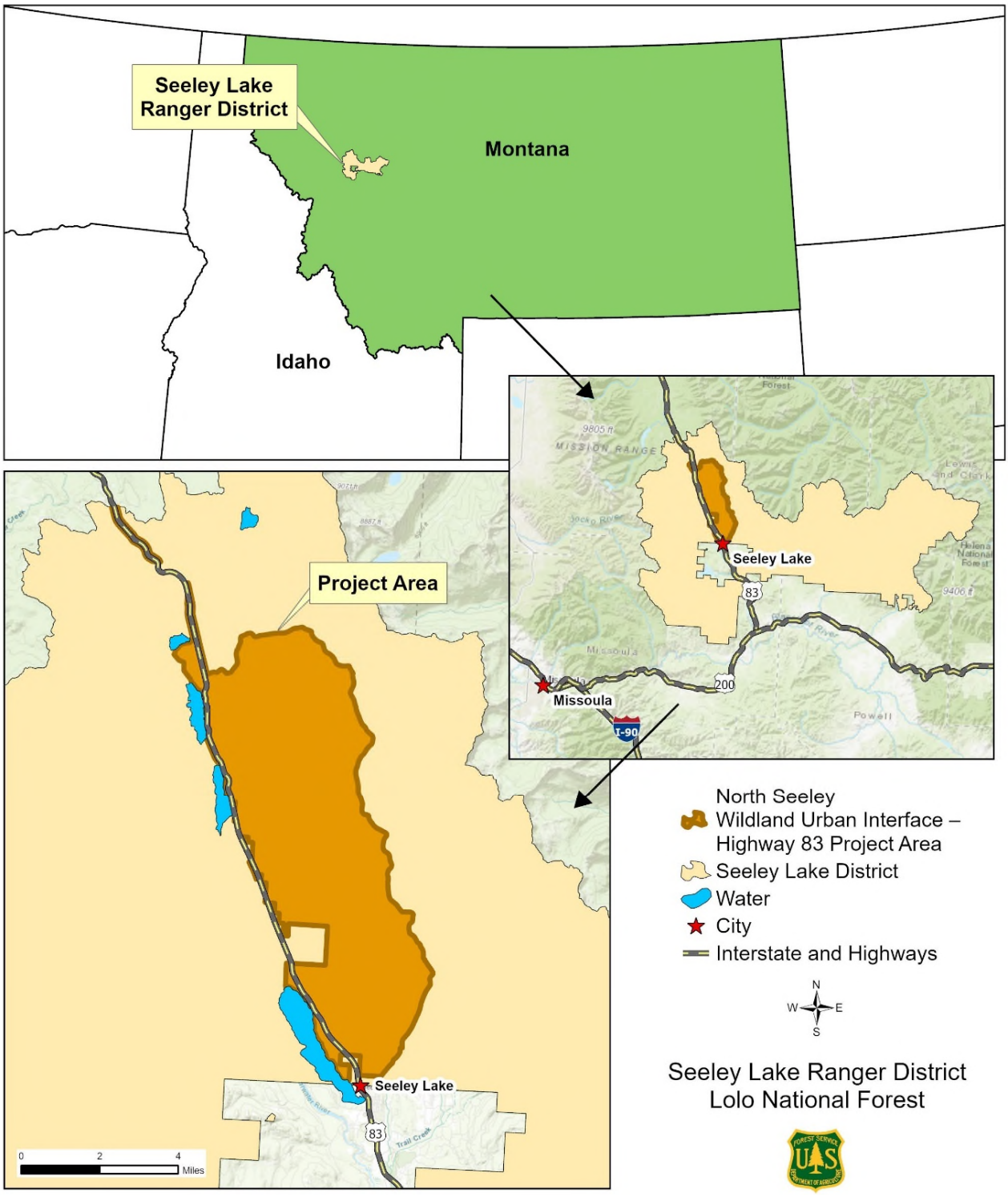
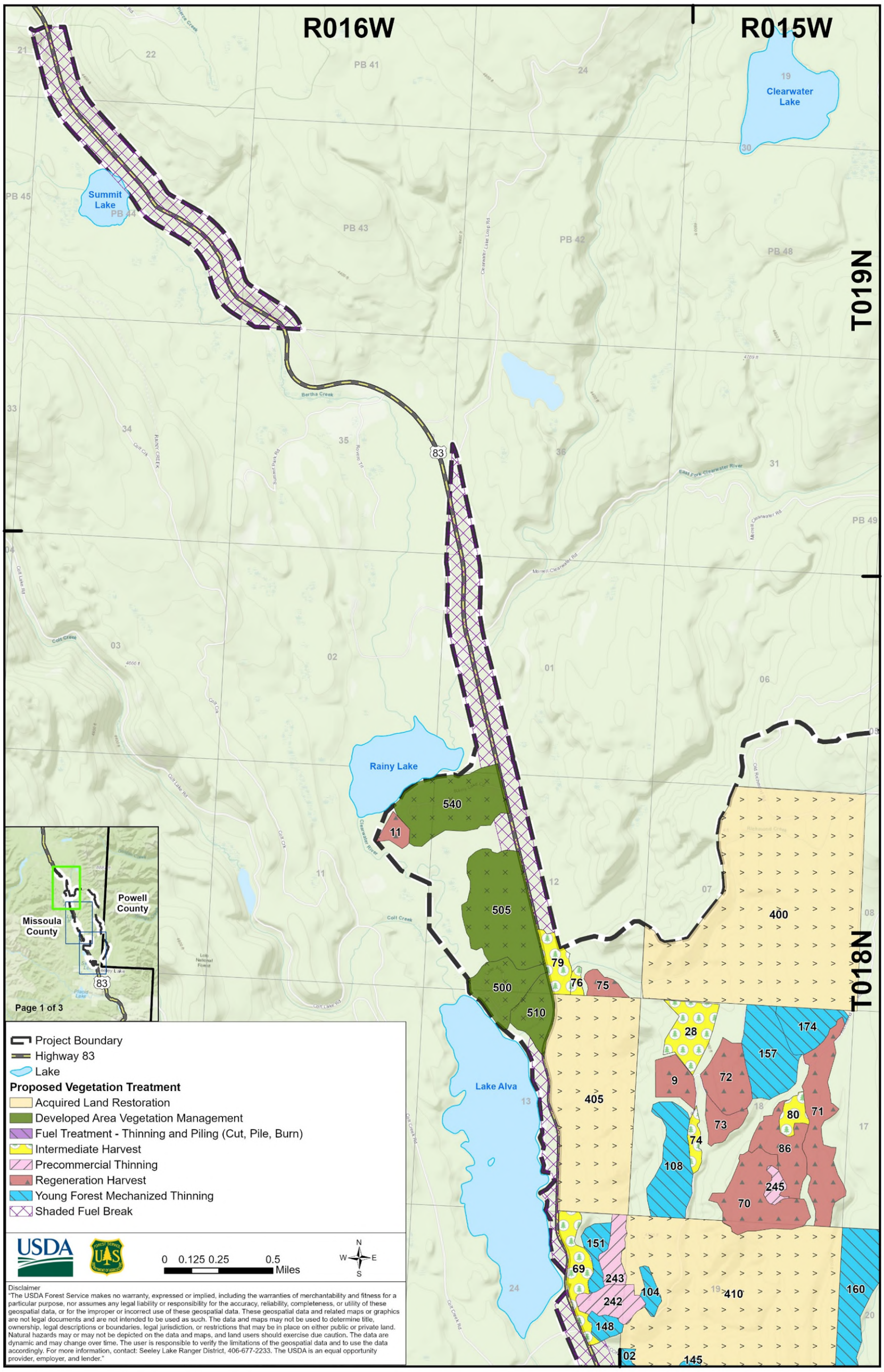
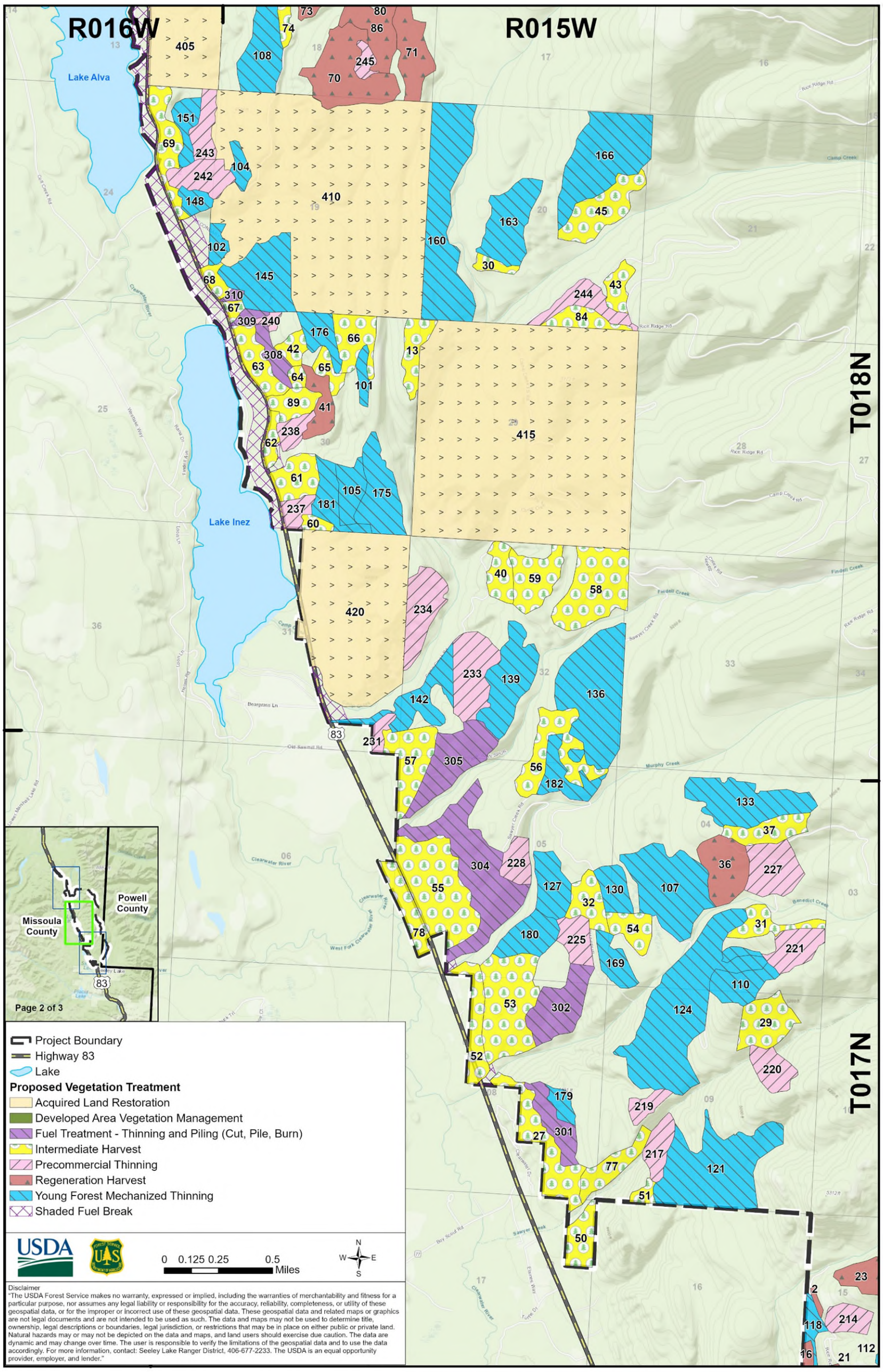


Figure 1. Vicinity map of the North Seeley Wildland-Urban Interface – Highway 83 Project.

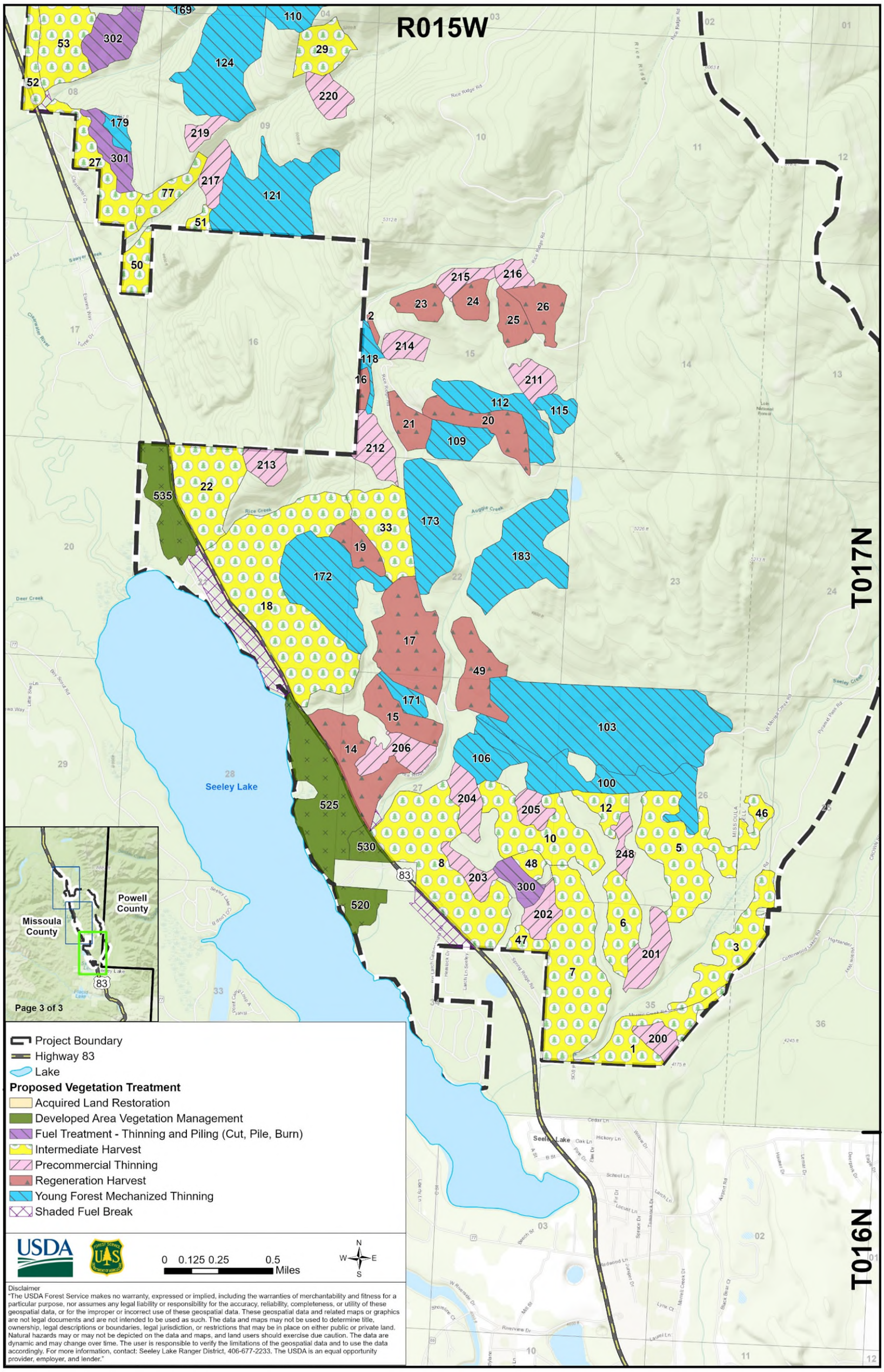
Map 2. Selected Action Vegetation Treatments, Area 1 of 3



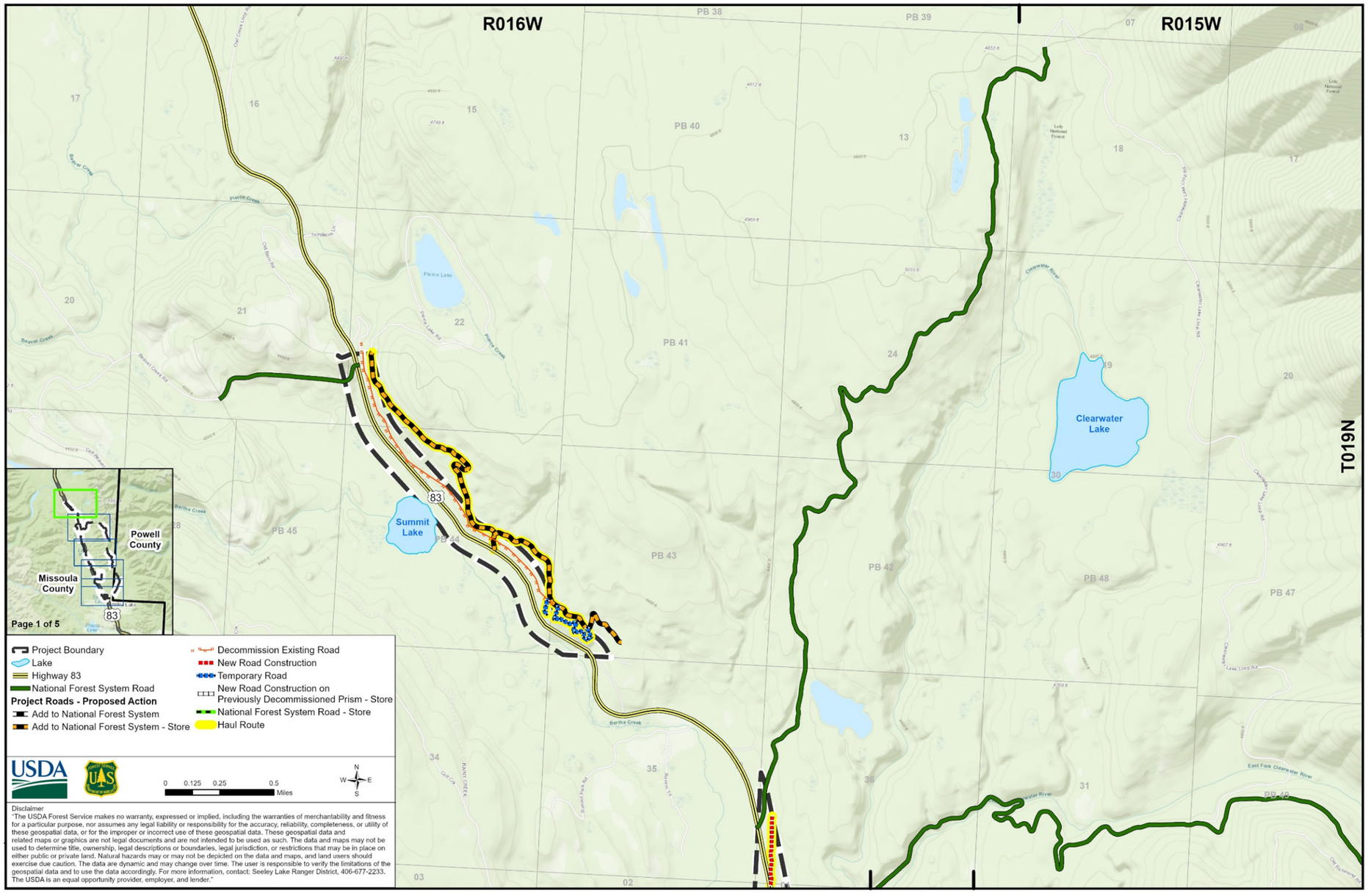
Map 3. Selected Action Vegetation Treatments, Area 2 of 3



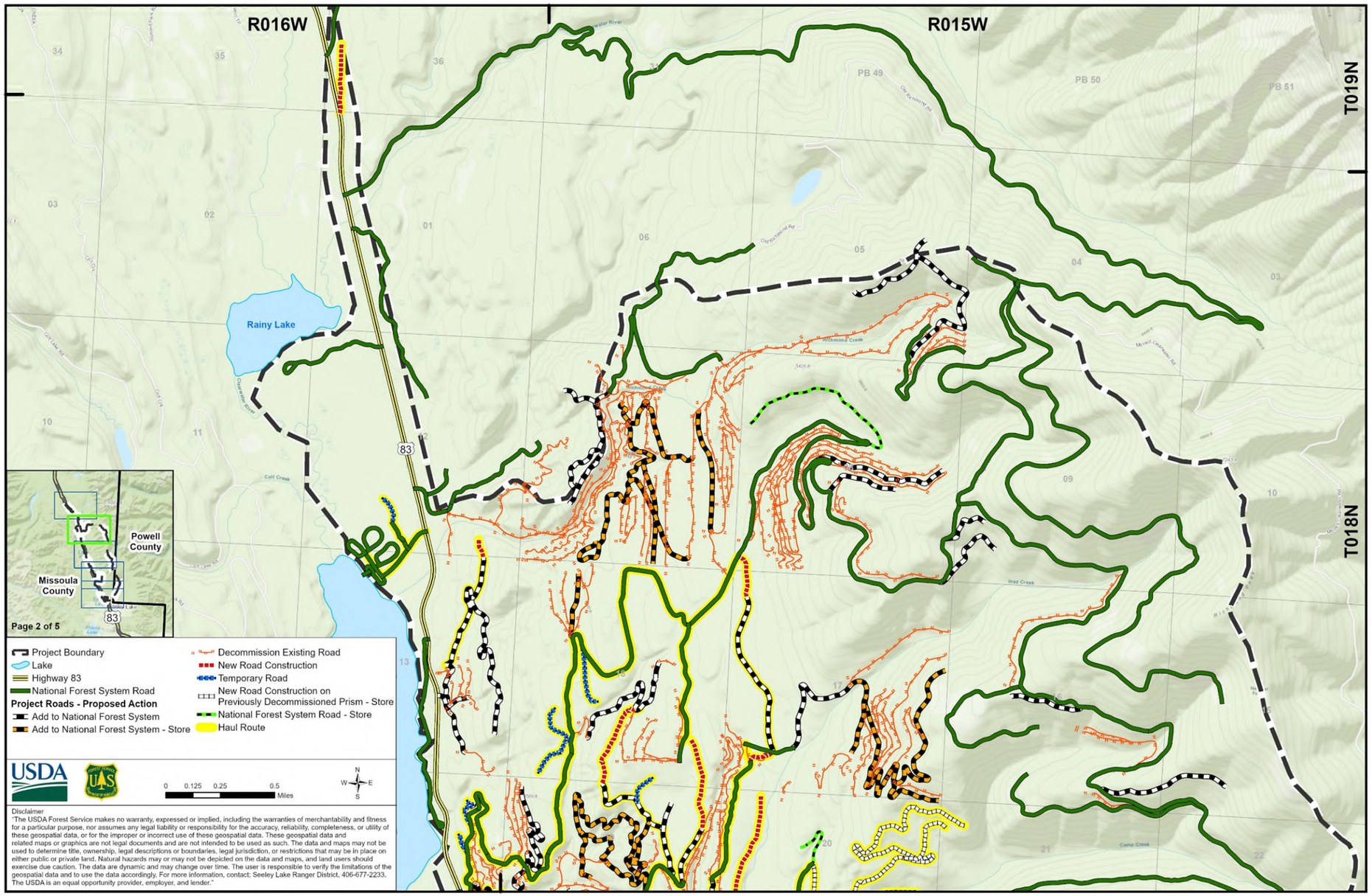
Map 4. Selected Action Vegetation Treatments, Area 3 of 3



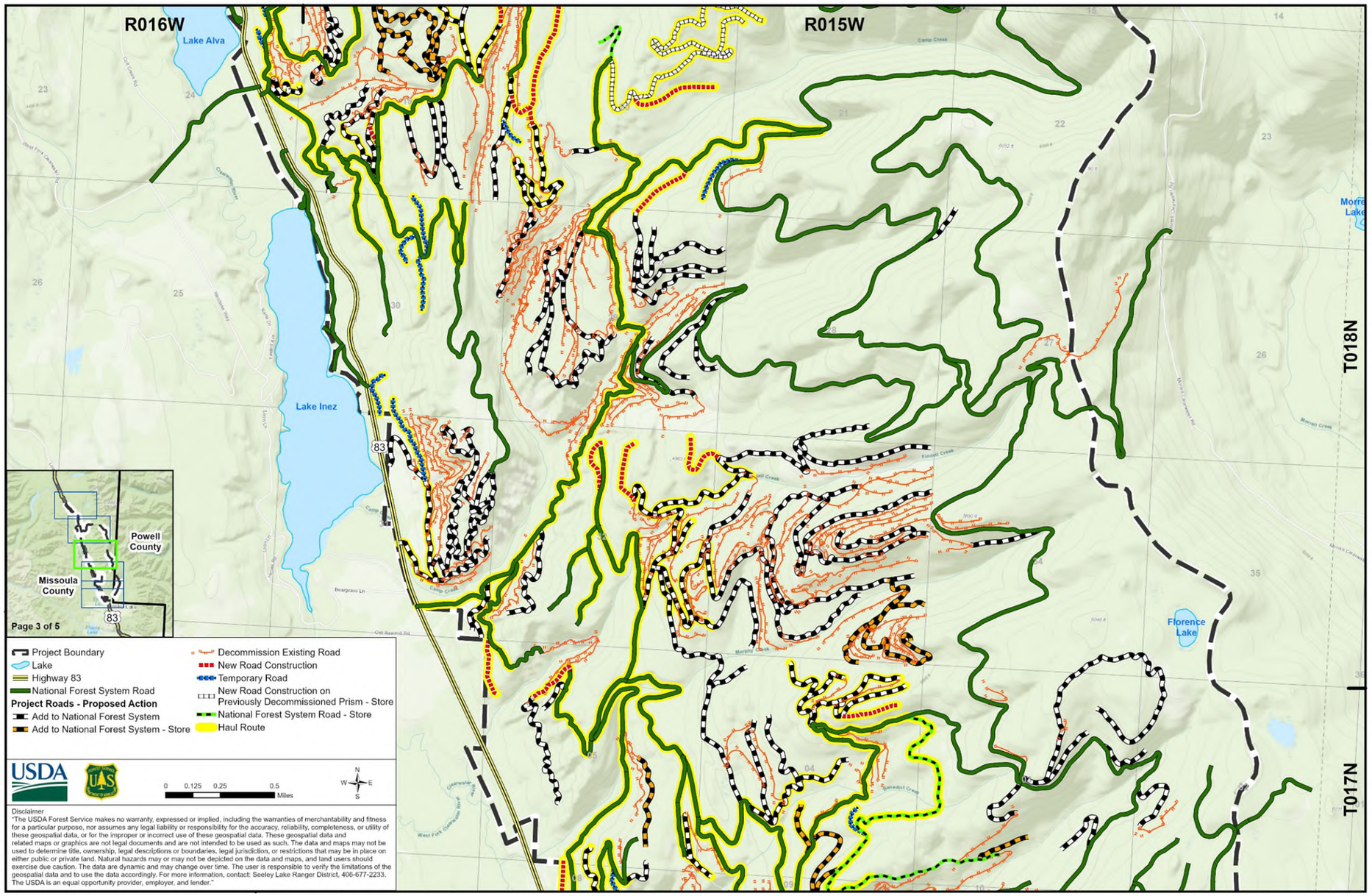
Map 5. Selected Action Transportation Management Activities, Area 1 of 5



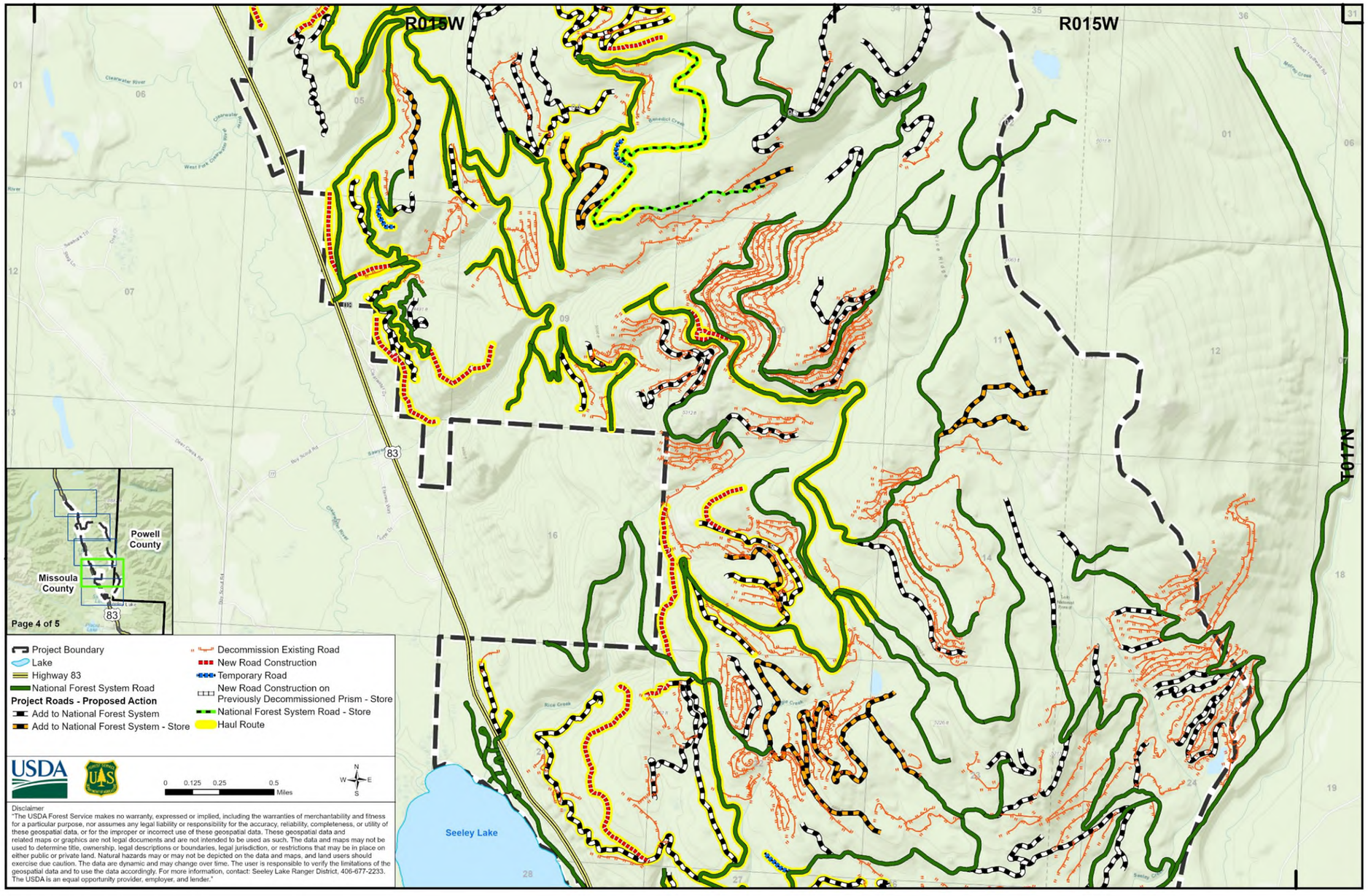
Map 6. Selected Action Transportation Management Activities, Area 2 of 5



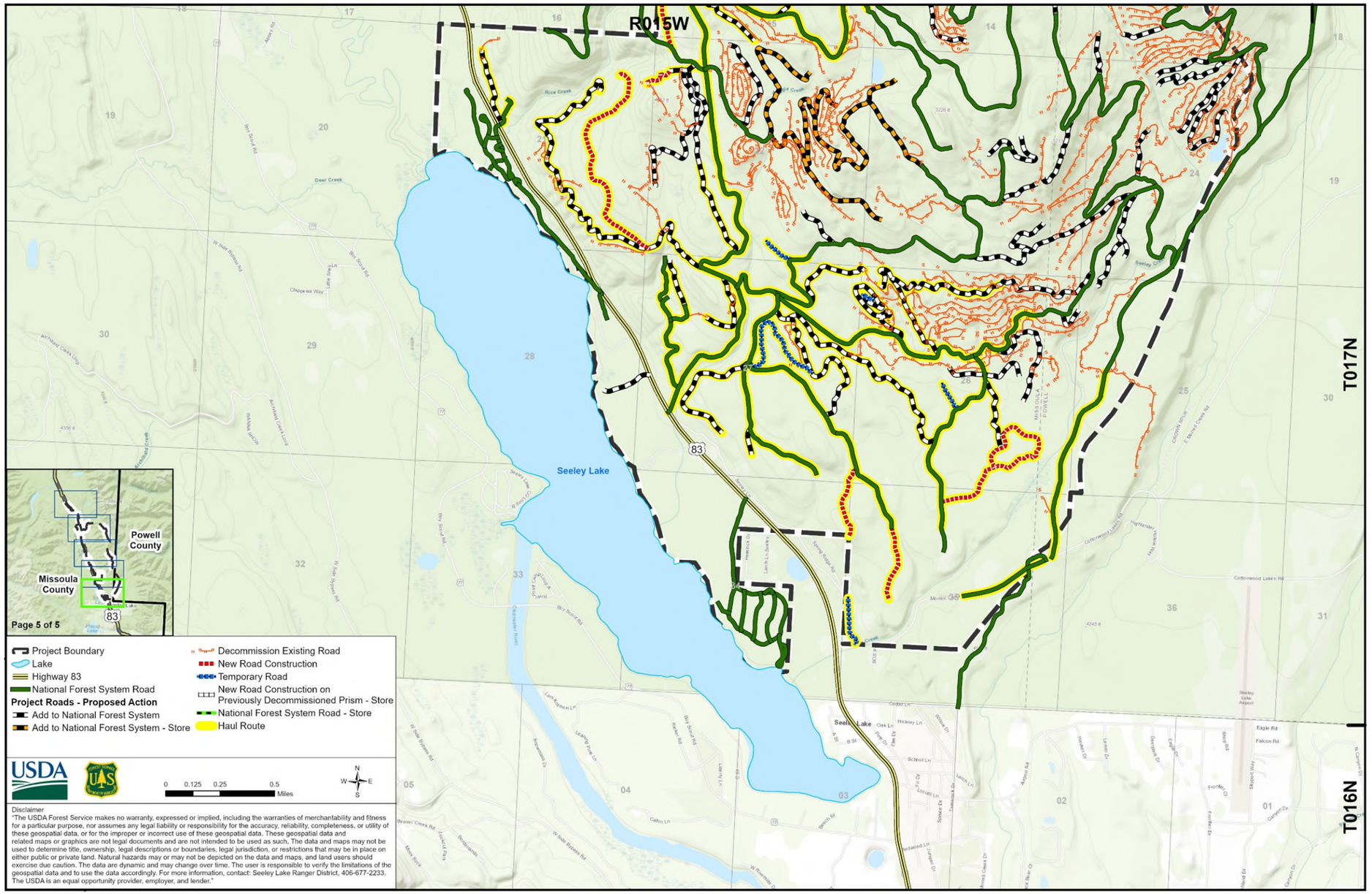
Map 7. Selected Action Transportation Management Activities, Area 3 of 5



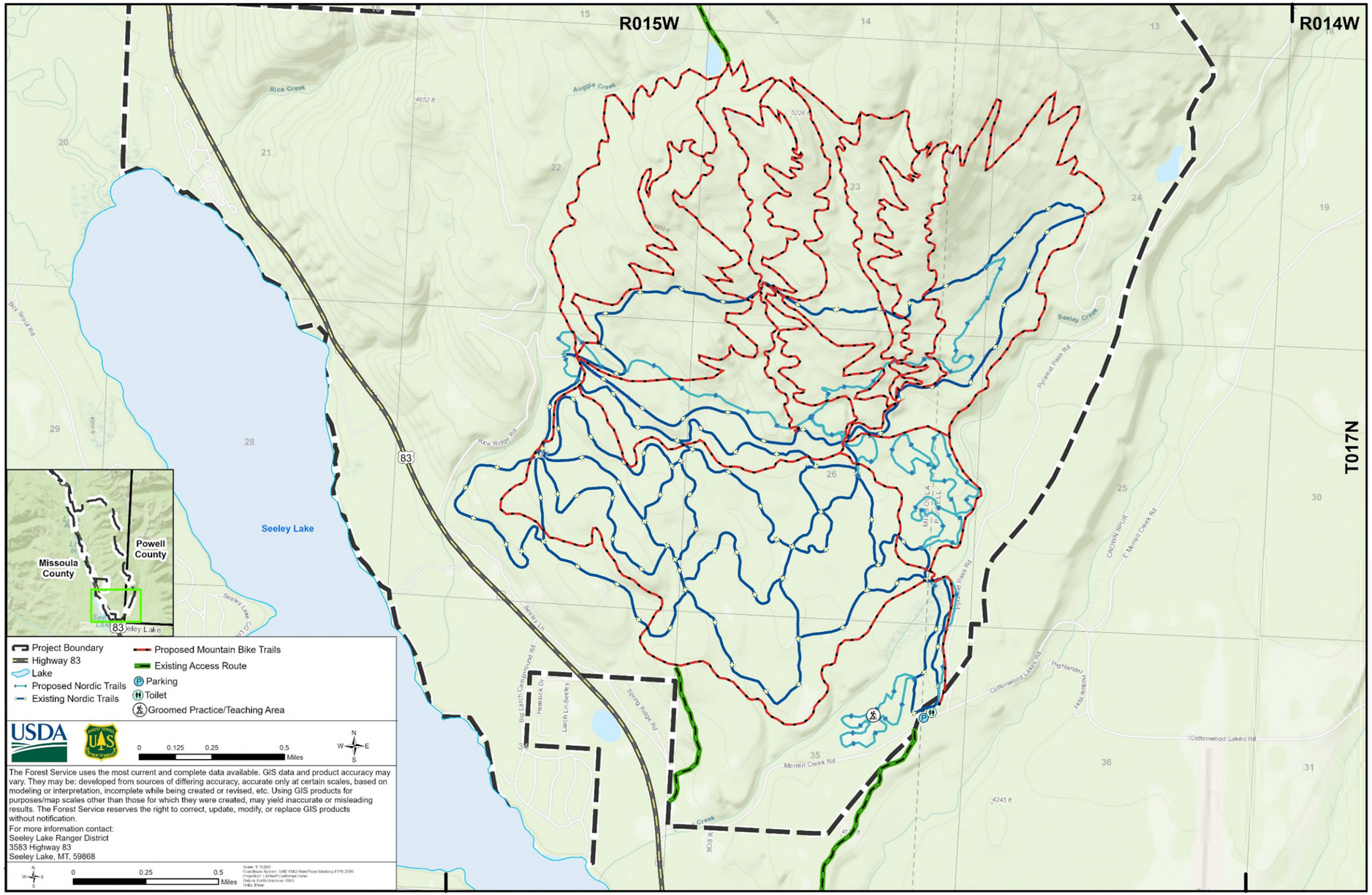
Map 8. Selected Action Transportation Management Activities, Area 4 of 5



Map 9. Selected Action Transportation Management Activities, Area 5 of 5



Map 10. Proposed Recreation Updates



APPENDIX B. Details of the Selected Action

Table B-1. Selected Action Vegetation Treatment Areas

Unit Number	Acres	Treatment Type	Logging System*
1	44	Intermediate Harvest	Tractor
2	2	Regeneration Harvest	Tractor
3	53	Intermediate Harvest	Tractor
5	90	Intermediate Harvest	Tractor
6	37	Intermediate Harvest	Tractor
7	123	Intermediate Harvest	Tractor
8	131	Intermediate Harvest	Tractor
9	21	Regeneration Harvest	Tractor
10	70	Intermediate Harvest	Tractor
11	9	Regeneration Harvest	Tractor
12	17	Intermediate Harvest	Tractor
13	20	Intermediate Harvest	Tractor
14	54	Regeneration Harvest	Tractor
15	31	Regeneration Harvest	Tractor
16	5	Regeneration Harvest	Tractor
17	82	Regeneration Harvest	Tractor
18	202	Intermediate Harvest	Tractor and Skyline
19	20	Regeneration Harvest	Tractor
20	38	Regeneration Harvest	Tractor
21	21	Regeneration Harvest	Tractor
22	73	Intermediate Harvest	Tractor
23	19	Regeneration Harvest	Tractor and Skyline
24	17	Regeneration Harvest	Tractor
25	19	Regeneration Harvest	Tractor
26	28	Regeneration Harvest	Tractor
27	43	Intermediate Harvest	Tractor
28	34	Intermediate Harvest	Tractor
29	32	Intermediate Harvest	Tractor and Skyline
30	7	Intermediate Harvest	Tractor
31	18	Intermediate Harvest	Tractor
32	21	Intermediate Harvest	Tractor
33	55	Intermediate Harvest	Tractor
36	36	Regeneration Harvest	Tractor
37	23	Intermediate Harvest	Tractor and Skyline
40	18	Intermediate Harvest	Skyline
41	19	Regeneration Harvest	Skyline

Unit Number	Acres	Treatment Type	Logging System*
42	10	Intermediate Harvest	Tractor
43	13	Intermediate Harvest	Skyline
45	38	Intermediate Harvest	Skyline
46	15	Intermediate Harvest	Tractor
47	9	Intermediate Harvest	Tractor
48	9	Intermediate Harvest	Tractor
49	43	Regeneration Harvest	Tractor
50	20	Intermediate Harvest	Tractor
51	5	Intermediate Harvest	Tractor
52	26	Intermediate Harvest	Tractor
53	69	Intermediate Harvest	Tractor
54	18	Intermediate Harvest	Tractor
55	77	Intermediate Harvest	Tractor
56	43	Intermediate Harvest	Tractor
57	36	Intermediate Harvest	Tractor
58	61	Intermediate Harvest	Tractor
59	32	Intermediate Harvest	Tractor
60	5	Intermediate Harvest	Tractor
61	24	Intermediate Harvest	Tractor
62	9	Intermediate Harvest	Tractor
63	23	Intermediate Harvest	Tractor
64	5	Intermediate Harvest	Tractor
65	10	Intermediate Harvest	Tractor
66	27	Intermediate Harvest	Tractor
67	4	Intermediate Harvest	Tractor
68	8	Intermediate Harvest	Tractor
69	30	Intermediate Harvest	Tractor
70	61	Regeneration Harvest	Tractor
71	66	Regeneration Harvest	Tractor
72	36	Regeneration Harvest	Tractor
73	15	Regeneration Harvest	Tractor
74	9	Intermediate Harvest	Tractor
75	10	Regeneration Harvest	Tractor
76	4	Intermediate Harvest	Tractor
77	22	Intermediate Harvest	Skyline
78	21	Intermediate Harvest	Tractor
79	18	Intermediate Harvest	Tractor
80	11	Intermediate Harvest	Tractor
84	16	Intermediate Harvest	Tractor
86	31	Regeneration Harvest	Tractor

Unit Number	Acres	Treatment Type	Logging System*
89	16	Intermediate Harvest	Tractor
100	80	Young Forest Mechanized Thinning	Tractor
101	8	Young Forest Mechanized Thinning	Tractor
102	9	Young Forest Mechanized Thinning	Tractor
103	226	Young Forest Mechanized Thinning	Tractor
104	9	Young Forest Mechanized Thinning	Tractor
105	19	Young Forest Mechanized Thinning	Tractor
106	26	Young Forest Mechanized Thinning	Tractor
107	73	Young Forest Mechanized Thinning	Tractor
108	51	Young Forest Mechanized Thinning	Tractor
109	26	Young Forest Mechanized Thinning	Tractor
110	29	Young Forest Mechanized Thinning	Tractor
112	45	Young Forest Mechanized Thinning	Tractor
115	14	Young Forest Mechanized Thinning	Tractor
118	11	Young Forest Mechanized Thinning	Tractor
121	100	Young Forest Mechanized Thinning	Tractor
124	137	Young Forest Mechanized Thinning	Tractor
127	26	Young Forest Mechanized Thinning	Tractor
130	18	Young Forest Mechanized Thinning	Tractor
133	57	Young Forest Mechanized Thinning	Tractor
136	94	Young Forest Mechanized Thinning	Tractor
139	49	Young Forest Mechanized Thinning	Tractor
142	35	Young Forest Mechanized Thinning	Tractor
145	53	Young Forest Mechanized Thinning	Tractor and Skyline
148	9	Young Forest Mechanized Thinning	Tractor
151	16	Young Forest Mechanized Thinning	Tractor
157	53	Young Forest Mechanized Thinning	Tractor
160	106	Young Forest Mechanized Thinning	Tractor
163	45	Young Forest Mechanized Thinning	Tractor
166	83	Young Forest Mechanized Thinning	Tractor
169	18	Young Forest Mechanized Thinning	Tractor
171	12	Young Forest Mechanized Thinning	Tractor
172	92	Young Forest Mechanized Thinning	Tractor
173	72	Young Forest Mechanized Thinning	Tractor
174	29	Young Forest Mechanized Thinning	Tractor
175	41	Young Forest Mechanized Thinning	Tractor
176	19	Young Forest Mechanized Thinning	Tractor
179	31	Young Forest Mechanized Thinning	Tractor
180	26	Young Forest Mechanized Thinning	Tractor
181	22	Young Forest Mechanized Thinning	Tractor

Unit Number	Acres	Treatment Type	Logging System*
182	26	Young Forest Mechanized Thinning	Tractor
183	91	Young Forest Mechanized Thinning	Tractor
200	14	Precommercial Thinning	Tractor
201	27	Precommercial Thinning	Tractor
202	18	Precommercial Thinning	Tractor
203	17	Precommercial Thinning	Tractor
204	23	Precommercial Thinning	Tractor
205	14	Precommercial Thinning	Tractor
206	27	Precommercial Thinning	Tractor
211	18	Precommercial Thinning	Tractor
212	26	Precommercial Thinning	Tractor
213	17	Precommercial Thinning	Tractor
214	16	Precommercial Thinning	Tractor
215	13	Precommercial Thinning	Tractor
216	12	Precommercial Thinning	Tractor
217	17	Precommercial Thinning	Tractor
219	10	Precommercial Thinning	Tractor
220	20	Precommercial Thinning	Tractor
221	24	Precommercial Thinning	Tractor
225	18	Precommercial Thinning	Tractor
227	35	Precommercial Thinning	Tractor
228	16	Precommercial Thinning	Tractor
231	7	Precommercial Thinning	Tractor
233	42	Precommercial Thinning	Tractor
234	36	Precommercial Thinning	Tractor
237	11	Precommercial Thinning	Tractor
238	11	Precommercial Thinning	Tractor
240	4	Precommercial Thinning	Tractor
242	24	Precommercial Thinning	Tractor
243	18	Precommercial Thinning	Tractor
244	24	Precommercial Thinning	Tractor
245	7	Precommercial Thinning	Tractor
248	11	Precommercial Thinning	Tractor
300	17	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
301	31	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
302	40	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
304	90	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
305	48	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
308	13	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
309	5	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor

Unit Number	Acres	Treatment Type	Logging System*
310	3	Fuel Treatment - Thinning and Piling (Cut, Pile, Burn)	Tractor
400	489	Acquired Land Restoration	Tractor
405	239	Acquired Land Restoration	Tractor
410	542	Acquired Land Restoration	Tractor
415	647	Acquired Land Restoration	Tractor
420	230	Acquired Land Restoration	Tractor
500	39	Developed Area Vegetation Management	Tractor
505	97	Developed Area Vegetation Management	Tractor
510	28	Developed Area Vegetation Management	Tractor
520	21	Developed Area Vegetation Management	Tractor
525	93	Developed Area Vegetation Management	Tractor
530	14	Developed Area Vegetation Management	Tractor
535	45	Developed Area Vegetation Management	Tractor
540	79	Developed Area Vegetation Management	Tractor
SFB-1	539	Shaded Fuel Break	Tractor

* Equipment reflects the primary yarding system. Units may contain incidental areas that would require another type of equipment.

Table B-2. Summary of Treatments Resulting in Forest Openings Greater than 40 Acres^

Unit(s)	Acres	Existing and Desired Condition
72, 73	51	Existing Condition: Large dominant and co-dominant western larch with some co-dominant Douglas-fir experiencing Douglas-fir beetle mortality within the stand and causing heavy down woody debris and large fuel concentrations. True fir is found within the mid-and sub-canopy of the stand(s) and is experiencing heavy mortality from suppression and various pathogens adding heavy fuels loads in an abundance of acres. Also, dense lodgepole pine pockets exist in the understory with a lack of western larch recruitment. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stand for recruitment of western larch to most practical extent. Long-term fire resiliency within the area is the goal and ponderosa pine will also be emphasized for retention within these stands where applicable and it exists.
70, 71, 86	158	Existing Condition: Large dominant and co-dominant western larch with some co-dominant Douglas-fir experiencing Douglas-fir beetle mortality within the stand and causing heavy down woody debris and large fuel concentrations. True fir is found within the mid-and sub-canopy of the stand(s) and is experiencing heavy mortality from suppression and various pathogens adding heavy fuels loads in an abundance of acres. Also, dense lodgepole pine pockets exist in the understory with a lack of western larch recruitment. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stand for recruitment of western larch to most practical extent. Long-term fire resiliency within the area is the goal and ponderosa pine will also be emphasized for retention within these stands where applicable and it exists.
25, 26	47	Existing Condition: Dense stands of Douglas-fir and western larch overstory with heavy lodgepole pine and Douglas-fir understory. Douglas-fir beetle is causing mortality throughout the stands in 10 inch plus Douglas-fir within the stand. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stands for recruitment of western larch. This will reduce fuels, provide safe ingress and egress adjacent to Highway 83, and enable the areas to obtain long-term fire resiliency. Ponderosa dominant trees found within the units will also be maintained to emphasize recruitment where it exists.
20, 21	59	Existing Condition: Dense stands of Douglas-fir and western larch overstory with heavy lodgepole pine and Douglas-fir understory. Douglas-fir beetle is causing mortality throughout the stands in 10 inch plus Douglas-fir within the stand. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stands for recruitment of western larch. This will reduce fuels, provide safe ingress and egress adjacent to Highway 83, and enable the areas to obtain long-term fire resiliency. Ponderosa dominant trees found within the units will also be maintained to emphasize recruitment where it exists.
17	82	Existing Condition: Dense stands of Douglas-fir and western larch overstory with heavy lodgepole pine and Douglas-fir understory. Douglas-fir beetle is causing mortality throughout the stands in 10 inch plus Douglas-fir within the stand. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stands for recruitment of western larch. This will reduce fuels, provide safe ingress and egress adjacent to Highway 83, and enable the areas to obtain long-term fire resiliency. Ponderosa dominant trees found within the units will also be maintained to emphasize recruitment where it exists.
49	43	Existing Condition: Dense stands of Douglas-fir and western larch overstory with heavy lodgepole pine and Douglas-fir understory. Douglas-fir beetle is causing mortality throughout the stands in 10 inch plus Douglas-fir within the stand. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stands for recruitment of western larch. This will reduce fuels, provide safe ingress and egress adjacent to Highway 83, and enable the areas to obtain long-term fire resiliency. Ponderosa dominant trees found within the units will also be maintained to emphasize recruitment where it exists.

Unit(s)	Acres	Existing and Desired Condition
14	55	Existing Condition: Dense stands of Douglas-fir and western larch overstory with heavy lodgepole pine and Douglas-fir understory. Douglas-fir beetle is causing mortality throughout the stands in 10 inch plus Douglas-fir within the stand. Desired Condition: Emphasis of retention will focus on dominant and co-codominant western larch within the stands for recruitment of western larch. This will reduce fuels, provide safe ingress and egress adjacent to Highway 83, and enable the areas to obtain long-term fire resiliency. Ponderosa dominant trees found within the units will also be maintained to emphasize recruitment where it exists.

^ Changes to proposed openings occurred between the initial 60-day public review letter and the Regional Forester approval. Units 5 and 8 were removed as openings because proposed treatment changed from regeneration harvest to intermediate harvest within these units. Units 9, 11, 15, 19, 23, 24, 36, 41, and 75 were also removed as openings. These units were not large enough or adjacent to other regeneration treatments to meet 40 acres. The total 40-acre opening acreage changed from 896 acres to currently selected 495 acres.

Table B-3. Summary of New Road Construction

Road #	Miles*	Type
P1	0.3	Permanent
P10	0.1	Permanent
P11	0.4	Permanent
P12	0.4	Permanent
P15	0.4	Permanent/Storage
P16	0.1	Permanent
P17	0.2	Permanent
P18	0.6	Permanent
P19	0.3	Permanent
P23	0.3	Permanent
P25	0.3	Permanent
P29	0.3	Permanent
P35	0.3	Permanent
P37	0.3	Permanent
P39	0.3	Permanent
P44	0.2	Permanent
P46	0.4	Permanent
P47	0.5	Permanent
P49	0.4	Permanent
P51	0.3	Permanent
P57	0.3	Permanent
P58	0.1	Permanent
P60	0.3	Permanent
P61	0.8	Permanent
P63	0.1	Permanent
P65	1.1	Permanent
P69	1.0	Permanent
P7	0.2	Permanent
P71	0.4	Permanent
P73	0.3	Permanent
P9	0.1	Permanent
36112	0.5	Permanent - on Previously Decommissioned Prism/Storage
36113	1.7	Permanent - on Previously Decommissioned Prism/storage
36113-A	0.3	Permanent - on Previously Decommissioned Prism/Storage
20619	0.1	Temporary followed by Decommission
56228-E	0.3	Temporary followed by Decommission
PT1	0.1	Temporary followed by Decommission
PT11	0.2	Temporary followed by Decommission
PT13	0.1	Temporary followed by Decommission

Road #	Miles*	Type
PT15	0.1	Temporary followed by Decommission
PT17	0.3	Temporary followed by Decommission
PT19	0.3	Temporary followed by Decommission
PT21	0.2	Temporary followed by Decommission
PT23	0.3	Temporary followed by Decommission
PT25	0.1	Temporary followed by Decommission
PT27	0.1	Temporary followed by Decommission
PT27	0.1	Temporary followed by Decommission
PT29	0.2	Temporary followed by Decommission
PT3	0.4	Temporary followed by Decommission
PT31	0.2	Temporary followed by Decommission
PT35	0.1	Temporary followed by Decommission
PT37	0.6	Temporary followed by Decommission
PT39	0.0	Temporary followed by Decommission
PT4	0.3	Temporary followed by Decommission
PT41	0.2	Temporary followed by Decommission
PT5	0.2	Temporary followed by Decommission
PT6	0.3	Temporary followed by Decommission
PT7	0.2	Temporary followed by Decommission
PT9	0.1	Temporary followed by Decommission

*Rounding may cause slight differences between table sums and final selected action whole miles.

Table B-4. Summary of Road Management Updates (These roads will be closed to public motorized use year long. Approximately 20 miles of these roads will be placed in storage and available for future administrative use.)

Road #	System	Miles*	Treatment
4363	National Forest System Road - Store	0.3	Storage
17492	National Forest System Road - Store	0.9	Storage
17525	National Forest System Road - Store	2.3	Storage
16886-A	UND - UNDETERMINED	0.1	Add to National Forest System
17475-A	UND - UNDETERMINED	0.0	Add to National Forest System
17475-B	UND - UNDETERMINED	0.1	Add to National Forest System
17475-C	UND - UNDETERMINED	0.1	Add to National Forest System
17497-A	UND - UNDETERMINED	0.4	Add to National Forest System
17497-B	UND - UNDETERMINED	0.2	Add to National Forest System
17598	TMP - TEMPORARY	0.4	Add to National Forest System
17679	UND - UNDETERMINED	0.6	Add to National Forest System
17690	UND - UNDETERMINED	0.2	Add to National Forest System
20603	TMP - TEMPORARY	0.6	Add to National Forest System
20631	TMP - TEMPORARY	0.4	Add to National Forest System
36003-A	UND - UNDETERMINED	0.1	Add to National Forest System
36003-B	UND - UNDETERMINED	0.5	Add to National Forest System
36003-C	UND - UNDETERMINED	0.1	Add to National Forest System
36003-D	UND - UNDETERMINED	0.3	Add to National Forest System
36081	UND - UNDETERMINED	0.4	Add to National Forest System
36083	UND - UNDETERMINED	0.3	Add to National Forest System
36148	UND - UNDETERMINED	0.3	Add to National Forest System
36148-A	UND - UNDETERMINED	0.3	Add to National Forest System
36151	UND - UNDETERMINED	1.4	Add to National Forest System
36151-A	UND - UNDETERMINED	0.4	Add to National Forest System
36151-B	UND - UNDETERMINED	0.3	Add to National Forest System
36156	UND - UNDETERMINED	0.6	Add to National Forest System
36209	UND - UNDETERMINED	0.4	Add to National Forest System
36236	UND - UNDETERMINED	0.7	Add to National Forest System
36236-C	UND - UNDETERMINED	0.2	Add to National Forest System
36236-E	UND - UNDETERMINED	0.4	Add to National Forest System
36237	UND - UNDETERMINED	0.3	Add to National Forest System
36248	UND - UNDETERMINED	1.9	Add to National Forest System
36251	UND - UNDETERMINED	0.2	Add to National Forest System
36291	UND - UNDETERMINED	0.2	Add to National Forest System
36306	UND - UNDETERMINED	0.8	Add to National Forest System
36307	UND - UNDETERMINED	0.9	Add to National Forest System
36307-B	UND - UNDETERMINED	0.3	Add to National Forest System
36308	UND - UNDETERMINED	0.5	Add to National Forest System

Road #	System	Miles*	Treatment
36311	UND - UNDETERMINED	0.4	Add to National Forest System
36311	UND - UNDETERMINED	0.1	Add to National Forest System
36311A	UND - UNDETERMINED	0.3	Add to National Forest System
36311-A	UND - UNDETERMINED	0.6	Add to National Forest System
36311-B	UND - UNDETERMINED	0.3	Add to National Forest System
36312	UND - UNDETERMINED	0.2	Add to National Forest System
36315	UND - UNDETERMINED	0.2	Add to National Forest System
36315-C	UND - UNDETERMINED	0.2	Add to National Forest System
36316	UND - UNDETERMINED	0.5	Add to National Forest System
36316-A	UND - UNDETERMINED	0.4	Add to National Forest System
36318	UND - UNDETERMINED	0.2	Add to National Forest System
36318-B	UND - UNDETERMINED	0.1	Add to National Forest System
36318-C	UND - UNDETERMINED	0.1	Add to National Forest System
36325	UND - UNDETERMINED	0.7	Add to National Forest System
36332	UND - UNDETERMINED	0.6	Add to National Forest System
36332	UND - UNDETERMINED	0.4	Add to National Forest System
36332-E	UND - UNDETERMINED	0.2	Add to National Forest System
36333-A	UND - UNDETERMINED	0.5	Add to National Forest System
36335	UND - UNDETERMINED	0.2	Add to National Forest System
36337	UND - UNDETERMINED	0.4	Add to National Forest System
36340	UND - UNDETERMINED	0.8	Add to National Forest System
36347	UND - UNDETERMINED	0.8	Add to National Forest System
36347	UND - UNDETERMINED	0.1	Add to National Forest System
36347-A	UND - UNDETERMINED	0.3	Add to National Forest System
36348	UND - UNDETERMINED	0.7	Add to National Forest System
36348	UND - UNDETERMINED	0.5	Add to National Forest System
36350	UND - UNDETERMINED	0.6	Add to National Forest System
36351	UND - UNDETERMINED	0.1	Add to National Forest System
36375	UND - UNDETERMINED	0.2	Add to National Forest System
36375-B	UND - UNDETERMINED	0.1	Add to National Forest System
36377	UND - UNDETERMINED	0.4	Add to National Forest System
36377-A	UND - UNDETERMINED	0.7	Add to National Forest System
36378	UND - UNDETERMINED	0.1	Add to National Forest System
36378-A	UND - UNDETERMINED	0.9	Add to National Forest System
36378-B	UND - UNDETERMINED	0.4	Add to National Forest System
36378-D	UND - UNDETERMINED	0.4	Add to National Forest System
36378-D	UND - UNDETERMINED	0.1	Add to National Forest System
36393	UND - UNDETERMINED	1.1	Add to National Forest System
36393-A	UND - UNDETERMINED	0.8	Add to National Forest System
36393-D	UND - UNDETERMINED	0.4	Add to National Forest System

Road #	System	Miles*	Treatment
36393-I	UND - UNDETERMINED	0.4	Add to National Forest System
36393-M	UND - UNDETERMINED	0.3	Add to National Forest System
36402-D	UND - UNDETERMINED	0.1	Add to National Forest System
36449	UND - UNDETERMINED	0.2	Add to National Forest System
36517	UND - UNDETERMINED	0.3	Add to National Forest System
4360	UND - UNDETERMINED	0.3	Add to National Forest System
46012	UND - UNDETERMINED	2.4	Add to National Forest System
46012-A	UND - UNDETERMINED	0.6	Add to National Forest System
46012-A	UND - UNDETERMINED	0.2	Add to National Forest System
46012-H	UND - UNDETERMINED	0.1	Add to National Forest System
46013	UND - UNDETERMINED	0.7	Add to National Forest System
46015	UND - UNDETERMINED	0.6	Add to National Forest System
46018	UND - UNDETERMINED	0.8	Add to National Forest System
46018	UND - UNDETERMINED	0.2	Add to National Forest System
46019	UND - UNDETERMINED	0.7	Add to National Forest System
46019-B	UND - UNDETERMINED	0.5	Add to National Forest System
46020	UND - UNDETERMINED	1.3	Add to National Forest System
46023	UND - UNDETERMINED	0.3	Add to National Forest System
46023	UND - UNDETERMINED	1.5	Add to National Forest System
46023-A	UND - UNDETERMINED	0.3	Add to National Forest System
46027	UND - UNDETERMINED	0.2	Add to National Forest System
46027	UND - UNDETERMINED	0.2	Add to National Forest System
46027	UND - UNDETERMINED	0.2	Add to National Forest System
46027	UND - UNDETERMINED	0.3	Add to National Forest System
46027-A	UND - UNDETERMINED	0.2	Add to National Forest System
46027-I	UND - UNDETERMINED	0.1	Add to National Forest System
46027-I	UND - UNDETERMINED	0.2	Add to National Forest System
46028	UND - UNDETERMINED	0.6	Add to National Forest System
46032	UND - UNDETERMINED	0.9	Add to National Forest System
46032-A	UND - UNDETERMINED	0.4	Add to National Forest System
46312	UND - UNDETERMINED	1.2	Add to National Forest System
46312-A	UND - UNDETERMINED	0.5	Add to National Forest System
46312-B	UND - UNDETERMINED	0.2	Add to National Forest System
46312-D	UND - UNDETERMINED	0.2	Add to National Forest System
56055	UND - UNDETERMINED	0.8	Add to National Forest System
56202	UND - UNDETERMINED	0.6	Add to National Forest System
56202-B	UND - UNDETERMINED	0.2	Add to National Forest System
56204	UND - UNDETERMINED	0.3	Add to National Forest System
56206	UND - UNDETERMINED	0.4	Add to National Forest System
56206	UND - UNDETERMINED	0.2	Add to National Forest System

Road #	System	Miles*	Treatment
56207-A	UND - UNDETERMINED	0.5	Add to National Forest System
56207-B	UND - UNDETERMINED	0.5	Add to National Forest System
56207-C	UND - UNDETERMINED	0.3	Add to National Forest System
56210	UND - UNDETERMINED	0.7	Add to National Forest System
56211	UND - UNDETERMINED	0.5	Add to National Forest System
56224	UND - UNDETERMINED	0.9	Add to National Forest System
56224-A	UND - UNDETERMINED	0.1	Add to National Forest System
56225-C	UND - UNDETERMINED	0.1	Add to National Forest System
56225-D	UND - UNDETERMINED	0.6	Add to National Forest System
56225-E	UND - UNDETERMINED	0.2	Add to National Forest System
56225-F	UND - UNDETERMINED	0.2	Add to National Forest System
56225-H	UND - UNDETERMINED	0.1	Add to National Forest System
56228	UND - UNDETERMINED	1.1	Add to National Forest System
56229	UND - UNDETERMINED	0.1	Add to National Forest System
56229-B	UND - UNDETERMINED	0.4	Add to National Forest System
56229-G	UND - UNDETERMINED	0.2	Add to National Forest System
56230	UND - UNDETERMINED	1.0	Add to National Forest System
56230-B	UND - UNDETERMINED	0.3	Add to National Forest System
56231	UND - UNDETERMINED	0.9	Add to National Forest System
56231-B	UND - UNDETERMINED	0.4	Add to National Forest System
56232	UND - UNDETERMINED	0.3	Add to National Forest System
56232-A	UND - UNDETERMINED	0.1	Add to National Forest System
56290	UND - UNDETERMINED	0.3	Add to National Forest System
56318	UND - UNDETERMINED	0.7	Add to National Forest System
56319	UND - UNDETERMINED	0.2	Add to National Forest System
56320	UND - UNDETERMINED	1.2	Add to National Forest System
56320	UND - UNDETERMINED	0.2	Add to National Forest System
56320	UND - UNDETERMINED	0.1	Add to National Forest System
56320-I	UND - UNDETERMINED	0.1	Add to National Forest System
56320-K	UND - UNDETERMINED	0.2	Add to National Forest System
56321	UND - UNDETERMINED	0.6	Add to National Forest System
56385	UND - UNDETERMINED	0.3	Add to National Forest System
56386	UND - UNDETERMINED	0.3	Add to National Forest System
J60318	UND - UNDETERMINED	0.4	Add to National Forest System
J60345	UND - UNDETERMINED	0.2	Add to National Forest System
J60345	UND - UNDETERMINED	0.2	Add to National Forest System
J60351	UND - UNDETERMINED	0.1	Add to National Forest System
J60351-A	UND - UNDETERMINED	0.2	Add to National Forest System
J60351-B	UND - UNDETERMINED	0.1	Add to National Forest System
J60353	UND - UNDETERMINED	0.2	Add to National Forest System

Road #	System	Miles*	Treatment
J60357-A	UND - UNDETERMINED	0.3	Add to National Forest System
J60428	UND - UNDETERMINED	0.3	Add to National Forest System
J60440-B	UND - UNDETERMINED	0.5	Add to National Forest System
J60444	UND - UNDETERMINED	0.8	Add to National Forest System
J60448	UND - UNDETERMINED	0.3	Add to National Forest System
J60449	UND - UNDETERMINED	0.1	Add to National Forest System
J60449	UND - UNDETERMINED	0.2	Add to National Forest System
J60449-A	UND - UNDETERMINED	0.1	Add to National Forest System
J60451	UND - UNDETERMINED	0.4	Add to National Forest System
J60453-A	UND - UNDETERMINED	0.8	Add to National Forest System
J60453-B	UND - UNDETERMINED	0.2	Add to National Forest System
J60453-D	UND - UNDETERMINED	0.6	Add to National Forest System
J60453-E	UND - UNDETERMINED	0.4	Add to National Forest System
J60453-F	UND - UNDETERMINED	0.2	Add to National Forest System
J60454-D	UND - UNDETERMINED	0.3	Add to National Forest System
J60455	UND - UNDETERMINED	0.2	Add to National Forest System
J60459-C	UND - UNDETERMINED	0.3	Add to National Forest System
J60460	UND - UNDETERMINED	0.7	Add to National Forest System
J60460	UND - UNDETERMINED	0.1	Add to National Forest System
J60461-N	UND - UNDETERMINED	0.6	Add to National Forest System
J60461-P	UND - UNDETERMINED	0.4	Add to National Forest System
J60461-S	UND - UNDETERMINED	0.4	Add to National Forest System
J60461-T	UND - UNDETERMINED	0.3	Add to National Forest System
J60478	UND - UNDETERMINED	0.6	Add to National Forest System
J60483	UND - UNDETERMINED	0.7	Add to National Forest System
J60484	UND - UNDETERMINED	0.2	Add to National Forest System
36183	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36183	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36199	UND - UNDETERMINED	0.8	Add to National Forest System - Store
36225	UND - UNDETERMINED	0.1	Add to National Forest System - Store
36309	UND - UNDETERMINED	0.3	Add to National Forest System - Store
36309-A	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36309-C	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36309-C	UND - UNDETERMINED	0.2	Add to National Forest System - Store
36319	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36320	UND - UNDETERMINED	0.3	Add to National Forest System - Store
36320	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36321	UND - UNDETERMINED	0.1	Add to National Forest System - Store
36332-A	UND - UNDETERMINED	0.5	Add to National Forest System - Store
36332-G	UND - UNDETERMINED	0.1	Add to National Forest System - Store

Road #	System	Miles*	Treatment
36333	UND - UNDETERMINED	0.8	Add to National Forest System - Store
36334	UND - UNDETERMINED	2.0	Add to National Forest System - Store
36334-K	UND - UNDETERMINED	0.1	Add to National Forest System - Store
36334-L	UND - UNDETERMINED	0.4	Add to National Forest System - Store
36334-P	UND - UNDETERMINED	0.2	Add to National Forest System - Store
36336	UND - UNDETERMINED	0.2	Add to National Forest System - Store
36400	UND - UNDETERMINED	0.0	Add to National Forest System - Store
36451	UND - UNDETERMINED	0.3	Add to National Forest System - Store
36466	UND - UNDETERMINED	0.5	Add to National Forest System - Store
46012	UND - UNDETERMINED	0.8	Add to National Forest System - Store
46012-J	UND - UNDETERMINED	0.2	Add to National Forest System - Store
46012-K	UND - UNDETERMINED	0.3	Add to National Forest System - Store
46012-O	UND - UNDETERMINED	0.3	Add to National Forest System - Store
46028	UND - UNDETERMINED	0.1	Add to National Forest System - Store
46028	UND - UNDETERMINED	1.8	Add to National Forest System - Store
46043	UND - UNDETERMINED	0.6	Add to National Forest System - Store
46046	UND - UNDETERMINED	1.1	Add to National Forest System - Store
46046-D	UND - UNDETERMINED	0.1	Add to National Forest System - Store
46046-G	UND - UNDETERMINED	0.6	Add to National Forest System - Store
46046-M	UND - UNDETERMINED	0.2	Add to National Forest System - Store
46046-P	UND - UNDETERMINED	0.3	Add to National Forest System - Store
56206-A	UND - UNDETERMINED	0.4	Add to National Forest System - Store
56207	UND - UNDETERMINED	1.1	Add to National Forest System - Store
56207-B	UND - UNDETERMINED	0.1	Add to National Forest System - Store
56208	UND - UNDETERMINED	0.3	Add to National Forest System - Store
56209	UND - UNDETERMINED	0.3	Add to National Forest System - Store
J60451-A	UND - UNDETERMINED	0.3	Add to National Forest System - Store
J60460-A	UND - UNDETERMINED	0.3	Add to National Forest System - Store
J60462	UND - UNDETERMINED	0.1	Add to National Forest System - Store
J60462-A	UND - UNDETERMINED	0.2	Add to National Forest System - Store
J60462-I	UND - UNDETERMINED	0.3	Add to National Forest System - Store
16323	NFSR - NATIONAL FOREST SYSTEM ROAD	0.2	Decommission Existing Road
16323	NFSR - NATIONAL FOREST SYSTEM ROAD	0.2	Decommission Existing Road
16323	NFSR - NATIONAL FOREST SYSTEM ROAD	0.1	Decommission Existing Road
17461	NFSR - NATIONAL FOREST SYSTEM ROAD	0.2	Decommission Existing Road
17496	NFSR - NATIONAL FOREST SYSTEM ROAD	0.2	Decommission Existing Road
17679	NFSR - NATIONAL FOREST SYSTEM ROAD	0.1	Decommission Existing Road
36077	NFSR - NATIONAL FOREST SYSTEM ROAD	0.1	Decommission Existing Road
4351	NFSR - NATIONAL FOREST SYSTEM ROAD	0.7	Decommission Existing Road
4358	NFSR - NATIONAL FOREST SYSTEM ROAD	0.5	Decommission Existing Road

Road #	System	Miles*	Treatment
4358	NFSR - NATIONAL FOREST SYSTEM ROAD	0.3	Decommission Existing Road
671	NFSR - NATIONAL FOREST SYSTEM ROAD	1.3	Decommission Existing Road
671	NFSR - NATIONAL FOREST SYSTEM ROAD	1.3	Decommission Existing Road
16886	UND - UNDETERMINED	0.1	Decommission Existing Road
17475-A	UND - UNDETERMINED	0.3	Decommission Existing Road
17475-A	UND - UNDETERMINED	0.3	Decommission Existing Road
17475-C	UND - UNDETERMINED	0.2	Decommission Existing Road
17497-C	UND - UNDETERMINED	0.1	Decommission Existing Road
20631	TMP - TEMPORARY	0.1	Decommission Existing Road
36003	UND - UNDETERMINED	0.2	Decommission Existing Road
36081	UND - UNDETERMINED	0.3	Decommission Existing Road
36084	UND - UNDETERMINED	0.2	Decommission Existing Road
36088	UND - UNDETERMINED	0.6	Decommission Existing Road
36090	UND - UNDETERMINED	0.3	Decommission Existing Road
36147	UND - UNDETERMINED	0.3	Decommission Existing Road
36149	UND - UNDETERMINED	0.1	Decommission Existing Road
36151-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36156-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36209	UND - UNDETERMINED	0.1	Decommission Existing Road
36209-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36235	UND - UNDETERMINED	1.2	Decommission Existing Road
36235-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36235-B	UND - UNDETERMINED	0.6	Decommission Existing Road
36236	UND - UNDETERMINED	0.2	Decommission Existing Road
36236-A	UND - UNDETERMINED	0.5	Decommission Existing Road
36236-B	UND - UNDETERMINED	0.5	Decommission Existing Road
36236-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36236-D	UND - UNDETERMINED	0.3	Decommission Existing Road
36236-F	UND - UNDETERMINED	0.1	Decommission Existing Road
36236-G	UND - UNDETERMINED	0.4	Decommission Existing Road
36238	UND - UNDETERMINED	0.6	Decommission Existing Road
36238-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36238-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36238-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36248-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36248-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36248-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36248-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36248-E	UND - UNDETERMINED	0.2	Decommission Existing Road
36291-A	UND - UNDETERMINED	0.3	Decommission Existing Road

Road #	System	Miles*	Treatment
36291-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36291-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36291-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36291-E	UND - UNDETERMINED	0.2	Decommission Existing Road
36292	UND - UNDETERMINED	0.1	Decommission Existing Road
36302	UND - UNDETERMINED	0.5	Decommission Existing Road
36302-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36302-C	UND - UNDETERMINED	0.3	Decommission Existing Road
36302-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36302-E	UND - UNDETERMINED	0.2	Decommission Existing Road
36302-F	UND - UNDETERMINED	0.3	Decommission Existing Road
36306-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36307-A	UND - UNDETERMINED	0.4	Decommission Existing Road
36308-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36309-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36309-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36310	UND - UNDETERMINED	0.2	Decommission Existing Road
36311	UND - UNDETERMINED	0.2	Decommission Existing Road
36311-C	UND - UNDETERMINED	0.3	Decommission Existing Road
36312	UND - UNDETERMINED	0.2	Decommission Existing Road
36312-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36315	UND - UNDETERMINED	0.2	Decommission Existing Road
36315-A	UND - UNDETERMINED	0.4	Decommission Existing Road
36315-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36316-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36316-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36316-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36316-E	UND - UNDETERMINED	0.1	Decommission Existing Road
36316-F	UND - UNDETERMINED	0.1	Decommission Existing Road
36317	UND - UNDETERMINED	0.9	Decommission Existing Road
36317-A	UND - UNDETERMINED	0.8	Decommission Existing Road
36317-B	UND - UNDETERMINED	0.5	Decommission Existing Road
36317-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36318	UND - UNDETERMINED	0.3	Decommission Existing Road
36318-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36318-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36318-D	UND - UNDETERMINED	0.2	Decommission Existing Road
36322	UND - UNDETERMINED	0.4	Decommission Existing Road
36323	UND - UNDETERMINED	0.7	Decommission Existing Road
36323-A	UND - UNDETERMINED	0.1	Decommission Existing Road

Road #	System	Miles*	Treatment
36323-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36324	UND - UNDETERMINED	0.6	Decommission Existing Road
36327-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36327-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36327-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36328	UND - UNDETERMINED	0.4	Decommission Existing Road
36329	UND - UNDETERMINED	0.5	Decommission Existing Road
36329-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36329-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36331	UND - UNDETERMINED	0.8	Decommission Existing Road
36332-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36332-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36332-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36332-D	UND - UNDETERMINED	0.2	Decommission Existing Road
36332-F	UND - UNDETERMINED	0.1	Decommission Existing Road
36332-H	UND - UNDETERMINED	0.5	Decommission Existing Road
36332-I	UND - UNDETERMINED	0.1	Decommission Existing Road
36332-J	UND - UNDETERMINED	0.2	Decommission Existing Road
36333-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36333-C	UND - UNDETERMINED	0.4	Decommission Existing Road
36333-D	UND - UNDETERMINED	0.5	Decommission Existing Road
36333-E	UND - UNDETERMINED	0.2	Decommission Existing Road
36333-F	UND - UNDETERMINED	0.3	Decommission Existing Road
36333-G	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-A	UND - UNDETERMINED	0.0	Decommission Existing Road
36334-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36334-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-E	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-F	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-G	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-H	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-I	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-J	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-K	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-M	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-N	UND - UNDETERMINED	0.3	Decommission Existing Road
36334-O	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-Q	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-R	UND - UNDETERMINED	0.2	Decommission Existing Road

Road #	System	Miles*	Treatment
36334-S	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-T	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-U	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-V	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-W	UND - UNDETERMINED	0.6	Decommission Existing Road
36334-X	UND - UNDETERMINED	0.2	Decommission Existing Road
36334-Y	UND - UNDETERMINED	0.1	Decommission Existing Road
36334-Z	UND - UNDETERMINED	0.0	Decommission Existing Road
36335-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36336-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36338	UND - UNDETERMINED	0.4	Decommission Existing Road
36338-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36339	UND - UNDETERMINED	0.4	Decommission Existing Road
36339-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36340	UND - UNDETERMINED	0.3	Decommission Existing Road
36340-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36340-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36340-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36344	UND - UNDETERMINED	0.4	Decommission Existing Road
36344-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36344-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36347-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36347-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36347-D	UND - UNDETERMINED	0.3	Decommission Existing Road
36347-E	UND - UNDETERMINED	0.1	Decommission Existing Road
36348-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36348-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36348-C	UND - UNDETERMINED	0.3	Decommission Existing Road
36348-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36348-D	UND - UNDETERMINED	0.3	Decommission Existing Road
36348-D	UND - UNDETERMINED	0.0	Decommission Existing Road
36348-E	UND - UNDETERMINED	0.1	Decommission Existing Road
36348-F	UND - UNDETERMINED	0.1	Decommission Existing Road
36348-F	UND - UNDETERMINED	0.2	Decommission Existing Road
36348-G	UND - UNDETERMINED	0.2	Decommission Existing Road
36350-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36350-B	UND - UNDETERMINED	0.5	Decommission Existing Road
36350-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36350-D	UND - UNDETERMINED	0.1	Decommission Existing Road
36357	UND - UNDETERMINED	0.5	Decommission Existing Road

Road #	System	Miles*	Treatment
36357-A	UND - UNDETERMINED	0.7	Decommission Existing Road
36357-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36359	UND - UNDETERMINED	0.5	Decommission Existing Road
36359	UND - UNDETERMINED	0.4	Decommission Existing Road
36359-A	UND - UNDETERMINED	0.4	Decommission Existing Road
36359-A	UND - UNDETERMINED	0.0	Decommission Existing Road
36359-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36359-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36359-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36375	UND - UNDETERMINED	0.4	Decommission Existing Road
36375-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36377	UND - UNDETERMINED	0.4	Decommission Existing Road
36377-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36377-C	UND - UNDETERMINED	0.1	Decommission Existing Road
36377-D	UND - UNDETERMINED	0.0	Decommission Existing Road
36378	UND - UNDETERMINED	0.1	Decommission Existing Road
36378-B	UND - UNDETERMINED	0.1	Decommission Existing Road
36378-C	UND - UNDETERMINED	0.3	Decommission Existing Road
36378-E	UND - UNDETERMINED	0.1	Decommission Existing Road
36378-F	UND - UNDETERMINED	0.1	Decommission Existing Road
36378-G	UND - UNDETERMINED	0.2	Decommission Existing Road
36393-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36393-C	UND - UNDETERMINED	1.0	Decommission Existing Road
36393-E	UND - UNDETERMINED	0.2	Decommission Existing Road
36393-F	UND - UNDETERMINED	0.2	Decommission Existing Road
36393-G	UND - UNDETERMINED	0.0	Decommission Existing Road
36393-H	UND - UNDETERMINED	0.1	Decommission Existing Road
36393-J	UND - UNDETERMINED	0.2	Decommission Existing Road
36393-K	UND - UNDETERMINED	0.1	Decommission Existing Road
36393-L	UND - UNDETERMINED	0.0	Decommission Existing Road
36400	UND - UNDETERMINED	1.5	Decommission Existing Road
36402	UND - UNDETERMINED	0.5	Decommission Existing Road
36402-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36402-B	UND - UNDETERMINED	0.3	Decommission Existing Road
36402-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36416	NOT - NOT NEEDED	0.2	Decommission Existing Road
36440	UND - UNDETERMINED	0.7	Decommission Existing Road
36441	UND - UNDETERMINED	0.6	Decommission Existing Road
36441-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36466	UND - UNDETERMINED	0.2	Decommission Existing Road

Road #	System	Miles*	Treatment
36466	UND - UNDETERMINED	0.5	Decommission Existing Road
36493-A	UND - UNDETERMINED	0.2	Decommission Existing Road
36493-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36494-A	UND - UNDETERMINED	0.3	Decommission Existing Road
36494-B	UND - UNDETERMINED	0.2	Decommission Existing Road
36494-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36517	UND - UNDETERMINED	0.2	Decommission Existing Road
36517-A	UND - UNDETERMINED	0.1	Decommission Existing Road
36517-B	UND - UNDETERMINED	0.4	Decommission Existing Road
36517-C	UND - UNDETERMINED	0.2	Decommission Existing Road
36518	UND - UNDETERMINED	0.1	Decommission Existing Road
46012	UND - UNDETERMINED	0.3	Decommission Existing Road
46012-B	UND - UNDETERMINED	0.3	Decommission Existing Road
46012-C	UND - UNDETERMINED	0.2	Decommission Existing Road
46012-D	UND - UNDETERMINED	0.3	Decommission Existing Road
46012-E	UND - UNDETERMINED	0.1	Decommission Existing Road
46012-F	UND - UNDETERMINED	0.3	Decommission Existing Road
46012-G	UND - UNDETERMINED	0.2	Decommission Existing Road
46012-I	UND - UNDETERMINED	0.5	Decommission Existing Road
46012-L	UND - UNDETERMINED	0.1	Decommission Existing Road
46012-M	UND - UNDETERMINED	0.2	Decommission Existing Road
46012-N	UND - UNDETERMINED	0.2	Decommission Existing Road
46012-P	UND - UNDETERMINED	0.2	Decommission Existing Road
46012-Q	UND - UNDETERMINED	0.2	Decommission Existing Road
46014	UND - UNDETERMINED	0.5	Decommission Existing Road
46014-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46014-B	UND - UNDETERMINED	0.1	Decommission Existing Road
46016	UND - UNDETERMINED	0.2	Decommission Existing Road
46017	UND - UNDETERMINED	1.0	Decommission Existing Road
46017-A	UND - UNDETERMINED	0.3	Decommission Existing Road
46018	UND - UNDETERMINED	0.3	Decommission Existing Road
46018-A	UND - UNDETERMINED	0.2	Decommission Existing Road
46018-B	UND - UNDETERMINED	0.1	Decommission Existing Road
46018-C	UND - UNDETERMINED	0.3	Decommission Existing Road
46018-D	UND - UNDETERMINED	0.2	Decommission Existing Road
46019-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46019-B	UND - UNDETERMINED	0.2	Decommission Existing Road
46019-C	UND - UNDETERMINED	0.6	Decommission Existing Road
46019-D	UND - UNDETERMINED	0.4	Decommission Existing Road
46019-E	UND - UNDETERMINED	0.1	Decommission Existing Road

Road #	System	Miles*	Treatment
46019-F	UND - UNDETERMINED	0.4	Decommission Existing Road
46019-G	UND - UNDETERMINED	0.4	Decommission Existing Road
46019-H	UND - UNDETERMINED	0.3	Decommission Existing Road
46019-I	UND - UNDETERMINED	0.1	Decommission Existing Road
46019-J	UND - UNDETERMINED	0.1	Decommission Existing Road
46020-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46022	UND - UNDETERMINED	0.4	Decommission Existing Road
46023	UND - UNDETERMINED	0.1	Decommission Existing Road
46025	UND - UNDETERMINED	1.0	Decommission Existing Road
46026	UND - UNDETERMINED	0.1	Decommission Existing Road
46027-B	UND - UNDETERMINED	0.4	Decommission Existing Road
46027-C	UND - UNDETERMINED	0.3	Decommission Existing Road
46027-D	UND - UNDETERMINED	0.3	Decommission Existing Road
46027-E	UND - UNDETERMINED	0.3	Decommission Existing Road
46027-F	UND - UNDETERMINED	0.2	Decommission Existing Road
46027-G	UND - UNDETERMINED	0.1	Decommission Existing Road
46027-H	UND - UNDETERMINED	0.1	Decommission Existing Road
46027-I	UND - UNDETERMINED	0.1	Decommission Existing Road
46029	UND - UNDETERMINED	0.6	Decommission Existing Road
46031	UND - UNDETERMINED	0.8	Decommission Existing Road
46032-B	UND - UNDETERMINED	0.4	Decommission Existing Road
46032-C	UND - UNDETERMINED	0.2	Decommission Existing Road
46032-D	UND - UNDETERMINED	0.2	Decommission Existing Road
46043	UND - UNDETERMINED	0.2	Decommission Existing Road
46043	UND - UNDETERMINED	0.3	Decommission Existing Road
46043	UND - UNDETERMINED	0.0	Decommission Existing Road
46043-A	UND - UNDETERMINED	0.3	Decommission Existing Road
46043-B	UND - UNDETERMINED	0.2	Decommission Existing Road
46043-C	UND - UNDETERMINED	0.4	Decommission Existing Road
46043-D	UND - UNDETERMINED	0.6	Decommission Existing Road
46043-E	UND - UNDETERMINED	0.2	Decommission Existing Road
46043-F	UND - UNDETERMINED	0.2	Decommission Existing Road
46043-G	UND - UNDETERMINED	0.1	Decommission Existing Road
46044	UND - UNDETERMINED	0.7	Decommission Existing Road
46044-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46046	UND - UNDETERMINED	0.2	Decommission Existing Road
46046	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-A	UND - UNDETERMINED	0.7	Decommission Existing Road
46046-B	UND - UNDETERMINED	0.4	Decommission Existing Road
46046-C	UND - UNDETERMINED	0.3	Decommission Existing Road

Road #	System	Miles*	Treatment
46046-D	UND - UNDETERMINED	0.0	Decommission Existing Road
46046-E	UND - UNDETERMINED	0.2	Decommission Existing Road
46046-F	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-H	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-I	UND - UNDETERMINED	0.3	Decommission Existing Road
46046-J	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-K	UND - UNDETERMINED	0.5	Decommission Existing Road
46046-L	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-M	UND - UNDETERMINED	0.1	Decommission Existing Road
46046-N	UND - UNDETERMINED	0.4	Decommission Existing Road
46046-O	UND - UNDETERMINED	0.3	Decommission Existing Road
46046-Q	UND - UNDETERMINED	0.3	Decommission Existing Road
46046-R	UND - UNDETERMINED	0.2	Decommission Existing Road
46046-S	UND - UNDETERMINED	0.1	Decommission Existing Road
46056	UND - UNDETERMINED	0.8	Decommission Existing Road
46056-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46056-B	UND - UNDETERMINED	0.6	Decommission Existing Road
46056-C	UND - UNDETERMINED	0.1	Decommission Existing Road
46056-D	UND - UNDETERMINED	0.1	Decommission Existing Road
46056-E	UND - UNDETERMINED	0.3	Decommission Existing Road
46056-F	UND - UNDETERMINED	0.1	Decommission Existing Road
46312-A	UND - UNDETERMINED	0.2	Decommission Existing Road
46312-C	UND - UNDETERMINED	0.1	Decommission Existing Road
46312-D	UND - UNDETERMINED	0.1	Decommission Existing Road
46312-E	UND - UNDETERMINED	0.1	Decommission Existing Road
46312-F	UND - UNDETERMINED	0.2	Decommission Existing Road
46312-G	UND - UNDETERMINED	0.1	Decommission Existing Road
46743	UND - UNDETERMINED	0.1	Decommission Existing Road
46768	UND - UNDETERMINED	0.3	Decommission Existing Road
46789	UND - UNDETERMINED	0.5	Decommission Existing Road
46831	UND - UNDETERMINED	0.4	Decommission Existing Road
46835	UND - UNDETERMINED	0.1	Decommission Existing Road
46835	UND - UNDETERMINED	0.1	Decommission Existing Road
46838	UND - UNDETERMINED	0.3	Decommission Existing Road
46838-A	UND - UNDETERMINED	0.1	Decommission Existing Road
46839	UND - UNDETERMINED	0.6	Decommission Existing Road
56201	UND - UNDETERMINED	0.4	Decommission Existing Road
56201-A	UND - UNDETERMINED	0.1	Decommission Existing Road
56204	UND - UNDETERMINED	0.1	Decommission Existing Road
56206-B	UND - UNDETERMINED	0.1	Decommission Existing Road

Road #	System	Miles*	Treatment
56207	UND - UNDETERMINED	0.6	Decommission Existing Road
56207-B	UND - UNDETERMINED	0.2	Decommission Existing Road
56207-D	UND - UNDETERMINED	0.2	Decommission Existing Road
56207-E	UND - UNDETERMINED	0.9	Decommission Existing Road
56208	UND - UNDETERMINED	0.1	Decommission Existing Road
56210-A	UND - UNDETERMINED	0.1	Decommission Existing Road
56210-B	UND - UNDETERMINED	0.1	Decommission Existing Road
56211-A	UND - UNDETERMINED	0.5	Decommission Existing Road
56225	UND - UNDETERMINED	0.5	Decommission Existing Road
56225-A	UND - UNDETERMINED	0.2	Decommission Existing Road
56225-B	UND - UNDETERMINED	0.2	Decommission Existing Road
56225-C	UND - UNDETERMINED	0.3	Decommission Existing Road
56225-F	UND - UNDETERMINED	0.1	Decommission Existing Road
56225-G	UND - UNDETERMINED	0.4	Decommission Existing Road
56225-I	UND - UNDETERMINED	0.1	Decommission Existing Road
56225-J	UND - UNDETERMINED	0.1	Decommission Existing Road
56225-K	UND - UNDETERMINED	0.7	Decommission Existing Road
56225-L	UND - UNDETERMINED	0.3	Decommission Existing Road
56225-M	UND - UNDETERMINED	0.2	Decommission Existing Road
56228-A	UND - UNDETERMINED	0.3	Decommission Existing Road
56228-B	UND - UNDETERMINED	0.2	Decommission Existing Road
56228-C	UND - UNDETERMINED	0.1	Decommission Existing Road
56228-D	UND - UNDETERMINED	0.3	Decommission Existing Road
56228-F	UND - UNDETERMINED	0.2	Decommission Existing Road
56228-G	UND - UNDETERMINED	0.0	Decommission Existing Road
56229	UND - UNDETERMINED	0.8	Decommission Existing Road
56229-A	UND - UNDETERMINED	0.2	Decommission Existing Road
56229-B	UND - UNDETERMINED	0.5	Decommission Existing Road
56229-C	UND - UNDETERMINED	0.5	Decommission Existing Road
56229-D	UND - UNDETERMINED	0.2	Decommission Existing Road
56229-E	UND - UNDETERMINED	0.2	Decommission Existing Road
56229-F	UND - UNDETERMINED	0.0	Decommission Existing Road
56229-H	UND - UNDETERMINED	0.1	Decommission Existing Road
56230-A	UND - UNDETERMINED	0.3	Decommission Existing Road
56230-C	UND - UNDETERMINED	0.2	Decommission Existing Road
56231-A	UND - UNDETERMINED	0.1	Decommission Existing Road
56231-C	UND - UNDETERMINED	0.2	Decommission Existing Road
56317	UND - UNDETERMINED	0.2	Decommission Existing Road
56318-A	UND - UNDETERMINED	0.3	Decommission Existing Road
56318-B	UND - UNDETERMINED	0.1	Decommission Existing Road

Road #	System	Miles*	Treatment
56318-C	UND - UNDETERMINED	0.4	Decommission Existing Road
56318-D	UND - UNDETERMINED	0.4	Decommission Existing Road
56319	UND - UNDETERMINED	0.0	Decommission Existing Road
56319-A	UND - UNDETERMINED	0.0	Decommission Existing Road
56320	UND - UNDETERMINED	0.1	Decommission Existing Road
56320	UND - UNDETERMINED	1.8	Decommission Existing Road
56320	UND - UNDETERMINED	0.3	Decommission Existing Road
56320	UND - UNDETERMINED	0.1	Decommission Existing Road
56320	UND - UNDETERMINED	0.4	Decommission Existing Road
56320-A	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-B	UND - UNDETERMINED	0.1	Decommission Existing Road
56320-C	UND - UNDETERMINED	0.3	Decommission Existing Road
56320-D	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-E	UND - UNDETERMINED	0.5	Decommission Existing Road
56320-F	UND - UNDETERMINED	0.5	Decommission Existing Road
56320-G	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-H	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-I	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-J	UND - UNDETERMINED	0.1	Decommission Existing Road
56320-L	UND - UNDETERMINED	0.2	Decommission Existing Road
56320-M	UND - UNDETERMINED	0.1	Decommission Existing Road
56320-N	UND - UNDETERMINED	0.1	Decommission Existing Road
56320-O	UND - UNDETERMINED	0.1	Decommission Existing Road
56321	UND - UNDETERMINED	0.2	Decommission Existing Road
56331	UND - UNDETERMINED	0.0	Decommission Existing Road
56331	UND - UNDETERMINED	0.3	Decommission Existing Road
56331-A	UND - UNDETERMINED	0.5	Decommission Existing Road
56336	UND - UNDETERMINED	0.3	Decommission Existing Road
56373	UND - UNDETERMINED	0.1	Decommission Existing Road
56374	UND - UNDETERMINED	0.4	Decommission Existing Road
56375	UND - UNDETERMINED	0.1	Decommission Existing Road
56376	UND - UNDETERMINED	0.6	Decommission Existing Road
56376-A	UND - UNDETERMINED	0.2	Decommission Existing Road
56376-B	UND - UNDETERMINED	0.9	Decommission Existing Road
56377	UND - UNDETERMINED	0.3	Decommission Existing Road
56377-A	UND - UNDETERMINED	0.1	Decommission Existing Road
56377-B	UND - UNDETERMINED	0.1	Decommission Existing Road
56377-C	UND - UNDETERMINED	0.1	Decommission Existing Road
56385	UND - UNDETERMINED	0.2	Decommission Existing Road
56385-A	UND - UNDETERMINED	0.1	Decommission Existing Road

Road #	System	Miles*	Treatment
56385-B	UND - UNDETERMINED	0.1	Decommission Existing Road
56385-C	UND - UNDETERMINED	0.1	Decommission Existing Road
56385-D	UND - UNDETERMINED	0.1	Decommission Existing Road
J60339	UND - UNDETERMINED	0.2	Decommission Existing Road
J60340	UND - UNDETERMINED	0.1	Decommission Existing Road
J60341	UND - UNDETERMINED	0.4	Decommission Existing Road
J60341-A	UND - UNDETERMINED	0.2	Decommission Existing Road
J60342	UND - UNDETERMINED	0.2	Decommission Existing Road
J60342-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60344	UND - UNDETERMINED	0.8	Decommission Existing Road
J60345	UND - UNDETERMINED	0.2	Decommission Existing Road
J60345-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60346	UND - UNDETERMINED	0.2	Decommission Existing Road
J60347	UND - UNDETERMINED	0.2	Decommission Existing Road
J60347-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60348	UND - UNDETERMINED	0.2	Decommission Existing Road
J60348-A	UND - UNDETERMINED	0.2	Decommission Existing Road
J60348-B	UND - UNDETERMINED	0.1	Decommission Existing Road
J60351	UND - UNDETERMINED	0.2	Decommission Existing Road
J60351-C	UND - UNDETERMINED	0.1	Decommission Existing Road
J60352	UND - UNDETERMINED	0.4	Decommission Existing Road
J60352-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60354	UND - UNDETERMINED	0.6	Decommission Existing Road
J60354-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60355	UND - UNDETERMINED	0.5	Decommission Existing Road
J60356	UND - UNDETERMINED	0.3	Decommission Existing Road
J60357	UND - UNDETERMINED	0.8	Decommission Existing Road
J60440	UND - UNDETERMINED	0.7	Decommission Existing Road
J60440-A	UND - UNDETERMINED	0.2	Decommission Existing Road
J60440-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60440-C	UND - UNDETERMINED	0.2	Decommission Existing Road
J60440-D	UND - UNDETERMINED	0.5	Decommission Existing Road
J60440-E	UND - UNDETERMINED	0.2	Decommission Existing Road
J60440-F	UND - UNDETERMINED	0.2	Decommission Existing Road
J60440-G	UND - UNDETERMINED	0.1	Decommission Existing Road
J60440-H	UND - UNDETERMINED	0.3	Decommission Existing Road
J60440-I	UND - UNDETERMINED	0.1	Decommission Existing Road
J60440-J	UND - UNDETERMINED	0.1	Decommission Existing Road
J60441	UND - UNDETERMINED	0.2	Decommission Existing Road
J60442	UND - UNDETERMINED	0.4	Decommission Existing Road

Road #	System	Miles*	Treatment
J60442-A	UND - UNDETERMINED	0.3	Decommission Existing Road
J60442-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60442-C	UND - UNDETERMINED	0.1	Decommission Existing Road
J60443	UND - UNDETERMINED	0.2	Decommission Existing Road
J60444-A	UND - UNDETERMINED	0.8	Decommission Existing Road
J60444-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60444-C	UND - UNDETERMINED	0.7	Decommission Existing Road
J60444-D	UND - UNDETERMINED	0.3	Decommission Existing Road
J60444-E	UND - UNDETERMINED	0.2	Decommission Existing Road
J60444-F	UND - UNDETERMINED	0.1	Decommission Existing Road
J60445	UND - UNDETERMINED	0.2	Decommission Existing Road
J60445-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60445-B	UND - UNDETERMINED	0.3	Decommission Existing Road
J60445-C	UND - UNDETERMINED	0.1	Decommission Existing Road
J60445-D	UND - UNDETERMINED	0.2	Decommission Existing Road
J60445-E	UND - UNDETERMINED	0.2	Decommission Existing Road
J60445-F	UND - UNDETERMINED	0.2	Decommission Existing Road
J60447	UND - UNDETERMINED	0.4	Decommission Existing Road
J60448-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60448-B	UND - UNDETERMINED	0.6	Decommission Existing Road
J60448-C	UND - UNDETERMINED	0.6	Decommission Existing Road
J60448-D	UND - UNDETERMINED	0.1	Decommission Existing Road
J60448-E	UND - UNDETERMINED	0.5	Decommission Existing Road
J60448-F	UND - UNDETERMINED	0.2	Decommission Existing Road
J60448-G	UND - UNDETERMINED	0.1	Decommission Existing Road
J60448-H	UND - UNDETERMINED	0.2	Decommission Existing Road
J60448-I	UND - UNDETERMINED	0.3	Decommission Existing Road
J60449	UND - UNDETERMINED	0.2	Decommission Existing Road
J60449-B	UND - UNDETERMINED	0.1	Decommission Existing Road
J60450	UND - UNDETERMINED	0.3	Decommission Existing Road
J60450-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60451	UND - UNDETERMINED	0.4	Decommission Existing Road
J60452	UND - UNDETERMINED	1.0	Decommission Existing Road
J60452-A	UND - UNDETERMINED	0.7	Decommission Existing Road
J60452-B	UND - UNDETERMINED	1.1	Decommission Existing Road
J60452-C	UND - UNDETERMINED	0.3	Decommission Existing Road
J60452-D	UND - UNDETERMINED	1.0	Decommission Existing Road
J60452-E	UND - UNDETERMINED	0.6	Decommission Existing Road
J60452-F	UND - UNDETERMINED	0.1	Decommission Existing Road
J60452-G	UND - UNDETERMINED	0.2	Decommission Existing Road

Road #	System	Miles*	Treatment
J60452-H	UND - UNDETERMINED	0.1	Decommission Existing Road
J60453	UND - UNDETERMINED	0.4	Decommission Existing Road
J60453-A	UND - UNDETERMINED	0.3	Decommission Existing Road
J60453-C	UND - UNDETERMINED	0.6	Decommission Existing Road
J60454	UND - UNDETERMINED	0.6	Decommission Existing Road
J60454-A	UND - UNDETERMINED	0.3	Decommission Existing Road
J60454-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60454-C	UND - UNDETERMINED	0.5	Decommission Existing Road
J60454-E	UND - UNDETERMINED	0.2	Decommission Existing Road
J60454-F	UND - UNDETERMINED	0.3	Decommission Existing Road
J60454-G	UND - UNDETERMINED	0.4	Decommission Existing Road
J60454-H	UND - UNDETERMINED	0.1	Decommission Existing Road
J60455	UND - UNDETERMINED	0.2	Decommission Existing Road
J60455	UND - UNDETERMINED	0.1	Decommission Existing Road
J60457	UND - UNDETERMINED	0.4	Decommission Existing Road
J60459	UND - UNDETERMINED	0.5	Decommission Existing Road
J60459-A	UND - UNDETERMINED	0.2	Decommission Existing Road
J60459-B	UND - UNDETERMINED	0.9	Decommission Existing Road
J60460	UND - UNDETERMINED	0.2	Decommission Existing Road
J60460	UND - UNDETERMINED	0.1	Decommission Existing Road
J60460-B	UND - UNDETERMINED	0.2	Decommission Existing Road
J60460-C	UND - UNDETERMINED	0.3	Decommission Existing Road
J60460-D	UND - UNDETERMINED	0.3	Decommission Existing Road
J60460-E	UND - UNDETERMINED	0.1	Decommission Existing Road
J60461	UND - UNDETERMINED	0.7	Decommission Existing Road
J60461-A	UND - UNDETERMINED	0.3	Decommission Existing Road
J60461-B	UND - UNDETERMINED	0.6	Decommission Existing Road
J60461-C	UND - UNDETERMINED	0.4	Decommission Existing Road
J60461-D	UND - UNDETERMINED	0.3	Decommission Existing Road
J60461-E	UND - UNDETERMINED	0.4	Decommission Existing Road
J60461-F	UND - UNDETERMINED	0.3	Decommission Existing Road
J60461-G	UND - UNDETERMINED	0.4	Decommission Existing Road
J60461-H	UND - UNDETERMINED	0.2	Decommission Existing Road
J60461-I	UND - UNDETERMINED	0.6	Decommission Existing Road
J60461-J	UND - UNDETERMINED	0.3	Decommission Existing Road
J60461-K	UND - UNDETERMINED	0.6	Decommission Existing Road
J60461-L	UND - UNDETERMINED	1.0	Decommission Existing Road
J60461-M	UND - UNDETERMINED	0.1	Decommission Existing Road
J60461-O	UND - UNDETERMINED	0.6	Decommission Existing Road
J60461-Q	UND - UNDETERMINED	0.9	Decommission Existing Road

Road #	System	Miles*	Treatment
J60461-R	UND - UNDETERMINED	0.1	Decommission Existing Road
J60462	UND - UNDETERMINED	0.4	Decommission Existing Road
J60462-B	UND - UNDETERMINED	0.1	Decommission Existing Road
J60462-C	UND - UNDETERMINED	0.5	Decommission Existing Road
J60462-D	UND - UNDETERMINED	0.2	Decommission Existing Road
J60462-E	UND - UNDETERMINED	0.2	Decommission Existing Road
J60462-F	UND - UNDETERMINED	0.7	Decommission Existing Road
J60462-G	UND - UNDETERMINED	0.2	Decommission Existing Road
J60462-H	UND - UNDETERMINED	0.5	Decommission Existing Road
J60462-J	UND - UNDETERMINED	0.2	Decommission Existing Road
J60463-A	UND - UNDETERMINED	0.4	Decommission Existing Road
J60463-C	UND - UNDETERMINED	0.1	Decommission Existing Road
J60476	UND - UNDETERMINED	0.2	Decommission Existing Road
J60477	UND - UNDETERMINED	0.5	Decommission Existing Road
J60479	UND - UNDETERMINED	0.1	Decommission Existing Road
J60481	UND - UNDETERMINED	0.4	Decommission Existing Road
J60481-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60482	UND - UNDETERMINED	0.1	Decommission Existing Road
J60483	UND - UNDETERMINED	0.4	Decommission Existing Road
J60485	UND - UNDETERMINED	0.1	Decommission Existing Road
J60485-A	UND - UNDETERMINED	0.2	Decommission Existing Road
J60485-B	UND - UNDETERMINED	0.1	Decommission Existing Road
J60485-C	UND - UNDETERMINED	0.1	Decommission Existing Road
J60486	UND - UNDETERMINED	0.4	Decommission Existing Road
J60486-A	UND - UNDETERMINED	0.1	Decommission Existing Road
J60487	UND - UNDETERMINED	0.5	Decommission Existing Road
J60487-A	UND - UNDETERMINED	0.2	Decommission Existing Road

*Rounding may cause slight differences between table sums and final selected action whole miles.

APPENDIX C. Resource Protection Measures, Standard Operating Procedures, and Monitoring

Resource protection measures (RPMs) are incorporated into the Selected Action to mitigate the potential for unintended harm to the environment. The environmental effects displayed in Chapter 3 reflect the implementation and known effectiveness of these measures. Specific RPMs (Table C-1) have been identified for the project. In addition, the Lolo National Forest (LNF) has developed standard operating procedures (SOPs), which include best management practices (BMPs) that have been determined to be effective in minimizing potential environmental effects (see Table C-2). SOPs are applied to all projects.

Table C-1. Project-specific Resource Protection Measures

RPM	Resource Objective	Description of RPM	Unit/Location
SILV-1	Silviculture and Fuels	All treatments will be designed to be consistent with fuel reduction and forest health objectives and treatments supported by scientific principles.	Vegetation Treatment Units
SILV-2	Silviculture and Fuels	Fire-tolerant trees, primarily larch and ponderosa pine, will be retained first, but trees of all species in a stand may be represented after treatment. Dominant, large, healthy Douglas-fir will be emphasized for retention in conjunction with larch and ponderosa pine where practical.	Vegetation Treatment Units
SILV-3	Silviculture and Fuels	In intermediate harvests, canopy gaps needed to reduce crown fire potential will be created by removal of suppressed, intermediate, and codominant trees and retention of codominant and dominant trees to a targeted density.	Vegetation Treatment Units
SILV-4	Silviculture and Fuels	Ladder fuels will be reduced by selective slashing.	Vegetation Treatment Units
SILV-5	Silviculture and Fuels	Surface fuels will be managed by variety of methods including, but not limited to whole tree yarding, burning, piling and burning, lopping and scattering.	Vegetation Treatment Units
SILV-6	Silviculture	Treatments in stands meeting Green et al. (2011) old growth definitions will retain structural components such that the stand will still meet old growth definitions after treatment. Past or current beetle activity will be monitored to ensure mortality facilitated by Douglas-fir beetle is removed and beetle activity can be sanitized in order to reduce risk of additional mortality of old-growth size classes at the expense of bark beetle infestation.	Vegetation Treatment Units
SILV-7	Silviculture	Treatments involving the removal of ponderosa pine will include stumps treatments with Sporax® or similar approved borax stump treatment to prevent the spread of P-type *annosus* with the stands.	Vegetation Treatment Units

RPM	Resource Objective	Description of RPM	Unit/Location
SILV-8	Silviculture	Avoid removal of large diameter ponderosa pine and western larch (i.e. greater than 20-inch dbh) to the extent possible when locating landings, skid trails, and skyline corridors.	Vegetation Treatment Units
SILV-9	Silviculture	Silvicultural prescriptions will favor the retention of the largest, healthiest dominant/co-dominant long-lived, and fire-adapted tress to the degree possible to meet unit objectives.	Vegetation Treatment Units
SILV-10	Silviculture	In MA 21, retain all trees greater than 20-inch dbh of the healthiest dominant/co-dominant trees that are not projected to experience insect and disease mortality.	Management Area 21
SILV-11	Silviculture	In MA 21, retain all western larch and ponderosa pine tree species of all size classes.	Management Area 21
SILV-12	Silviculture	Follow NF Guidance for Snags (The diameter and number of snags and large wood to retain is contained within Appendix N of the Forest Plan).	Vegetation Treatment Units
SOIL-1	Soils Harvest Operations – *To maintain soil productivity and reduce detrimental soil disturbance.*	**All Untethered Ground-based Harvest** will be limited to slopes of 35 percent or less in accordance with the Forest Plan (Appendix G-1), except for short pitches (35-45 percent and less than 100 feet in length). Further exceptions to these measures will be reviewed by a Soil Scientist and follow the RPMs for Steep Slope Harvest Operations.	Vegetation treatment Units
SOIL-2	Soils Sensitive Soil Moisture Features within Units *To maintain soil productivity and reduce detrimental soil disturbance on sensitive soil areas important to watershed and riparian functions.*	• A **no-heavy equipment buffer** is to be placed around all moisture-laden or unstable toe slopes, isolated depressions, seasonal natural drainage channels and ephemeral draws (concave areas that collect surface and subsurface water and flow water for short periods following rainstorms or snowmelt). • Sensitive moist-wet soil features are often indicated by the presence of moist-site/riparian vegetation such as sedges, lady ferns, sword fern, dogwood, alder, horsetail, skunk cabbage • Locate skid trails and landings away from wet areas and natural drainage systems/ephemeral draws and divert runoff to stable areas. • Trees can be felled to lead or lined out of the no-heavy equipment buffer. Equipment may cross the ephemeral draw at designated crossings when soils are dry.	Vegetation Treatment Units
SOIL-3	Soils Soil Cover - Woody Material, Slash *To maintain soil productivity and mitigate project disturbances.*	In harvest units where areas of bare soil greater than 100 ft^2 are exposed on skid trails or falling and yarding corridors following harvest, available slash of mixed sizes (at least 50 percent <6 inches diameter) will be placed over skid trails or corridors. Slash will cover approximately 65−70 percent of the skid trail or corridor to a depth of approximately 2−3 inches where available (approximately 10-15 tons/acre).	Vegetation Treatment Units

<table>
<tr><th>RPM</th><th>Resource Objective</th><th>Description of RPM</th><th>Unit/Location</th></tr>
<tr><td>SOIL-4</td><td>Soils
Coarse Woody Debris (CWD)
To support soil productivity, wildlife habitat, vegetative and ecosystem function.</td><td>• Following harvest and fuels treatments, down CWD amounts in treatment units should meet at least the minimum amounts in tons/acre displayed in table below by broad potential vegetation type. Place emphasis on retaining or recruiting the largest diameter CWD. CWD material should be a minimum 3-6 in. diameter at small end, and a minimum 6 ft. length.
• Refer to LNF Down Woody Material Guide (Stewart et al. 2006) for more guidance on CWD ranges and resource considerations. CWD retention and recruitment measures could include: leaving available cull material longer than 6 feet or other noncommercial material in the unit (operational trees, snags felled for safety reasons); leaving larger diameter limbs and tops in the unit; returning yarded non-commercial and cull material from the landing back into the unit; assure machine- and hand-piling activities consider CWD needs; implement post-harvest and other prescribed burning practices that retain existing CWD to meet needs.
• Site-specific exceptions to leave lesser amounts may be developed through interdisciplinary assessment to assure resource needs are met:
1) Where minimum CWD quantities are not available; or
2) Within the WUI and around high-value resources (e.g., power lines, communication towers, developed recreation sites, recreation residences, adjacent private land, and structures.
<table><tr><th colspan="2">Minimum quantities of coarse wood debris after vegetation management</th></tr><tr><td>Broad potential vegetation type</td><td>Minimum coarse wood debris (tons/acre)</td></tr><tr><td>Cold and Cool moist</td><td>7</td></tr><tr><td>Warm Moist</td><td>10</td></tr><tr><td>Warm Dry</td><td>5</td></tr></table>• Vegetation treatments located in MA21 will retain greater than 15 tons of dead and down material per acre.</td><td>Vegetation Treatment Units</td></tr>
</table>

RPM	Resource Objective	Description of RPM	Unit/Location
SOIL-5	Soils Temporary Roads *To improve soil productivity.*	Level of temporary road decommissioning will depend on the existing condition of the site prior to road or trail construction and will be decommissioned following site-appropriate combinations of the following: •Newly constructed temporary roads will be fully recontoured along the entire length. Available slash, CWD and other organic material will cover approximately 65−70 percent of the road to a depth of approximately 2−3 inches where available (approximately 10-15 t/a). •Topsoil and slash will be stored along the temporary road to the greatest extent possible and pulled back over the road surface during decommissioning. •The temporary road surface will have site preparation to a depth of at least 6 inches. Site preparation may include recontouring, de-compaction, and/or scarification. •Site will be seeded using appropriate LNF native grass mix, with seeding occurring prior to slash placement. •By purchaser agreement, in lieu of waterbars, slash of mixed sizes (at least 50 percent <6 inches diameter) will be placed over temporary roads and excaline trails to prevent erosion in units. Slash will cover approximately 65−70 percent of the road or trail to a depth of approximately 2−3 inches where available (approximately 10-15 t/a).	All temporary roads in the project area
SOIL-6	Soils Recreation trails *To reduce erosion and mitigate project disturbance*	• Discourage or prohibit off-trail travel. Informal trails created by off-trail travel frequently have steep grades and fall-line alignments that quickly erode, particularly in the absence of tread maintenance. Exceptions include areas of solid rock or non-vegetated cobble. • Design trails with sustainable grades and avoid fall-line alignments • When possible, build trails in dry, cohesive soils that easily compact and contain a larger percentage of coarse material or rocks. These soils better resist erosion by wind and water or displacement by feet, hooves and tires. • Minimize tread muddiness by avoiding flat terrain, wet soils, and drainage bottom locations. • Use grade reversals to remove water from trail treads. Grade reversals are permanent and sustainable - when designed into a trail's alignment they remain 100 percent effective and rarely require maintenance.	All new recreation trails

RPM	Resource Objective	Description of RPM	Unit/Location
SOIL-7	Soils Mechanical Piling *To maintain soil productivity and reduce detrimental soil disturbance.*	• In units where mechanical piling may occur, ground-based equipment will reuse existing skid trails where practical. Plan activities to minimize the amount of area receiving machine traffic and soil disturbance from piling operations. Pile in a manner that minimizes disturbance to duff and topsoil and prevents piling soil into slash piles. Focus machine-piling where required to address heavy fuel-loading and avoid excess unnecessary machine disturbance in areas that are within acceptable loading guidelines or can be piled by hand. •Tracked equipment will be used and is restricted to slopes 40 percent. •Activities can occur when soil moisture is sufficiently low to prevent detrimental soil disturbance (DSD), or when adequate winter logging conditions exist with a sufficient depth of packed snow and/or frozen ground.	All vegetation treatment units where mechanical piling may occur
SOIL-8	Soils Mastication *To reduce DSD*	In treatment units where mastication is used, the following requirements will be applied: • Tracked equipment will be used and be restricted to slopes less than 35 percent. Exceptions may be made as approved by a United States Forest Service (USFS) Soil Scientist to allow operation on slopes up to 40 percent, depending on site characteristics such as soil type and existing soil disturbance. Exceptions may also be made to allow operations on up to 40 percent slopes on existing disturbed trails, roads, or on adequately frozen soil or snowpack. • Activities can occur when soil moisture is sufficiently low, or when adequate winter logging conditions exist with a sufficient depth of packed snow and/or frozen ground. • Plan activities to minimize the amount of area receiving machine traffic needed to meet objectives. Travel on existing disturbed areas when available, minimize the number of passes, and designate travel routes and sensitive areas to avoid. • Operate machinery on slash and/or masticated material to protect soils. • CWD requirements regarding size of pieces and tons/acre are applicable (see SOIL-4). • Give preference to a boom-mounted cutting head to avoid driving to each tree and provide for more maneuverability and lower impacts in complex terrain.	All vegetation treatment units where mastication may occur
SOIL-9	Soils Minimize new DSD and rehabilitate areas of DSD in treatment units *To meet Region 1 Soil Quality Standards (SQS)*	Ten proposed treatment units are estimated to be at or exceed 15 percent DSD (15-20 percent DSD) following project activities based on this analysis. Prior to and during implementation, site-specific review of these units involving a soil specialist will occur to ensure any necessary preventative and rehabilitative actions are taken to result in post-project DSD levels not exceeding 15 percent. In addition to other soil RPMs included in this project, preventative actions may include restricting operations to existing disturbed areas, operating only with adequate winter conditions, restrictions on post-harvest mastication or machine-piling, and avoiding specific sensitive or highly disturbed portions of units. Rehabilitative actions to improve soil productivity in the long-term and reduce DSD include decompaction, scarification, replacing/recovering displaced topsoil, covering disturbed areas with slash, mulch, coarse woody material, planting and/or seeding with native species (see LNF Soil Rehabilitation Guide 2018 for guidance).	Vegetation Treatment Units 7, 14, 15, 100, 166, 400, 405, 410, 415, and 420

RPM	Resource Objective	Description of RPM	Unit/Location
WILD-1	Wildlife *Grizzly bear*	Newly constructed permanent roads that will not be open to the public will be gated immediately upon construction.	Project Area
WILD-2	Wildlife *Grizzly bear*	Require all contractors and force account crews working in the project area to follow the LNF Food Storage Order.	Project Area
WILD-3	Wildlife *Grizzly bear*	New temporary routes and temporary use of restricted routes will not be on the landscape for more than 5 years.	Project Area
WILD-4	Wildlife *Grizzly bear*	Work within modeled grizzly bear denning habitat will occur during the non-denning season (April 1– November 30).	Treatment Units 26, 37, 43, 133, 166, 221, and 244 Project area where road management activities intersect denning habitat.
WILD-5	Wildlife *Grizzly bear*	Helicopter landings will be at lower elevations near the underburn units or at an airport.	Project Area
WILD-6	Wildlife *Grizzly bear*	Within the Primary Conservation Area, use of restricted roads will be limited to six trips (3 round trips) per week or one 30-day unlimited use period during the denning season (December 1-March 31). (Northern Continental Divide Ecosystem Standard – AR-01)	Project Area
WILD-7	Wildlife *Grizzly bear*	Low-altitude helicopter/drone activity below 500 feet above ground level should not need to occur more than 10 days per year during any given year of project implementation	Project Area
WILD-8	Wildlife *Wolverine*	No road work will occur within wolverine primary habitat or maternal habitat between January 15 and May 15.	Project Area
WILD-9	Wildlife *American goshawk*	For active goshawk nests, project actions will not occur from March 15 to August 15 within a 40-acre buffer around the nest site. Within the 420-acre post-fledging area (PFA) surrounding each nest, no treatments will occur from April 15- August 15, to avoid disturbance to the birds. Prescriptions will be altered, if needed, to ensure sufficient closed-canopy forest will remain within the PFA post-treatment.	Project Area
WILD-10	Wildlife *Flammulated owl*	Avoid vegetation removal (including using large machinery as well as chainsaws) during the nesting season (May 1 through August 1) in units where flammulated owls have been detected. Burning may occur in May, if necessary, but will not occur June 1 through August 1.	Vegetation Treatment Units

RPM	Resource Objective	Description of RPM	Unit/Location
WILD-11	Wildlife *Bald eagle*	For active bald eagle nests, project actions will not occur within 1 mile from February 1 through August 15 unless the nest is not active for the year. Surveys of the nest will need to be completed each year to determine whether the nest is active and apply the timing limitation accordingly. Other activities are not expected to result in harm to individual eagles, damage to a nest, or excessive disturbance.	Vegetation Treatment Units
WILD-12	Wildlife *Grizzly bear*	To reduce human-bear conflict, bear-aware educational signs will be installed at proposed mountain bike trailheads to inform trail users of possible bear activity in the area.	Proposed mountain bike trails
WILD-13	Wildlife *Canada lynx*	Prior to implementing vegetation and fuel treatments outside of the WUI as defined by HFRA, ground truth/validate proposed treatment acres for lynx habitat. If lynx habitat is found present within treatment acres, the NRLMD standards and guidelines will be followed.	Vegetation Treatment Units
BOT-1	Protection of TES plant species *Whitebark pine*	A 33-ft avoidance buffer will be applied around identified whitebark pine individuals.	MU-304
INV-1	Invasive plant species	Haul routes will be treated with herbicide before and after final completion of haul activities.	Haul routes
INV-2	Invasive plant species	Include in all contracts the standard Contract Provisions: C/CT6.351 (or equivalent) – Washing Equipment: Clean and inspect all off-road equipment of mud, dirt, and plant parts before moving into project area. Cleaning must occur off USFS lands. Once equipment has been used, re-clean before transporting outside project area.	Project Area
INV-3	Invasive plant species	Weed treatments will tier to Lolo National Forest Integrated Weed Management Plan (U.S. Department of Agriculture 2007b), including approved herbicides, treatment strategies, and mitigation measures. Implement mitigation measures 1 through 48 (starting on page 28 of Lolo National Forest Integrated Weed Management EIS (U.S. Department of Agriculture 2007a)). These include evaluating the weed site for sensitive plant habitat, implementing Region 1 weed prevention practices and BMPs, following herbicide application law, and posting signs where herbicides are applied.	Project Area (per Weed EIS)
INV-4	Invasive plant species	New invaders, as identified by local and state agencies, will be given high priority for treatment.	Project Area
VIS-1	Protection of Scenery/Visuals Resources	Treatments should follow natural topographic breaks and changes in vegetation. Minimize straight lines and geometric shapes to create vegetative shapes that mimic natural patterns.	Vegetation Treatment Units
VIS-2	Protection of Scenery/Visuals Resources	Unit edges will be shaped and/or feathered to avoid a shadowing effect in the cut unit. Feathering should be a gradual transition between treated and non-treated areas. Where the unit is adjacent to denser forest, the percent of thinning within the transition zone will be progressively reduced toward the outside edge of the unit. Where the unit interfaces with an opening, the percent of thinning within the transition zone will be progressively increased toward the outside edge of the unit. In addition, vary the width of the transition zone.	Vegetation Treatment Units

RPM	Resource Objective	Description of RPM	Unit/Location
VIS-3	Protection of Scenery/Visuals Resources	Maintain pockets of untreated areas to provide view diversity.	Vegetation Treatment Units
VIS-4	Protection of Scenery/Visuals Resources	Leave approximately 15−20 percent of the small understory trees in all units for visual variety. This can be accomplished by leaving individual trees as well as leaving trees in clumps.	Vegetation Treatment Units
VIS-5	Protection of Scenery/Visuals Resources	Leave trees in all units will be left in irregular patterns in an effort to mimic the natural vegetation patterns characteristic of the area.	Vegetation Treatment Units
VIS-6	Protection of Scenery/Visuals Resources	Unless unsafe for contractors, all stumps will be cut low (less than 6 inches) within 300 feet, or visual sight distance if less than 300 feet, of Highway 83.	Vegetation Treatment Units
VIS-7	Protection of Scenery/Visuals Resources	For all units adjacent to high traffic travelways, cut tree mark or mark units in such a way that no long-term timber marking paint is visible (i.e., water-based paint can be used; lasts ~3 years) from the main viewpoints within the project area.	Vegetation Treatment Units
VIS-8	Protection of Scenery/Visuals Resources	Use only corner boundary markers for the unit boundary marking along Highway 83. Unit boundaries will be marked with water-based paint throughout project.	Vegetation Treatment Units
VIS-9	Protection of Scenery/Visuals Resources	If vegetation clearing is needed at landings, shape edges are to mimic natural patterns and openings.	Vegetation Treatment Units
VIS-10	Protection of Scenery/Visuals Resources	Where new temporary roads, snow roads, or ski trails meet a primary transportation route they should intersect at a right angle, where feasible, and curve after the junction to minimize the length of route seen from the primary transportation route.	Vegetation Treatment Units
VIS-11	Protection of Scenery/Visuals Resources	For units in viewing corridor of Highway 83 and Road 4370, locate landings outside of view where possible. Once management activities are complete, scatter slash and debris evenly in landings and revegetate. Disperse planting and seeding to mimic existing patterns of the vegetative mosaic.	Vegetation Treatment Units
VIS-12	Protection of Scenery/Visuals Resources	When doing reconstruction activities, include pullouts for viewing at vista cut units and past harvest units providing vistas which minimize soil disturbance and exposed soils on road cuts and fills.	Vegetation Treatment Units
REC-1	User Conflict Management to Nordic Trails	Avoid vegetation treatments near the Nordic Trail System during the winter operating season when the trails are in use by skiers.	Seeley Creek Nordic Ski Area

RPM	Resource Objective	Description of RPM	Unit/Location
REC-2	User Conflict Management in Developed Campgrounds	Avoid vegetation treatments in and near developed campgrounds during the summer operating season (Memorial Day to Labor Day).	Vegetation Treatment Units
REC-3	Non-motorized Recreation Opportunities	Retain an approximate 12- to 18- inch-wide flat surface on decommissioned roads for non-motorized access where practical.	Project Area

Table C-2. Standard Operating Procedures

Standard Operating Procedure	Unit/Location
Soils	
Summer Operating Conditions: Ground-based harvest will only occur on dry soils. Soil moisture will be evaluated at the bottom of the root tight layer (2-6 inches below soil surface). Refer to Table B1 in Soil File 3 (LNF Ground-Based Harvest Guidelines) for dry soil, field assessment information. **Winter Operating Conditions (Optional):** Winter operating conditions require frozen soil or 18 inches of settled snow, or a combination of both, sufficient to support equipment and protect soil surface. Because the depth of snow necessary to protect forest floor varies with snow density, less than 18 inches of snow will be approved by the TSA under favorable winter conditions.	Summer Operating Conditions: Vegetation Treatment Units Winter Operating Conditions: Optional for all vegetation treatment units
• Existing landings will be re-used to the extent possible. • In highly accessible areas along open roads, barriers will be placed to block motorized access into landings • Landing rehabilitation (erosion control) will occur on dry soils and will be completed as follows: o Landing site preparation (scarification) to a depth of 4-6 inches will occur. o Place slash material throughout site 3-6” thick. o Site will be seeded using direction in the botany SOPs.	Vegetation Treatment Units
• Existing skid trails and landings will be reused to the extent possible in order to limit new soil disturbance. • Skid trails will be spaced 75 to 100 feet apart to minimize soil disturbance of the harvest footprint. • By purchaser agreement, in lieu of waterbars, slash of mixed sizes (at least 50 percent < 6 inches diameter) will be placed over skid roads to prevent erosion in units. Slash will cover approximately 65−70 percent of the road or trail to a depth of approximately 2−3 inches (approximately 10-15 t/a).	All ground-based vegetation treatment units

Standard Operating Procedure	Unit/Location
If approved, steep slope harvest activities will include the following practices: • If timber sale purchaser requests use of ground-based equipment on slopes that exceed 35 percent beyond the exception for short pitches described in SOIL-1, guidance provided in the "Lolo NF Steep Slope Analysis Process" document (Soil File 3) will be followed for planning, implementation, and monitoring. • Where ground-based harvest exceeds 35 percent slope (steep slope or tethered operations), harvest activities must be mitigated by operating with machinery under constant tension, working on a slash mat, or a combination of both (unless untethered exceptions are reviewed and approved by a soil scientist, see Table B-1, SOIL-1 above). • Harvest operation for untethered machinery will not exceed 45 percent slopes. • Harvest operations for tethered machinery will not exceed 70 percent slopes, unless site- and equipment-specific review determines these operations are suitable and will result in acceptable effects ("Lolo NF Steep Slope Analysis Process" document [Soil File 3]). • Planning, implementation, and monitoring of steep slope units will follow guidance provided in the "Lolo NF Steep Slope Analysis Process" guidance document (Soil File 3). • If during implementation the USFS determines that DSD reaches unacceptable levels for a harvest unit (15 percent DSD), operations will be paused for assessment and adjustment, and rehabilitation may be required. Rehabilitation may include a combination of the following: recovery of displaced topsoil, decompaction or scarification, slash placement, erosion control, and revegetation techniques as prescribed by the USFS Soil Scientist.	Vegetation treatment units where slopes exceed 35 percent
Aquatics	
Delineate Inland Native Fish Strategy (INFISH) Riparian Habitat Conservation Areas (RHCAs) boundaries along both sides of streams and wetlands prior to activities. Modifications can be approved by Fisheries Biologist or Hydrologist for treatments within RHCAs on a site-specific basis pending review of INFISH riparian management objectives and additional mitigation measures (e.g., allow felled trees to remain on the ground within RHCAs). INFISH categories and buffer distances: 1. INFISH Category 1: 300-foot RHCA buffer (600-foot including both sides) for perennial, fish bearing streams. 2. INFISH Category 2: 150-foot RHCA buffer (300-foot including both sides) for perennial, non-fish bearing streams. 3. INFISH Category 3: 150-foot RHCA buffer (buffer around perimeter) for landslide prone areas and ponds/lakes/reservoirs/wetlands with area greater than 1-acre. 4. INFISH Category 4: 50-foot RHCA buffer (100-foot including both sides) for intermittent streams, landslide prone areas, and ponds/lakes/reservoirs/wetlands with area less than 1-acre outside an INFISH priority watershed. Extend RHCA buffer to 100-foot (200-foot including both sides) for these features if they lie within a priority watershed.	Project Area
Boundaries of wetlands and RHCAs will be flagged prior to ground-based activities to exclude equipment and other activities.	Project Area
All stream/wetland buffers are modified to 50 feet for the ignition of prescribed fire. Site visit by fisheries biologist determined this distance is sufficient to preclude waterway contamination from accelerants. Firelines constructed by hand are permitted within the 50-foot buffer only where there are no natural features to control the fire and will be repaired following use. After ignition up to the 50-foot buffer, fire will be allowed to burn into the buffer and across streams/wetlands as fire is a natural disturbance mechanism that contributes to natural function and INFISH riparian management objectives.	Vegetation Treatment Units

Standard Operating Procedure	Unit/Location
During project layout, field personnel will identify any additional wet areas and/or stream channels and notify appropriate water and/or fisheries specialist and botanist regarding any special management requirements that might be required.	Project Area
BMP measures will be implemented on riparian roads prior to log haul. Common BMPs include but are not limited to: • Road surface shape/material (narrowing, crowning or sloping, graveling, dust abatement, etc.) • Surface drainage (drain dips, open tops, etc.) • Ditch lines (lead-outs, sediment basins, relief culverts, general cleaning, etc.) • Slash filter windrows (stream crossings, ditch relief pipes, known sediment sources, etc.) • Other erosion control as needed (silt fences, straw bales, sediment wattles, etc.) Implementation will occur when roads are not excessively wet. BMP functionality will be maintained through completion of log haul.	Haul roads
Prior to hauling commercial product on any given road segment, BMP and associated soil and water conservation practices designed to control surface drainage from roads will be in place.	Haul roads
BMPs will be inspected at the end of each operating season to assure their ability to protect water quality during spring snowmelt runoff season and will be maintained to ensure functionality.	Haul roads
BMPs on haul routes will be functional when activities are finished.	Haul roads
Short-term BMP actions will be implemented on an as needed basis and include silt fences, straw bales, or other temporary effective measures to reduce sediment from reaching streams.	Haul roads
If winter haul occurs: • Snow plowing will maintain a minimum 2 inches of snow on the roadway to protect the road surface. All debris except snow and ice that is removed from the road surface and ditches shall be deposited away from stream channels at agreed locations. • Snow berms will not be left on the running surface of the road. Berms left on the shoulder of the road will be removed and/or drainage holes will be opened and maintained in them. Drainage holes will be spaced as needed to obtain satisfactory surface drainage without discharge on erodible fills. • Ditches and culverts will be kept functional during and following road use. Culverts will be marked before snow, so they can be located and cleared of debris as needed to keep them functioning. This will aid equipment operators from crushing the inlet and outlet of culverts.	Haul roads
Erosion control measures will remain in place and functional until disturbed sites (such as roads, culverts, landings, and burn piles) were stabilized, typically for at least one growing season after ground-disturbing activities. Inspection and maintenance will occur following high rainfall events and prior to fall and spring runoff to ensure effectiveness.	Project Area
Forestry BMPs will be utilized to minimize effects to soil and water.	Vegetation Treatment Units
New road construction will occur during dry weather periods unless otherwise agreed to with a watershed specialist (hydrologist or fisheries biologist).	New road construction

Standard Operating Procedure	Unit/Location
If any instream work is needed (i.e. stream crossing structure installation/replacement/removal, a Stream Protection Act (SPA 124) permit will be required, and implementation will be subject to the general and special conditions contained therein. The fisheries biologist and/or hydrologist will be notified prior to stream crossing removals and replacements.	Project Area
Store fuel and refuel all vehicles outside of RHCA buffers.	Project Area
Utilize natural pools or other high-volume stream locations when drafting water to avoid the need to modify stream bed or banks (i.e., avoid constructing dams/diversions with rocks, tarps, or other material to concentrate water).	Project Area
Handline may be anchored within the RHCA buffer where necessary but will be limited to the extent possible (esp. soil disturbance).	Project Area
Wildlife	
Snags and snag replacements will be retained in timber harvest units consistent with the Lolo National Forest Dead and Down Habitat Components Guidelines (1997) and Appendix N of the Forest Plan. Unless specified for removal in the silvicultural prescription, snags will remain within treatment areas. Snags that need to be cut for safety or operational reasons will remain in the unit.	Vegetation Treatment Units
Wildlife features such as wallows, mineral licks, and seeps will be protected.	Vegetation Treatment Units
Botany	
The Lolo NF Seeding and Revegetation Guidelines, available in the botany project record, will be used for detailed procedures and appropriate mixes. The Forest Native Plants Coordinator or the botanist will be consulted if changes to the seed mix are necessary due to supply. Restricted species (FSM 2070) will not be included. Where prescribed by a botanist or soil scientist, tree and shrub planting may also be used as a revegetation technique. Tree and shrub ordering procedures and planting guidance are available in the Lolo NF Seeding and Revegetation Guidelines.	Project Area
If new occurrences of federally listed, proposed, or Region 1 sensitive plants are detected within the project area, the USFS botanist will be contacted immediately so protective measures may be revised or newly prescribed. This could include dropping units from activities, modifying unit boundaries, additional buffers, or activity timing restrictions.	Project Area
Changes to the project during layout that could cause impacts that vary from what was analyzed (e.g., increased canopy cover reduction or logging system change) will be reviewed by a qualified USFS botanist, and rare/sensitive plant surveys will be conducted as necessary prior to project implementation.	Project Area

Standard Operating Procedure	Unit/Location
Weeds	
The following list includes several Regional BMPs and mitigations from the 2007 LNF Integrated Weed Management FEIS/ROD. 1. Soil disturbance would be minimized 2. Off-road equipment would be cleaned (power or high-pressure wash) of mud, dirt, and plant parts before moving into the area. 3. If gravel or other material is hauled for road surfacing, it would be from a site (pit) that has been previously treated for weeds and is currently weed free. 4. Disturbed sites would be seeded with native seed mixtures or appropriate Lolo seed mixtures. 5. Roads to be physically decommissioned (including temporary roads) or stored would be sprayed with at least one herbicide treatment before closure, if possible. 6. Straw and/or other material used for road stabilization and erosion control would be certified weed-free or weed seed-free. 7. Any use of herbicides for weed control would follow mitigation measures outlined in the Lolo National Forest's 2007 Integrated Weed EIS and Record of Decision to protect water resources. These measures include: a. All application of herbicides would be performed by, or supervised by, a state licensed applicator following all current legal application procedures administered by the Montana Department of Agriculture. b. All herbicides would be handled following Environmental Protection Agency label guidelines and other state and federal laws for storage, application, and disposal methods. c. Mixing would take place at least 150 feet from open water unless spill containment devices are readily available, and an anti-back siphoning device is used when drafting water. d. Applicators would review stream and wetland areas to ensure that herbicides would not be applied to open water. e. Herbicides would be used to water's edge only when absolutely needed and provided the product label allows such use. f. Herbicide applications near live water or in areas with shallow water tables would follow label directions. g. Herbicide applicators would not initiate spraying when heavy rains are forecast that could cause offsite herbicide transport into sensitive resources such as streams. h. Herbicide applicators would be familiar with and carry an Herbicide Emergency Spill Plan to reduce the risk and potential severity of an accidental spill. Herbicide applicators would also carry spill containment equipment. i. Herbicides would not be applied if snow or ice covers the target vegetation. j. Low boom pressure (less than 40 pounds per square inch) would be used to reduce drift. k. Drift reduction products would be used as needed near sensitive resources. l. Ground-based herbicide application would occur only when wind speed is 10 mph or less. m. If commercial applicators are used for the application of restricted use pesticides, USFS contract administrators would check to make sure their Montana commercial restricted use pesticide license is current.	Project Area
Heritage	
If previously unrecorded heritage resources are encountered during project implementation, activities will be halted, and a USFS archaeologist will be notified immediately. If necessary, additional mitigation measures will be developed in consultation with the Montana State Historic Preservation Office.	Project Area

Monitoring Activities

During and after project completion, monitoring will be conducted. Monitoring of project activities conducted under contract will occur during and immediately following contract implementation. All preparation and subsequent project-associated operations will be monitored by USFS representatives to ensure compliance with specifications.

Silviculture- Regeneration success in harvested areas will be monitored following standard procedures in USFS handbooks. As necessary, additional treatments will be implemented until stands met certification standards identified in silvicultural prescriptions.

Fuels & Fire- Post-burn monitoring will be completed on all burns to determine if objectives, as outlined in the Prescribed Fire Plan, are met. Post-burn monitoring will be accomplished through general observation and recorded in the prescribed fire plan.

Soils - Post-activity project monitoring is conducted using the National Soil Assessment Protocols on a random subset of project activity units. Post-activity monitoring is initiated 2-3 years following an activity to access soil recovery. Soil monitoring on the LNF is based on the 15 percent DSD threshold in compliance with R1 Soil Quality Standards (1999). A unit must have less than 15 percent of its area in detrimental soil conditions or the cumulative effects from project implementation and rehabilitation should not exceed the conditions prior to the planned activity and should move toward a net improvement in soil quality. If this threshold for change is reached, corrective actions should be taken to restore or stabilize the impacted site and move the unit towards a net improvement in soil quality. In the North Seeley project area, commercial activity units may be included in the LNF wide post-harvest soil monitoring efforts.

APPENDIX D. Response to Public Comments on the North Seeley Wildlife-Urban Interface – Highway 83 Project Environmental Assessment

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
162	5-AWR	Botany	Whitebark Pine	(162) The Forest Service wrote they found one whitebark pine in the area they want to log but they did not answer our question if they surveyed for white bark pine throughout the project area.	As stated in the Botany BE and the No Effect BA, surveys were conducted for TES species, which includes whitebark pine. Survey levels varied in intensity from general field checks to complete floristic surveys depending on the unit conditions. Survey maps and survey forms are provided in the project record. In addition to the negative result surveys for whitebark pine, whitebark pine species-specific habitat modeling does not include any suitable habitat within the proposed vegetation treatments (No Effect BA). RPM BOT-1 and SOPs regarding sensitive plants would also limit effects to stray whitebark pine occurring outside of suitable habitat. The analysis within the No Effect Biological Assessment, summarized in the EA section 3.8, determined there would be No Effect to whitebark pine, and thus formal consultation with the FWS for this species is not required.
163	5-AWR	Botany	Whitebark Pine	The Forest Service said there is no effect on whitebark pine even though they didn't survey for whitebark pine throughout the project area. Please formally consult with the FWS on the impact of the project on whitebark pine.	Refer to response to comment #162
147	5-AWR	Carbon/ Climate/ GHG	analysis	The federal district court of Montana recently ruled against the Kootenai National Forest on the same boiler plate analysis, writ¬ing: "Ultimately, greenhouse gas reduction must happen quickly, and removing carbon from forests in the form of logging, even if trees are going to grow back, will take decades to centuries to re-sequester. Put more simply, logging causes immediate carbon losses, while re-sequestration happens slowly over time, time that the planet may not have." Please find the court's order attached.	Based on the Forest Level Carbon Assessment, the impacts of Forest management on GHG and Carbon are minimal. Please refer to this document in the project record. A project-level analysis for GHG and Carbon was conducted to provide a quatitative assesment of the project's effects on the Carbon and GHG and demonstrates that the effects of the project are within the range of effects discussed in the Forest Level Carbon Assessment in the project record.
148	5-AWR	Carbon/ Climate/ GHG	analysis	Please follow NEPA and take a hard look at the impact of the project on climate change. In the EA, the Forest Service failed to take a "hard look" at the carbon and climate impacts of removing hundreds of thousands of trees from the Forest. The Forest Service dismissed the im¬pacts of logging these mature forests as "infinitesimal," ignoring years of science, agency guidance, and pertinent legal precedent, and failed to address the climate pollution caused by cutting, hauling, and processing timber.	Refer to response to comment #147.
149	5-AWR	Carbon/ Climate/ GHG	analysis	Council on Environmental Quality ("CEQ") guidance address¬ing climate change recognizes that logging and prescribed burn¬ing can impact carbon stores, and urges land management agencies' to "include a comparison of estimated net GHG emissions and carbon stock changes that are projected to occur with and without implementation of proposed land or resource manage¬ment actions." Please find attached, CEQ, Final Guidance for Federal Departments and Agencies on Consideration of Green¬house Gas Emissions and the Effects of Climate Change in Na¬tional Environmental Policy Act Reviews (Aug. 1, 2016) at 25-26, available at https://ceq.doe.gov/docs/ceq-regulations-and-guidance/nepa_final_ghg_guidance.pdf	Executive Order 14154 "Unleashing American Energy" revoked the previous Executive Order 13990 "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis", of which this referenced CEQ climate change guidance was a part.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
154	5-AWR	Carbon/ Climate/ GHG	analysis	Yet the EA fails to even provide a minimal quantitative analysis of project- or agency-caused CO2 emis- sions or consider the best available science on the topic. This is immensely unethical and immoral.	Refer to response to comment #147.
156	5-AWR	Carbon/ Climate/ GHG	analysis	The Forest Plan does not provide meaningful direction on cli¬mate change. Nor does the EA acknowledge pertinent and highly relevant best available science on climate change. This project is in violation of NEPA. The EA does not analyze or disclose the body of science that implicates logging activities as a contributor to reduced carbon stocks in forests and increases in greenhouse gas emissions.	Refer to response to comment #147.
157	5-AWR	Carbon/ Climate/ GHG	analysis	The EA fails to provide estimates of the total amount of carbon diox-ide (CO2) or other greenhouse gas emissions caused by FS man- agement actions and policies—forest-wide, regionally, or na¬tionally	Refer to response to comment #147.
158	5-AWR	Carbon/ Climate/ GHG	analysis	The best scientific information strongly suggests that manage¬ment that involves removal of trees and other biomass increases atmospheric CO2. Unsurprisingly the EA doesn't state that sim-ple fact. The EA fails to present any modeling of forest stands under dif¬ferent management scenarios. The FS should model the carbon flux over time for its proposed stand management scenarios and for the various types of vegetation cover found on the GNF. The EA also ignores CO2 and other greenhouse gas emissions from other common human activities related to forest management and recreational uses. These include emissions associated with machines used for log¬ging and associated activities, vehicle use for administrative ac¬tions, and recreational motor vehicles. The FS is simply ignoring the climate impacts of these management and other authorized activities.	Refer to response to comment #147.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
40	8-AFRC	Carbon/ Climate/ GHG	General Support	AFRC continues to stress that in the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes resulting in dead trees that would decay over time, emitting carbon to the atmosphere. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavasson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions. Finally, our forests currently absorb 11 percent of U.S carbon emissions, or 150 million metric tons of carbon a year, equivalent to the combined emissions from 40 coal power plants. However, starting in 2025, their ability to hold carbon may start plummeting and could emit up to 100 million metric tons of carbon a year as their emissions from decaying trees exceed their carbon absorption.	Thank you for your review of the project and your comment in support of the proposed action.
150	5-AWR	Carbon/ Climate/ GHG	literature	Numerous studies, including those by the Forest Service, have concluded that logging mature forests releases significant amounts of carbon stored in the trees by preventing such forests from continuing to sequester carbon in trees and roots. FS17007. When forest stands are cut down, the vast majority of the stored carbon in the forest is released over time as CO2, thereby con¬verting forests from a sink to a “source” or “emitter.” See FS7888 (study reporting “[i]ncreased harvest through proposed thinning practices in [Oregon] has been shown to elevate emis¬sions for decades to centuries regardless of product end use”).	Refer to response to comment #147.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
151	5-AWR	Carbon/ Climate/ GHG	literature	Please find attached, “The Enduring World Forest Carbon Sink: Key Findings and Policy Implications Forests play a critical role in mitigating climate change by sequestering carbon dioxide (CO2) from the atmosphere.” This new study led by Yude Pan, research scientist with the U.S. Department of Agriculture, For¬est Service, Northern Research Station, provides a unique per¬spective and a long-term, ground- based benchmark on the re¬cent magnitude, trends, drivers, and locations of Earth’s critical forest carbon sinks. It found that deforestation, degradation, and disturbances pose significant threats to forest carbon sinks. It recommends halting deforestation and degradation while in-creasing large-scale reforestation and afforestation are crucial for sustaining and enhancing forest carbon sinks.	Refer to the literature review in the project record for consideration of this literature.
153	5-AWR	Carbon/ Climate/ GHG	literature	Achievable future conditions as a framework for guiding forest conservation and management, Forest Ecology and Management 360 (2016) 80–96, S.W. Golladay et al. (Please, find attached).	Refer to the literature review in the project record for consideration of this literature.
18	7-Sun Mountain Lumber	EAD	General Support	We also appreciate the use of the Good Neighbor Authority and the Infrastructure Investment and Jobs Act’s Emergency Action Determination to expedite the implementation of this important work in one of Montana’s highest-risk firesheds. These tools allow for the timely, science-based action that the current wildfire crisis demands.	Thank you for your review of the project and your comment in support of the proposed action.
21	8-AFRC	EAD	General Support	AFRC is very pleased to see that this Project will be implemented as an Emergency Action Determination project.	Refer to response to comment #18.
47	9-F.H. Stoltze	EAD	General Support	We are pleased to see an Emergency Action Determination used to expedite the project. Use of this authority will increase the pace of the implementation. The community of Seeley Lake has been threatened in the past by the 2017 Rice Ridge fire. Reducing the risk now is crucial to preventing potential catastrophe in the future.	Refer to response to comment #18.
54	13-DNRC	EAD	General Support	DNRC recognizes the need to dramatically increase the pace and scale of fuel reduction work to reduce the impact of high severity fire and improve forest health. The Forest Service National Wildfire Crisis Strategy highlights the critical need to reduce the time involved with individual project planning through large scale and streamlined analysis. We commend the Lolo National Forest for utilizing the Emergency Action Determination to implement the –Hwy- 83 Project.	Refer to response to comment #18.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
66	5-AWR	EAD		Please demonstrate that there is an emergency that this re-quires this project.	The USFS may carry out Authorized Emergency Actions under section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58) on National Forest System (NFS) lands in 250 identified High Risk Firesheds. This authority has been granted to mitigate the harm to life, property, or important natural or cultural resources on USFS or adjacent land by modifying vegetation conditions to reduce potential wildfire intensity and severity; salvage dead or dying trees; sanitation harvest (commercial and noncommercial) to control insects or disease; and to remove hazardous trees near roads and trails. The project lies within 278 Condon and 341 Barite, identified among the 250 High Risk Firesheds.
71	5-AWR	EAD		Because the project is violating the Forest Plan, it does not qual¬ify to be classified as an emergency authority under the In¬frastructure Investment and Jobs Act (Section 40807) of Public Law 117-58.	The EA and associated resource specialist reports demonstrate compliance with the Forest Plan and other laws, regulations, and policy. Green et al. 2011 is used across the forest as the best available science for assessing old growth characteristics. However, old growth assessments in Management Area 21 specifically followed Forest Plan Standard 4 as required by the Forest Plan. Refer to the Vegetation Specialist Report and associated appendices for details.
205	14-NEC	EAD		The public needs to be provided the specific basis for identifying an emergency situation in the North Seeley project, as is required by the NEPA. What specific habitat conditions within these 36 square miles trigger emergency fire risks? These conditions likely will vary across the landscape, so they need to be individually defined, including how the proposed treatment units will address this emergency. What needs to be specifically defined is why the proposed treatments are fuels reduction activities, and not timber production activities. AS per the draft EA, it actually appears that almost all the treatment units have timber production as a goal, not fuels reduction. Specifically, how do timber production and fuels reduction activities differ from one another? This distinction is important, as the agency is violating the NEPA if timber production is the actual objective of emergency actions, not fuels reduction.	The USFS may carry out Authorized Emergency Actions under section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58) on National Forest System (NFS) lands in 250 identified High Risk Firesheds. This authority has been granted to mitigate the harm to life, property, or important natural or cultural resources on USFS or adjacent land by modifying vegetation conditions to reduce potential wildfire intensity and severity; salvage dead or dying trees; sanitation harvest (commercial and noncommercial) to control insects or disease; and to remove hazardous trees near roads and trails. The project lies within 278 Condon and 341 Barite, identified among the 250 High Risk Firesheds. Multiple fuel reduction activities are incorporated into the selected action, both commercial and non-commercial. See the EA Section 3.2 Forested Vegetation and Section 3.3 Fire, Fuels, and Air Quality and associated specialist reports regarding impacts of fuels reduction activities.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
207	14-NEC	EAD		The public needs to understand this cost effectiveness, given the vast resource damages this project will trigger on wildlife, including 3 threatened species, the grizzly bear, wolverine and lynx. How are the costs of emergency intervention to reduce fuels balanced against wildlife values? In this regard, why is there only one means of reducing emergency fuels? Why wouldn't there be multiple options, with varying levels of effectiveness and varying impacts to wildlife, for this massive project? It is clear that the Forest Service is using the emergency fuels exemption for the North Seeley project to avoid public objections being filed against this project in a landscape that includes grizzly bears, lynx, and wolverine. The presence of these threatened species requires expansive, not restricted, public involvement. With respect to the lynx, the agency has to date no actual evidence of the population trend in the Northern Rockies. As such, the rationale to degrade occupied and critical lynx habitat under the guise of a fire emergency for what appears to simply be an expedited timber management program misrepresents as well as conceals agency management practices and objectives to the public.	Multiple fuel reduction activities are incorporated into the selected action, both commercial and non-commercial. See Sections 3.8 and 3.9 of the EA and associated Biological Assessments and wildlife specialist reports regarding impacts of fuel reduction activities, by action, on wildlife species in the project area.
17	7-Sun Mountain Lumber	Economics	General Support	As a mill that relies heavily on a steady supply of timber from National Forest System lands, Sun Mountain Lumber understands firsthand the connection between active forest management, the health of our public lands, and the strength of Montana's wood products industry. Projects like North Seeley are not only vital for forest health but are also critical for the retention of mill and logging infrastructure necessary to carry out restoration work today and into the future	Thank you for your review of the project and your comment in support of the proposed action.
19	7-Sun Mountain Lumber	Economics	General Support	We strongly encourage the Forest Service to move forward with this project as proposed and to prioritize commercial and non-commercial treatments that achieve forest restoration goals while supporting the viability of local mills and logging contractors	Refer to comment response to comment #17.
34	8-AFRC	Economics	General Support	AFRC is pleased that the District has included providing wood products that contribute to local and regional economies as one of the Purpose and Needs. Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about $300 million annually. Without the raw material sold by the Forest Service, DNRC, and private landowners, these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, the industry would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. This Project lies in an area that can be accessed by most of the remaining sawmills in Montana that are reliant on federal timber supply. Timely and effective implementation is critical to maintaining this infrastructure.	Refer to comment response to comment #17.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
35	8-AFRC	Economics	General Support	AFRC believes the District did a good job of analyzing the economic feasibility and financial efficiency of the Project. The estimated value of the timber stumpage is $1.757 million. This is important for several reasons including financial support for post treatment activities. It is also very important because 25% of the receipts generated will be returned to the counties to fund essential services. Since 2000, the counties have been funded through the Secure Rural School (SRS) program in lieu of timber receipts. However, the SRS program has not been reauthorized by Congress and the counties will now have to rely solely on timber receipts to fund essential services.	Refer to comment response to comment #17.
48	9-F.H. Stoltze	Economics	General Support	It is good to see the district treating the such a large number of acres in the portion of the project area designated for timber management. We encourage the District to design sales in a way that are efficient and feasible, while still protecting the existing environmental resources. The high number of treated areas also means more wood products can be produced. Having a healthy forest products infrastructure allows for current and future forest treatments to remain economically viable to complete. This ensures that our forests remain healthy and local sawmills can continue contribute over $300 million to the state and local economies.	Refer to comment response to comment #17.
58	13-DNRC	Economics	Increased utilization	The proposed action aligns with the goals of the Montana Forest Action Plan (MFAP), including reducing wildfire risk and improving forest health across boundaries. Communities like Seeley Lake have social and economic ties with National Forest lands. Management decisions made by the Forest Service can have an impact on the economies of smaller, resource-based communities. Other goals of MFAP include enhancing local economies and retaining a forest industry in Montana. We urge you to consider a variety of ways to utilize material from this project. Though it may require funding for service contract work, removing logs for firewood, posts and poles, or other products could reduce the cost of treatment and would not only sequester carbon but also contribute to local economies.	See EA section 3.14.3: proposed action will support forest plan goal of providing sustained timber yield to support local economies by creating opportunities for harvest and sale of timber products. For more details, see the Eonomics Specialist Report.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
206	14-NEC	Fire/Fuels	EAD	The public also needs to know specifically how existing emergency conditions will be changed by intervention, and to what level? What is the expected decline in emergency fire risk as a result of this project? Also, what is the expected reduction in human mortality risk from this project, as well as the savings that will occur from protection of structures? As per protection of structures from damage, what is the actual cost effectiveness of implementing this emergency project compared to savings expected from structure protection?	The EA and associated fire specialist report discloses the modeling results that demonstrate fuel treatments in the project area would effectively reduce wildfire severity (e.g. flame lengths, fireline intensity and the potential for active and passive crown fire). The “home ignition zone” (within 100 meters of a structure) concept was considered when designing this project. However, Cohen (2000) is not consistent with the management objectives of this project in that his recommendations address only structure protection and discourage fuel management outside the “home ignition zone” when the objective is specifically structure protection. Fuel management objectives in this project include managing fuels to alter fire behavior to reduce the source of firebrands, decrease the chance of fire threatening structures, and provide safer environments for fire suppression personnel. Fire researchers (Finney and Cohen, 2003), suggest that wildland fuel management extending perhaps many kilometers away from urban locations is critical to reducing the likelihood that wildland fires will spread to urbanized areas and pose ignition threats. Wildland fuel treatments can change fire behavior, which can increase the effectiveness of fire suppression, especially during initial attack, by slowing fire growth and limiting spotting (ibid.). This would reduce the risk of sustained high intensity wildfire in the wildland urban interface, which is an objective of the project.
133	5-AWR	Fire/Fuels	literature	The following quotes demonstrate that trying to restore lower severity fire regimes and forests through logging and other man¬agement activities may make the situation worse, compared to allowing nature to reestablish its own equilibrium. These state¬ments are found in “An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins, Volume 3 (ICBEMP):	This literature was not provided with the comment letter.
137	5-AWR	Fire/Fuels	literature	There is no evidence to support the claim that logging and build¬ing more logging roads reverses the treat of a severe wildfire. We believe that best available science shows that Commercial Logging does not reduce the threat of Forest Fires. What best available science supports the action alternatives?	The proposed action includes a variety of vegetation treatments, not just commercial logging, to reduce fire hazards. In the Fires and Fuels Specialist Report, four goals of fire behavior are outlined and principles of fire hazard reduction to meet these goals are discussed. In addition, the forested vegetation specialist report, Appendix 4 Scientific Basis for Restoration in the project record outlines the best available science considered for this project.
138	5-AWR	Fire/Fuels	literature	It is a violation of NEPA to not consider the best available sci¬ence. We asked you to consider Baker’s Fire Ecology in Rocky Mountain Landscapes and it is not even in your bibliography.	This literature was not provided with the comment letter.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
139	5-AWR	Fire/Fuels	literature	Please see the attached paper by Dr. William Baker titled: “Are High-Severity Fires Burning at Much Higher Rates Recently than Historically in Dry-Forest Landscapes of the Western USA?” Dr. Baker writes: “Programs to generally reduce fire severity in dry forests are not supported and have significant adverse ecological impacts, including reducing habitat for native species dependent on early-successional burned patches and decreasing landscape heterogeneity that confers resilience to climatic change.” Dr. Baker concluded: “Dry forests were historically renewed, and will continue to be renewed, by sudden, dramatic, high-in¬tensity fires after centuries of stability and lower-intensity fires.” Based on Dr. Baker’s paper, the proposed action will not meet the purpose and need of the project. Baker writes on p. 20: “Management issues. The evidence presented here shows that efforts to generally lower fire severity in dry forests for ecological restoration are not supported.” Dr. Baker’s paper is the best available science. Please explain why this project is not following the best availablescience. The Draft Decision Notice is in violation of NEPA.	This literature was considered and is cited in the Forested Vegetation Specialist Report, Appendix 4 Scientific Basis for Restoration.
140	5-AWR	Fire/Fuels	literature	Please see the attached paper by Baker et al. 2023. This land¬mark study found a pattern of "Falsification of the Scientific Record" in government-funded wildfire studies.	This literature supports the North Seeley analysis. The North Seeley analysis acknowledges and discusses the historic fire regimes found within the project area and recognizes the role of mixed-severity and high-severity fire on the landscape, which is incorporated into the historic reference condition for the project.
141	5-AWR	Fire/Fuels	literature	Faison et al. 2023 shows that the project is not meeting the pur¬pose and need of the project. Please find Faison et al. 2023 at¬tached.	Refer to the literature review in the project record for consideration.
142	5-AWR	Fire/Fuels	literature	Please find, “Wildland-urban fire disasters aren’t actually a wildfire problem,” by Calkin et al. 2023 attached. Calkin et al. 2024 found that to protect homes from wildfire we have to hard¬en homes, not cut and burn forests. The project area should be within 100 feet of homes not on For¬est Service and BL:M lands unless a home is within 100 feet of Forest Service and BL:M lands. The purpose and need are not based on the best available science and is in violation of NEPA, NFMA and the APA.	Refer to the literature review in the project record for consideration.
143	5-AWR	Fire/Fuels	literature	Please find Schoennagel et al (2004) attached. The draft decision is in violation of NEPA, NFMA, the ESA and the APA because the project will adversely affect biological di¬versity, is not following the best available since and the purpose and need will not work.	Refer to the literature review in the project record for consideration.
144	5-AWR	Fire/Fuels	literature	Please see the attached paper by Della-Sala 2022.	Refer to the literature review in the project record for consideration.
145	5-AWR	Fire/Fuels	literature	Please see the column below by Dr. Chad Hanson.	Refer to the literature review in the project record for consideration.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
146	5-AWR	Fire/Fuels	literature	Please see the article below about Logging and wildfire by Dr. Chad Hanson.	Refer to the literature review in the project record for consideration.
172	5-AWR	Fire/Fuels	literature	The commenter provides numerous citations with pulled direct quotes to argue against timber management as a method of fire management. See comment letter 5a pages 93-110 for full text.	The commenter provides numerous citations with pulled direct quotes to argue against timber management as a method of fire management. Multiple citations in this thread were not provided as full literature for review. For citations where literature was provided, refer to the literature review in the project record for consideration. To address the primary issue from the commenter regarding timber management as a method of fire management: The EA and associated fire specialist report discloses the modeling results that demonstrate fuel treatments in the project area would effectively reduce wildfire severity (e.g. flame lengths, fireline intensity and the potential for active and passive crown fire). The “home ignition zone” (within 100 meters of a structure) concept was considered when designing this project. However, fuel management objectives in this project include managing fuels to alter fire behavior to reduce the source of firebrands, decrease the chance of fire threatening structures, and provide safer environments for fire suppression personnel. Fire researchers (Finney and Cohen, 2003), suggest that wildland fuel management extending perhaps many kilometers away from urban locations is critical to reducing the likelihood that wildland fires will spread to urbanized areas and pose ignition threats. Wildland fuel treatments can change fire behavior, which can increase the effectiveness of fire suppression, especially during initial attack, by slowing fire growth and limiting spotting (ibid.). This would reduce the risk of sustained high intensity wildfire in the wildland urban interface, which is an objective of the project.
127	5-AWR	Fisheries	BMP/RPM	The project relies on BMPs to protect water quality and fish habitat. First, there is no evidence that application of BMPs actually protects fish habitat and water quality. Second, BMPs are only maintained on a small percentage of roads or when there is a logging project. BMPs fail to protect and improve water quality because of the allowance for “naturally occurring degradation.” In Montana, “naturally-occurring degradation” is defined in ARM 16.20.603(11) as that which occurs after application of “all rea-sonable land, soil and water conservation practices have been applied.” In other words, damage caused directly by sediment (and other pollution) is acceptable as long as BMPs are applied. The result is a never-ending, downward spiral for water quality and native fish.	See sections 3.6, 3.7, 3.8 of the EA as well as the hydrologist and aquatics specialist reports and the bull trout biological assessment. The project was analyzed with consideration that BMPs and RPMs reduce but don't completely eliminate impacts.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
120	5-AWR	Fisheries	Bull Trout	How will the North Seeley Lake project make the affect large systems of interconnected waterways for bull trout migrations?	Designated Bull Trout critical habitat in the project area is limited to a 1000' foot portion of the Clearwater River that runs near-perpendicular through the shaded fuel break treatment along Highway 83. Many project tributaties have fish passage barriers to the Cleareater River such that they are unlikely to become occupied by bull trout. See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators and the bull trout biological assessment, hydrology specialist report, and aquatics specialist report.
121	5-AWR	Fisheries	Bull trout	How will the North Seeley Lake project make the affect large systems of interconnected waterways for bull trout migrations?	Refer to comment response for comment #120.
109	5-AWR	Fisheries	Bull Trout	What are the redd counts in bull trout critical habitat in the project area? Please also provide the all the historical bull counts that you have in the project area?	Designated Bull Trout critical habitat in the project area is limited to a 1000' foot portion of the Clearwater River that runs near-perpendicular through the shaded fuel break treatment along Highway 83. Many project tributaties have fish passage barriers to the Cleareater River such that they are unlikely to become occupied by bull trout. Bull trout presence was determined using Montana Natural Heritage Program data which has the most up to date records as well as the Lolo NF eDNA Master List that can be found in the project record.
125	5-AWR	Fisheries	Bull Trout	When was the last time the project area was surveyed for bull trout? What was the results of these surveys?	Refer to comment response for comment #109.
118	5-AWR	Fisheries	Bull Trout	If the restoration work does not get done. How much sediment will go into the streams in the project area post-project? Forest Plan goals include contributing to the recovery of species listed as threatened or endangered under the Endangered Species Act. How does clearcutting and building more roads and adding non-system roads to the National Forest Service system helps bull trout and bull trout critical habitat recover?	RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian zones from treatment activities. The threat of sediment leaving the project area, crossing through RHCA buffers, and entering streams is low and would persist for approximately five to ten years for hauling activities to be completed. The protection of RHCA buffers would minimize negative cumulative effects from happening to other stream processes such as substrate composition, woody debris, and channel stability. See Table 14 and Table 15 of the hydrology specialist report , the aquatics specialist report, and the bull trout BA for details.
124	5-AWR	Fisheries	Bull Trout	How will this affect bull trout and bull trout critical habitat?	See EA section 3.8.1 for the analysis of bull trout and bull trout critical habitat, and the bull trout BA included as Appendix A of the Fisheries BE.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
119	5-AWR	Fisheries	Bull Trout	How will the North Seeley Lake project make the waters clearer in the short term? How will the North Seeley Lake l project make the waters cold¬er in the short term? How will the North Seeley Lake project make the gravel beds of the streams int he project area cleaner in the short and long term? How will the North Seeley Lake project make the affect deep pools in streams in the project area in the short and long term? How will the North Seeley Lake project make the affect com-plex cover over the streams in the project area in the short and long term? How will the North Seeley Lake project make the affect the in-stream flows in the fall in the short and long term?	See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators and the bull trout biological assessment, hydrology specialist report, and aquatics specialist report.
122	5-AWR	Fisheries	Bull Trout	How will the North Seeley Lake project affect the temperature of the streams in the project area including bull trout critical habitat? Will all of the proposed logging increase the temperature of the streams in the project area?	Refer to comment response for comment #119.
129	5-AWR	Fisheries	Bull Trout	Please fine Frissell's comments on bull trout recovery attached,	Refer to the literature review in the project record for consideration.
123	5-AWR	Fisheries	Bull Trout	Will all of the proposed road building and road use by log truck, clearcutting, and other logging put more sediment into streams in the project area?	RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian resources from transportation management activities. See section 3.7 of the EA and the aquatics specialist report for details. There are 154 miles of road proposed for decommissioning, which will offest the minimal miles of new construction and road improvements needed for haul activities.
128	5-AWR	Fisheries	Bull Trout	The U.S. Fish and Wildlife Service found that bull trout are ex-ceptionally sensitive to the direct, indirect, and cumulative ef¬fects of roads. Dunham and Rieman demonstrated that distur¬bance from roads was associated with reduced bull trout occur¬rence. They concluded that conservation of bull trout should in¬volve protection of larger, less fragmented, and less disturbed (lower road density) habitats to maintain important strongholds and sources for naturally recolonizing areas where populations have been lost. (USFS 2000, page 3-82.	See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators associated with road treatments. Formal Section 7 consultation was completed with the USFWS regarding bull trout and bull trout critical habitat.
115	5-AWR	Fisheries	Bull Trout	How many years it will take post-project to make up for all of the increase in sediment during the project? Will there be any bull trout left in the streams by then? How many bull trout will be killed during the implementation of the project?	The threat of sediment leaving the project area, crossing through RHCA buffers, and entering streams is low and would persist for approximately five to ten years for hauling activities to be completed. The protection of RHCA buffers would minimize negative cumulative effects from happening to other stream processes such as substrate composition, woody debris, and channel stability. Potential sedimentation from haul routes will last for the duration of project implementation. Project streams are not occupied by bull trout and any potential sediment delivery to the Clearwater River will be insignificant and discountable and not result in any bull trout mortality. See the hydrology specialist report for GRAIP-Lite modeling details and the bull trout BA for analysis of occupied/critical habitat.

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110	5-AWR	Fisheries	Bull Trout/WCT	The EA must fully and completely analyze the impacts to bull trout critical habitat and westslope cutthroat trout habitat.	See sections 3.7 and 3.8.1 for the EA and analysis of bull trout and bull trout critical habitat and westslope cutthroat trout. More detailed analysis can be found in the bull trout BA and aquatics specialist report.
116	5-AWR	Fisheries	Bull Trout/WCT	This project will adversely modify bull trout critical habitat. No increase in sediment should be occur. The project is in violation of PACFISH-INFISH, the ESA, NFMA, the Forest Plan, NEPA, and the APA.	Designated Bull Trout critical habitat in the project area is limited to a 1000' foot portion of the Clearwater River that runs near-perpendicular through the shaded fuel break treatment along Highway 83. RHCA buffers and RPMs would be applied to avoid impacts to streams and riparian resources from treatment activities. The potential for a short-term increase in sediment to occupied habitat is insignificant and discountable, and no long-term increase in sediment will occur. See the bull trout BA or section 3.8.1 of the EA for details.
112	5-AWR	Fisheries	General	How will this project affect native fish? What is the current condition in the riparian areas?	RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian resources from treatment activities. See section 3.7 of the EA and the aquatics specialist report for details on the effects to species and current conditions.
126	5-AWR	Fisheries	General	How will this project affect stream function, i.e., degrade, main-tain, restore?	See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators and section 3.6 Water resources and 3.7 Aquatics.
114	5-AWR	Fisheries	RHCA	Our data suggest that exclu¬sion of logging from riparian zones may be necessary to main¬tain natural stream morphology and habitat features. Likewise, careful upland man-agement is also necessary to prevent cumulative effects that re¬sult in altered water flow regimes and sediment delivery regimes.	RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian zones from treatment activities. See section 3.7 of the EA and the aquatics specialist report for details.
130	5-AWR	Fisheries	Roads	Trombulak and Frissell (attached)concluded that the presence of roads in an area is associated with negative effects for both ter¬restrial and aquatic ecosystems including changes in species composition and population size. (USFS 2000, pages 3-80-81).	This project will result in the reduction of roads in the long-term. See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators associated with road treatments and section 3.6 Water resources and 3.7 Aquatics. Refer to the literature review in the project record for consideration.
113	5-AWR	Fisheries	Roads	How will this project protect rather than adversely impact fish habitat and water quality? No logging or road building should be done in riparian areas. There should not be any stream crossings. Roads should be decommissioned and removed, not upgraded and rebuilt.	RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian resources from treatment activities. See section 3.7 of the EA and the aquatics specialist report for details. There are 154 miles of road proposed for decommissioning, which will offest the minimal miles of new construction and road improvements needed for haul activities.

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132	5-AWR	Fisheries	Roads	studies conducted by the Forest Service indicate that efforts to “manage" our way out of the problem are likely to make things worse. By "expanding our efforts in timber harvests to minimize the risks of large fire, we risk expanding what are well established negative effects on streams and native salmonids. The perpetuation or expansion of existing road net¬works and other activities might well erode the ability of [fish] populations to respond to the effects of large scale storms and other disturbances that we clearly cannot change." (Reiman et al 1997).	This project will result in the reduction of roads in the long-term. There are 154 miles of road proposed for decommissioning, which will offest the minimal miles of new construction and road improvements needed for haul activities.RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian resources from treatment activities. See EA section 3.8.1b for the status of bull trout indicators table and 3.8.1c for analysis of indicators associated with road treatments and section 3.6 Water resources and 3.7 Aquatics.
134	5-AWR	Fisheries	Roads/Timber Sales	Roads have adverse effects on aquatic ecosystems. They facili¬tate timber sales which can reduce riparian cover, increase water temperatures, decrease recruitment of coarse woody debris, and disrupt the hydrologic regime of watersheds by changing the timing and quantity of runoff. Roads themselves disrupt hydro¬logic processes by intercepting and diverting flow and contribut¬ing fine sediment into the stream channels which clogs spawn¬ing gravels. High water temperatures and fine sediment degrade native fish spawning habitat.	Refer to comment response for comment #132.
111	5-AWR	Fisheries	sediment	What is the standard for sediment in the Forest Plan? Sediment is one of the key factors impacting water quality and fish habitat. [See USFWS 2010]	Sediment is mentioned several times in the Lolo NF Plan. These mentions highlight the fact that proposed projects need to reduce/minimize/control the amount of sediment transport; this project aligns with this requirement in the long-term. See standards 15 and 28 in the Lolo NF plan for details. See sections 3.6 and 3.7 of the EA and the hydrology specialist report for sediment analysis.
1	2-Sheets	General	General Support	Fuels reduction and fire resistant forest management is long past due in the chain of lakes area. As the lowest and most developed portion of the valley between Seeley and Summit, a significant fire in this area would not only race uphill in either direction, but also cause the most loss to property and life of anywhere in the valley outside of the towns themselves. Heavy use exacerbates this risk, as users routinely launch fireworks and throw lit cigarettes out their vehicles while using areas such as rainy lake, the clearwater canoe launch, etc.	Thank you for your review of the project and your comment in support of the proposed action.
2	2-Sheets	General	General Support	As a resident the of immediately affected area, I wholly support and encourage the responsible management of our chain of lakes forest area.	Refer to reponse to comment #1

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3	3-Friede	General	General Support	I have experienced 4 micro burst wind events that closed the highway for several hours at a time. I have asked several Forest Service Rangers to address that extremely dangerous event but had no success. Why no one was ever hurt is beyond comprehension. Over the years I have been out on the highway at all time day and night. When you are working in the headlights removing trees and you hear more trees falling but can't see them you know you could get hit anytime. For years I endorsed thinning the tree canopy so the highway can get sun light to melt off in the winter. A thinned healthy tree canopy would also be healthier for the wildlife aswell. If you drive the highway you can see there are dead and dieing trees close to the road way that will be falling some time in the near future. The question is will they fall on the roadway and who is going g to hit the tree. (...) My opinion is, do the project it needs to be done.	Refer to reponse to comment #1
5	4-Seeley Lake Nordic	General	General Support	We are writing to express our full support for the proposed North Seeley Wildland Urban Interface-the Highway 83 Project, #64580	Refer to reponse to comment #1
10	6-SWCC	General	General Support	Overall, the SWCC thinks that the HWY 83 project is an important and timely project for addressing fuel mitigation needs in the Clearwater Valley. The east side of the Valley north of the community of Seeley Lake and east of HWY 83 contains some of the largest remaining areas with a high priority for fuel mitigation treatment. The proposed work occurs within the WUI, and addresses the fuel mitigation needs in this area	Refer to reponse to comment #1
11	6-SWCC	General	General Support	The project proposes to treat many areas that were previously industrial forest lands. These areas were heavily harvested in the past and currently are fairly uniform containing young forests. These areas will benefit from pre-commercial thinning to diversify conditions and set forests on desired trajectories for future conditions. The project also recognizes that future climate conditions will be different, and has adjusted planned treatments to produce conditions that will be more resilient under these projected conditions. We also support the efforts to reduce the road footprints, particularly in former industrial forest lands. We think that these are all important components of the project.	Refer to reponse to comment #1

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
16	7-Sun Mountain Lumber	General	General Support	On behalf of Sun Mountain Lumber, Inc., we are writing to express our support for the proposed North Seeley Wildland Urban Interface – Highway 83 Project on the Lolo National Forest. (...) As Montana's largest family-owned sawmill and a long-time purchaser of federal timber, we recognize the critical importance of proactive forest management projects like this for protecting communities, restoring healthy forests, and supporting rural economies. The North Seeley WUI – Highway 83 Project addresses urgent needs across multiple resource areas, and we strongly support its focus on: ·Reducing hazardous fuels adjacent to communities, infrastructure, and key travel corridors like Highway 83, enhancing public safety and aiding in wildfire response efforts. ·Restoring forest resilience by thinning dense, overstocked stands, favoring fire-and disease-resistant species such as western larch, ponderosa pine, and rust-resistant western white pine. ·Supporting local economies by providing a sustainable supply of wood products that maintain mill infrastructure, secure forest-sector jobs, and sustain community stability. ·Protecting critical infrastructure, including utility corridors, campgrounds, recreation sites, and essential egress routes that are vital to public safety and economic activity. ·Enhancing wildlife and aquatic habitats by improving forest conditions and reducing the risk of large-scale, high-intensity wildfires that can degrade these important resources.	Refer to reponse to comment #1
20	8-AFRC	General	General Support	AFRC supports the Project's Purpose and Need because it addresses the most critical needs of the project area	Refer to reponse to comment #1
43	8-AFRC	General	General Support	Further highlighting the need for management in the area is the fact that 100 percent of the project area is located in the Seeley-Swan County Wildfire Protection Plan, which has identified the project area as being within a Wildland Urban Interface (WUI). The WUI includes areas with the highest risk to communities and community assets, concentrated habitation, major infrastructure, and high use recreation areas. This zone primarily extends along the Montana State Highway 83 corridor from south of the Highway 83 and Montana Highway 200 intersection to the Missoula and Lake County line. The Community of Seeley Lake dodged a big bullet in 2017 when the Rice Ridge Fire came within yards of the community. The picture below shows the devastation of that fire. Without the needed thinnings and fuel reductions planned in the WUI, another catastrophic wildfire could again threaten Seeley Lake and the surrounding area.	Refer to reponse to comment #1

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
44	8-AFRC	General	General Support	Additionally, 34 recreation residences and two resorts are adjacent to the project area. Four developed campgrounds are within the project area with over 20,000 visitors annually. Due to the history of fire suppression and exclusion, vegetative conditions have caused disease and mortality in stands in both developed and dispersed recreation areas throughout the project area. AFRC drove into the Lake Alva campground and observed first had the dead and dying trees that could easily fall over causing injury and damage to unsuspecting campers. We strongly support the treatments planned for this and other popular camping and recreation areas.	Refer to reponse to comment #1
51	9-F.H. Stoltze	General	General Support	Active management will also provide jobs to local workers and much-needed fiber to local mills. Both of which are important to continue the management of the Forest for the desired future conditions. Please continue to manage as many acres as possible commercially. with healthy forests come healthy water, wildlife, and recreation. Commercial management will keep the desired trees growing while encouraging regeneration of the future forest. It's one of the most effective tools of reducing fuels across the landscape and within the WUI.	Refer to reponse to comment #1
55	13-DNRC	General	General Support	The primary objective for treatments in WUI should be to reduce the intensity of fire behavior needs to occur to facilitate safer, more effective wildland fire operations. Providing spatially connected fuel reduction treatments to modify fire behavior and increase firefighters' chances of reducing impacts while at the same time improving forest health and promoting local natural resource jobs is something DNRC fully supports and increase options for safely protecting values at risk.	Refer to reponse to comment #1
56	13-DNRC	General	General Support	To meet the Purpose and Need of the National Wildfire Crisis Strategy and Montana Forest Action Plan (MFAP) the number of acres treated needs to be increased. Currently 36% of the 22,997-acre project area project is proposed to be treated. We urge you to look at increasing the number of acres to treat both inside and outside the WUI. Many areas in the Forest are set up for large-scale, severe wildfires that can threaten communities, lead to loss of forests across landscapes, soil productivity, viewsheds, and habitats.	The scope of treatment acres was designed to meet the purpose and need, while considering multiple factors including EAD, fuels accumulations, vegetative restoration, wildlife resources and critical habitats, and public safety in high use areas.
57	13-DNRC	General	General Support	We agree that the Hwy-83 project is expected to increase the pace and scale of cross boundary work.	Refer to reponse to comment #1
209	PM2-Marshall	General	General Support	Thank you for doing this today and thanks for this project.	Refer to reponse to comment #1

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
210	15-Verboven	General	General Support	I agree with the analysis and proposed management regarding forest restoration, it's hard to argue with promoting western larch (and western white pine where they naturally appear). A forestry mainly aimed at mimicking what a natural fire regime would likely have produced is a sound strategy and will help build the resiliency needed in a warming climate and dealing with future forest fires. In case of larch these may be frequent and low in intensity, which is much preferred over what we witnessed in the Rice Ridge Fire!	Refer to reponse to comment #1
65	5-AWR	General	Maps	Disclose maps of the area that show the following elements: 1. Past, current, and reasonably foreseeable logging units in the Project area; 2. Past, current, and reasonably foreseeable grazing allotments in the Project area; 3. Density of human residences within 1.5 miles from the Project unit boundaries; 4. Hiding cover in the Project area according to the Forest Plan definition; 5. Old growth forest in the Project area; 6.Big game security ar-eas; 7. Moose winter range.	1. Appendix D describes past, present, and reasonably foreseeable timber activities in the project area. 2. No grazing allotments occur in the project area. 3. Please refer to the Fire and Fuels Specialist Report, Appendix B- Highway 83: North Seeley WUI Project Alignment with Wildland Urban Interface and the Definitions Used in the Healthy Forest Restoration Act for the Purpose of Applying the NRLMD WUI Exemption. This was added after the comment period to clear up any remaining confusion regarding the WUI and includes structures on the maps**.** 4/6/7. Big game habitat indicators in the project area are described in Section 3.9 of the EA and the associated wildlife specialist report. 5. Old growth conditions are described in Section 3.2 of the EA and the associated vegetation specialist report.
76	5-AWR	General	WUI	Please provide a map showing the Wildland Urban Interface (WUI) and the locations of all homes in comparison to the project area.	A new appendix, "Appendix B - Highway 83: North Seeley WUI Project Alignment with Wildlife Urban Interface and the Definitions Used in the Healthy Forest Restoration Act for the Purpose of Applying the NRLMD WUI Execmption", as been added to the Fire and Fuels Specialist report in the project record which includes maps with structures. This was added after the comment period to clear up any remaining confusion regarding the WUI.
77	5-AWR	General	WUI	Does the WUI comply with the statutory definition of the WUI under the Healthy Forest Restoration Act? Page 3 of the EA has a map of the WUI but it does not demon¬strate that it complies with the definition of the WUI found in the Healthy Forest Recreation Act.	Refer to response to comment #82.
53	10-DEQ	Hydrology	General Support	DEQ continues to support this project and the proposed actions to protect and restore water quality to help meet the goals of the Federal Clean Water Act and Montana Water Quality Act. The overall road density reduction, decrease in long-term sediment loading, removal of stream crossings and implementation of proper best management practices during vegetation management will all reduce environmental impacts and work to restore hydrological functions to the project area, supporting initiatives in the Middle Blackfoot-Nevada Creek TMDL.	Thank you for your review of the project and your comment in support of the proposed action.

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52	10-DEQ	Hydrology	RPMs	Within the project area, DEQ has listed Richmond Creek as water quality impaired from the headwaters to its confluence with Lake Alva. Sediment pollution impairs aquatic life, and the Middle Blackfoot-Nevada Creek Total Maximum Daily Loads1 attributes this to timber harvest activities (pg. 338). Specifically, road crossings and streamside roads contribute sediment to Richmond Creek, elevating fine sediment in riffles to 2-3 times higher than expected reference condition (pg. 143). In 2023 DEQ provided comments to this proposed project as it relates to water quality and had specific recommendations to maximize water quality benefits along Richmond Creek as the impaired waterbody. DEQ recommends reviewing these recommendations to include in your implementation plan, and to include similar activities throughout the project area to protect exiting water quality in the watershed.	Watersheds in the project area are generally in an upward trend of recovery from past disturbances. The selected action generally does not affect this trend, i.e., would result in neutral or upward direction after project completion. At road / stream crossing locations, general decomissioning practices could include utilizing legacy seed sources (e.g. on-site material such as duff). Other sources could include riparian seed sources which would be manually distrubuted within riparian area to assist in establishing riparian plant communities and floodplain stabilization. Excavators used for road decommissioning work could also transplant mature plants from the area. Woody debris could also be added to reclaimed road / stream crossings to add habitat complexity and fine sediment trapping function to the stream channel.
108	5-AWR	Hydrology	Undetermined Roads	Just like for grizzly bears, lynx, and elk, the EA admits that the undetermined (illegal) roads are there but does little to deal with them even though all of the streams in the project area are Func¬tioning at Unacceptable Risk in violation of the Forest Plan, ESA, NFMA, NEPA, and the APA.	The majority of undetermined roads in the project are not illegal roads but rather roads created on private lands that have since been acquired by the USFS. This project will result in the reduction of roads in the long-term. There are 154 miles of road proposed for decommissioning, which will offest the minimal miles of new construction and road improvements needed for haul activities. RHCA buffers and RPMs would be applied to minimize impacts to streams and riparian resources from treatment activities.
152	5-AWR	Process-Planning	Alternative	Please develop an alternative that maximizes the amount of car¬bon the project area absorbs.	The purpose and need (Section 1.4 of the EA) does not support a need to address an alternative for carbon storage. In addition, based on the Forest Level Carbon Assessment, the impacts of Forest management on GHG and Carbon are minimal. Please refer to this document in the project record. A project-level analysis for GHG and Carbon was conducted to provide a quatitative assesment of the project's effects on the Carbon and GHG and demonstrates that the effects of the project are within the range of effects discussed in the Forest Level Carbon Assessment in the project record.
68	5-AWR	Process-Planning		The EA and DN fail to cite all the pertinent, applicable forest-wide and Management Area (MA) standards, and demonstrate that the project would be consistent with them.	The EA and associated specialist reports document adherence to all applicable laws, regulations, and policy.
106	5-AWR	Process-Planning		The North Seeley Lake project is in violation of NEPA for not responding to our comments. The standard is not being met at the project level and their is no evidence provided that it is being met at the Forest Plan level.	Scoping comments were considered during project development. Comments on the EA are being considered at this time, adhering to NEPA.
117	5-AWR	Process-Planning		The project as described in the EA and FONSI is a violation of NFMA, the Clean Water Act, the ESA, the APA, the Forest Plan and the ESA.	Refer to response to comment #68.
12	6-SWCC	Recreation	General Support	Incorporating new recreational opportunities associated with the Seeley Lake trail system is an added benefit and important to the community.	Thank you for your review of the project and your comment in support of the proposed action.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
211	15-Verboven	Recreation	Support	What I am really excited about is the 27 miles of proposed mountainbike singletrack. I'm a biker and the lack of trails in a valley that has great terrain and potential has been a lost opportunity. By locating the trails near the existing highway corridor it'll be easily accessible, and won't add too much to wildlife disturbance (given that Highway 83 does that already). It's my understanding that the future of the mill in Seeley Lake is uncertain and diversifying into the tourist sector makes a lot of sense. I'm a big fan of nonmotorized recreation, whether it's hiking, XC skiing or cycling, and these trails will be a great addition.	Refer to reponse to comment #12.
6	4-Seeley Lake Nordic	Recreation	User Safety & Access	We specifically support the planned fuels reduction work aimed at decreasing the severity of wildfires. The project area consists of densely stocked mature forest, much of which is affected by beetle kill. The proposed treatment will help rejuvenate the forest, making it more resilient to catastrophic wildfire. This is especially important for the Seeley Creek Trails, which are heavily used for both winter and summer recreation. The volume of dead and dying trees continues to grow each year, requiring significant volunteer hours and club funds to keep trails open and safe. The Highway 83 Project will reduce these hazards and improve safety for trail users.	Refer to reponse to comment #12.
7	4-Seeley Lake Nordic	Recreation	User Safety & Access	The proposed beginner trails, accessible directly from the trailhead, would better serve these users and support our free community ski clinics.	Refer to reponse to comment #12.
8	4-Seeley Lake Nordic	Recreation	User Safety & Access	The new proposed connector trails would allow skiers to reach the Skyline Trail-an advanced area-without using groomed snowmobile trails. Reducing the need for mixed motorized and non-motorized use will improve safety and enhance the experience for all recreationists	Refer to reponse to comment #12.
9	4-Seeley Lake Nordic	Recreation	User Safety & Access	SLNSC supports the proposed low-impact mountain bike trails, which would complement the Nordic trail system and expand year-round recreational opportunities in the area.	Refer to reponse to comment #12.
46	8-AFRC	Transportation	Aquatics	Finally, we are including links to three studies produced by Brian Sugden relating to road maintenance and sedimentation, BMPs in Montana, and streamside management and impacts to water temperature. We think these studies can help inform the analysis related to aquatic resources. https://www.tandfonline.com/doi/abs/10.1080/14942119.2019.1571472?scroll=top&needAccess=true&journalCode=tife20 https://academic.oup.com/jof/article/110/6/328/4599544 https://www.tandfonline.com/doi/full/10.1080/14942119.2019.1571472?scroll=top&needAccess=true&	The links/citations provided lead to abstracts, but full literature was not provided. Refer to the response to literature in the project record for consideration. From the abstracts, it seems both articles discuss various best management practices and riparian habitat conservation areas as effective measures to reduce impacts on streams. Relevant, and similar science is cited in the EA and associated specialist reports. Here are the full citations: Sugden, Brian, Ron Steiner, & Jay E. Jones. 2019. "Streamside management zone effectiveness for water temperature control in Western Montana." International Journal of Forest Engineering. Volume 30, 2019- Issue 2. Sugden, Biran, Rober Ethridge, George Mathieus, Patrick E.W. Heffernan, Gary Frank, & Gordy Sanders. 2012. "Montana's Forestry Best Management Practices Program: 20 Years of Continuous Improvement." Journal of Forestry. Volume 110, Issue 6.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
208	PM1-Rathman	Transportation	Decommission	On decommissioned roads, please increase the width of footpath left from 12" as stated on page 124 to 18" at least. Makes it easier to walk. Possible to get a PDF of transportation map better than what was included in the EA doc.	Resource protection measure REC-3 "Retain an approximate 12-inch-wide flat surface on decommisioned roads for non-motorized access where practical" will be updated to "12- to 18-inch wide". A larger PDF version of the project maps will be made available online on the project website: https://www.fs.usda.gov/r01/lolo/projects/64580
45	8-AFRC	Transportation	Decommission	While we understand the need to manage your road system and protect resources at risk, especially when you have to consider ESA-listed species, we ask you to consider that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This is especially true when considering the decommission of roads. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner. If the Forest proposes to decommission, abandon, or obliterate road segments from the North Seeley Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited. We would like the Forest to carefully consider the following three factors when deciding to decommission any road in the project area: ·Determination of any potential resource risk related to a road segment. ·Determination of the access value provided by a road segment. ·Determination of whether the resource risk outweighs the access value (for timber management and other resource needs). We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.	The USFS conducted a project-level Travel Analysis Process (TAP) to determine which roads are needed for access (e.g., for land management activities, recreation, and ingress/egress to private land, support fire suppression activities) and to identify resource concerns. The TAP was used to develop the proposed action.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
164	12-Berglund	Transportation	Proposed Road	We have owned/leased a recreational residence on the Seeley Ranger District off of Road 17689 since 2002. We are concerned with the proposed addition of a new road to the National Forest Road Systm that connects to Road 17689 to the north. This is a safety concern to us as we have experienced indiscriminate firearm discharge and illegal woodcutting adjacent to our cabin, and permanent maintenance of the new road would encourage more of this activity. Also, this new road would lead nowhere, terminating after approximately 1/4 mile. We request and recommend that the new proposed road not be permanent, not be added to the National Forest Road System, and that it be obliterated and restored following Project use.	This is an existing road proposed to be added to the NFSR. This road will be closed to public motorized use year long. The end of this road, the portion turning east, is proposed for decommissioning.
131	5-AWR	Transportation	Road density	In simpler terms, the Forest Service has found that there is no way to build an environmentally benign road and that roads and logging have caused greater damage to forest ecosystems than has the suppression of wildfire alone. These findings indicate that roadless areas in general will take adequate care of them¬selves if left alone and unmanaged, and that concerted reduc¬tions in road densities in already roaded areas are absolutely necessary.	The USFS conducted a project-level Travel Analysis Process (TAP) to determine which roads are needed for access (e.g., for land management activities, recreation, and ingress/egress to private land, support fire suppression activities) and to identify resource concerns. The TAP was used to develop the proposed action. This project will result in the reduction of roads in the long-term. There are 154 miles of road proposed for decommissioning, which will offest the minimal miles of new construction and road improvements needed for haul activities.
155	5-AWR	Vegetation	climate change	The EA provided a pittance of information on climate change ef¬fects on project area vegetation. The EA provides no analysis as to the veracity of the project's Purpose and Need, the project's objectives, goals, or desired conditions. The FS has the respon¬sibility to inform the public that climate change is and will be bringing forest change. For the North Seeley Lake project, this did not happen, in violation of NEPA. The EA fails to consider that the effects of climate change on the project area, including that the "desired" vegetation conditions will likely not be achievable or sustainable. The EA fails to pro¬vide any credible analysis as to how realistic and achievable its desired conditions are in the context of a rapidly changing cli¬mate, along an unpredictable but changing trajectory.	Appendix 4 Scientific Basis for Restoration and Appendix 7 Regeneration Assurance Assessment of the forested vegetation report address the impacts of climate change on desired vegetation conditions.
14	6-SWCC	Vegetation	Existing Conditions	The project places significant emphasis on addressing insect and disease outbreaks, particularly beetle impacts to large Douglas fir trees. It blames this outbreak on the lasting effects of the Rice Ridge Fire in 2017 that it says weakened the health of trees, and allowed for an outbreak of beetles. While some effects of beetles are evident, the concern over future impacts and the heavy targeting of large Douglas fir trees is overblown. Relatively few acres in the project area were actually burned in the Rice Ridge Fire (some statistics on the number of burned acres would be useful). So relatively few trees in the area were actually impacted and weakened by the fire.	Douglas-fir beetles are attracted to trees weakened by fire and then expand into surrounding forests. The Rice Ridge Fire exacerbated beetle conditions within and surrounding the fire. Please see the Vegetation Report, Appendix 4-Scientific Basis for Restoration, for more detailed information.
22	8-AFRC	Vegetation	General Support	AFRC believes the treatments planned in the area are appropriate for the landscape and forest health issues present. There are 10,997 acres identified as MA 16 in the Project which is designated for timber management, and the District is treating a good portion of those acres.	Thank you for your review of the project and your comment in support of the proposed action.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
37	8-AFRC	Vegetation	Harvest Methods/ Analysis	We would like the District to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Lolo National Forest market area with a variety of skills and equipment. Developing an EA contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soil should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area may be planned for cable harvest, there may be opportunities to use certain ground equipment.	Soils resource protection measures tier specifically to soil policy requirements, or results from past soil monitoring. These resource protection measures display and communicate how the Forest Service will comply with relevant policy during project implementation. For example, slope limitations on ground-based equipment tie directly to the Lolo Forest Plan (USDA FS 1986), which states, “when necessary to deviate [from tractor yarding under 35 percent slope], specialist is required with documentation in the project Environmental Assessment.” Soil moisture requirements are the result of past project monitoring (Carlson 2010;2011a;b;2012, Carlson and Hadlow 2014, Hadlow 2016, Campbell et al. 2019), and display compliance with the R1 Soil Quality Standards (FSM 2500 – R-1 Supplement R1 2500-99-1 (1999)) and National Forest Management Act ((16 U.S.C. 1604) (1976). Soil resource protection measures provide opportunities to work with the forest soil scientist or timber sale administrator to review specific or non-standard “on the ground” situations or respond to changes in technology. For example, tethered logging, which is considered a new technology associated with implementation, is considered for slopes over 35 but less than 70 percent).
72	5-AWR	Vegetation	Old Growth	the Lolo N.F. Forest Plan standard is not Green et a. (2011), the Lolo Forest Plan standard for old growth is: Stands should be provided which are at least 30 to 40 acres in size and are decadent, multistoried, fully stocked, contain snags with dead and down material greater than 15 tons per acre, and contain 15 trees per acre greater than 20 inches d.b.h. These stands should be well distributed. (...)	Green et al. 2011 is used across the forest as the best available science for assessing old growth characteristics. However, old growth assessments in Management Area 21 specifically followed Forest Plan Standard 4 as required by the Forest Plan. Refer to the Vegetation Specialist Report and associated appendices for additional details added after the comment period for clarification.
73	5-AWR	Vegetation	Old Growth	The EA does not demonstrate that it is following the Lolo N.F. Forest Plan standard for old growth which is not based on Green et al., it is based on the Forest Plan standard than the Forest Ser-vice’s interpretation of Green et al.	Refer to response to comment #72.
179	14-NEC	Vegetation	Old growth	The agency is using the definition of Green et al. (1991) for old growth, which as per minimum criteria supports logging and salvage harvest within these stands. This is not Forest Plan direction, as the Forest Plan requires 15 trees per acre over 20 inches dbh, almost double the Green et al. (1991) definition. This ongoing Forest Plan violation has never been evaluated as per impacts to snag/old growth wildlife, so cumulative impacts across the Forest are unknown.	Refer to response to comment #72.
74	5-AWR	Vegetation	Old Growth	The EA does not state how many acres is size the old growth stands in the project area will be after the project is over. The EA does not show that old growth stands will continue to be decadent, multistoried, fully stocked, contain snags with dead and down material greater than 15 tons per acre, and contain 15 trees per acre greater than 20 inches d.b.h.	Appendix 5 Old Growth Summary and Appendix 8 Forest Plan Consistency for MA21 provide further details regarding existing and post-project conditions for old growth and old growth potential areas. Treatments in old growth stands are designed to retain old growth characteristics. Refer to the Vegetation Specialist Report and associated appendices for additional details added after the comment period for clarification.

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170	14-NEC	Vegetation	Old growth	The acres of old growth present is unknown. These acres are not mapped in the Project Area. The types of old growth present are not identified. It is unknown if the existing old growth meets Forest Plan requirements for patch size (40 acres). It is unknown if the project area is consistent with the 8% old growth requirement for 79% of the drainages across the forest. The current levels of old growth in the project area would be an essential indicator of population trends for associated species, such as is the historical levels of 20-50% of old growth being met (Lesica 1996).	Acres of old growth are provided in the EA Section 3.2 as well as the Vegetation Report, Appendix 5 Old growth summary.Green et al. 2011 is used across the forest as the best available science for assessing old growth characteristics. However, old growth assessments in Management Area 21 specifically followed Forest Plan Standard 4 as required by the Forest Plan. Refer to the Vegetation Specialist Report and associated appendices for additional details added after the comment period for clarification. Species associated with old growth were assessed using various species-specific habitat models which take into account more than just old growth definitions. Please refer to the wildlife report, associated habitat model descriptions in the project record, and the biological assessments for further details.
75	5-AWR	Vegetation	Old Growth	Please see the attached Report on Old Growth by Jeff Juel.	Refer to the literature review in the project record for consideration.
59	5-AWR	Vegetation	Old growth	Disclose the current level of old growth forest in each third order drainage in the Project area.	There is no requirement in the Lolo Forest Plan to evaluate old growth forest in each third order drainage. For existing conditions of old growth forest within the project area, refer to the Vegetation Specialist Report and associated appendices.
60	5-AWR	Vegetation	Old growth	Disclose the method used to quantify old growth forest acreages and its rate of er¬ror based upon field review of its predictions.	A region-wide old growth analysis using Forest Inventory and Analysis (FIA) data was used to predict the amount of old growth throughout the Lolo National Forest prior to the 2017-2021 wildfires. For this project, common stand exams in 2020 and 2021 focused on the most potential old growth stands with the project area to assess the old growth status of proposed treatment areas. Data from stand exams was processed by FS Veg. Since then, stands with suspected old-growth characteristics have had walkthrough surveys completed and no existing or potential old growth has been documented from those efforts. Two different common Stand Exam, field survey efforts were performed within the areas where stands were identified that may meet Green et al status or were within acres that fell within Lolo Forest Plan MA 21. Field stand exam data were processed in the old growth analysis tool in the Forest Service FS Veg data bases utilizing old growth criteria and current stand conditions and attributes. All associated stand-level statistics associated with survey errors according to various criteria can be found in the FS Veg Old Growth reports part of the North Seeley WUI – Highway 83 project file.
61	5-AWR	Vegetation	Old growth	Disclose the historic levels of mature and old growth forest in the Project area	Refer to the Vegetation Specialist Report and associated appendices for additional details added after the comment period for clarification.
63	5-AWR	Vegetation	Old growth	Disclose the amount of mature and old growth forest that will remain after implementation.	Refer to response to comment #61.
69	5-AWR	Vegetation	Old Growth	The EA and DN do not demonstrate that management is consistent with Forest Plan requirements for old growth.	Refer to response to comment #61.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
180	14-NEC	Vegetation	Old growth	It appears that the Lolo National Forest must amend the Forest Plan as per old growth management before the North Seeley Project can proceed, since it does not appear Forest Plan direction is being adhered to. It is also clear that the agency needs to amend the Forest Plan for maintaining a diversity of wildlife dependent upon snags so that the current best science is used to ensure persistence of these many bird species. To proceed without such an amendment means that the agency is knowingly violating the NFMA requirements.	Refer to response to comment #72.
42	8-AFRC	Vegetation	Prescription	AFRC strongly supports the removal of hazard trees throughout the Project area. The District makes a strong argument for this: “Removing hazardous trees as part of a larger vegetation management prescription would have direct and indirect effects on sites around developed campgrounds, recreation residences, resorts, trails, and power line corridors. A direct beneficial effect of treating areas is providing greater safety by removing danger trees and increasing forest health through cutting, burning, and replanting thus making the areas more fire resilient. An indirect effect may be that area managers are better able to annually mitigate the number of hazardous trees within recreation sites as this number would be reduced.” Areas where hazard trees will be removed include established campgrounds, picnic areas, and other recreation areas. Campgrounds with established sites include Lake Alva Campground, Rainy Lake Campground, Big Larch Campground. Seeley Creek Ski Area contains approximately 19 miles of existing Nordic ski trails. Also the Project area contains the following campgrounds with established sites: Lake Inez Campground, Lakeside Campground, River Point Campground, and Seeley Lake Campground. AFRC and our members have visited the Lake Alva campground and viewed the many dead and dying spruce trees along with other species that are failing. We understand that one tree in that campground fell over on a camp trailer, but fortunately no one was injured.	Refer to response to comment #22.
24	8-AFRC	Vegetation	Prescription	AFRC further agrees that regeneration is needed in some of the stands as pictured above where dead and dying Douglas-fir cover the landscape along with areas where root rot is prevalent. Healthy stands of western larch, white pine, and ponderosa pine are more likely to flourish following the removal of the current overstory.	Refer to response to comment #22.
26	8-AFRC	Vegetation	Prescription	AFRC supports the District’s plan to create openings greater than 40 acres. (….) Further, AFRC supports the District on their 60-day public review period to gain Regional Forester approval for the creation of these openings.	Refer to response to comment #22.
49	9-F.H. Stoltze	Vegetation	Prescription	Openings larger than 40 acres support increased regeneration of early seral species such as western larch and ponderosa pine. These species are more resilient to wildfire and promoting them will trend the Forest back to historic species composition.	Refer to response to comment #22.
50	9-F.H. Stoltze	Vegetation	Prescription	We also support treatment within riparian zones. Improving the health and reducing the fuel loads in theses areas will help maintain stream cover in the long term.	Refer to response to comment #22.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
41	8-AFRC	Vegetation	Prescription	AFRC supports the District implementing 539 acres of shaded fuel breaks. Shaded fuel breaks would be created in defensible areas along Highway 83 to reduce fuels by decreasing stand density and increasing height to base tree crown ratios. An area such as the Highway 83 corridor is a feature favorable for defense and can effectively aid in fire suppression activities. This defensible area would also provide public and administrative ingress/egress in the event of a wildfire or emergency within the Seeley-Swan WUI. Where possible, mechanized equipment would be used to cut and remove mid and subcanopy trees. AFRC suggests these shaded fuel breaks be at least 400 feet wide (200 ft. on each side of the highway and thinned down to 40 sq. ft. of basal area. This would reduce fuel loading and improve the vigor of the remaining trees.	Refer to response to comment #22.
15	6-SWCC	Vegetation	Prescription	And, while some beetle mortality is evident, wholesale thinning of large Douglas fir trees in stands is unwarranted. Calling for heavy removal of Douglas fir larger than 13 inches is not warranted. We certainly support the thinning of overly dense stands of Douglas fir, and emphasizing leaving ponderosa pine and larch is appropriate, especially given the consideration of climate change effects. However, targeting the removal of a majority of large Douglas fir trees that are not currently showing signs of beetle effects should not be a desired condition. While some large trees may die, many others will survive. In particular, very large Douglas fir trees (trees >20" D.B.H.) should be left. These trees, as the SWCC commented on during scoping, are in a practical sense, irreplaceable in meaningful timeframes, and represent an important structural component of the forest whether alive or dead. They should remain. The only exceptions should be in high-use recreational areas or directly adjacent to roads where dead and dying trees present a safety hazard. These protective specifications should be added to the planned actions.	Thinning large Douglas fir trees is shown to decrease stand susceptibility to beetle outbreaks. Please see the Vegetation Report, Appendix 4-Scientific Basis for Restoration, for more detailed information.
23	8-AFRC	Vegetation	Prescription	AFRC would like the District to consider thinning some stands identified for Intermediate Harvest to a basal area of 40 sq. ft. per acre. This will enhance the vigor of the residual trees and reduce fire risk in the project area substantially.	Retention of the Intermediate Harvest units would have ranges of basal area retained based on existing stand conditions, species compositions and Forest Plan direction. As forest health and fuels reduction project objectives take precedent, stand densities will be reduced accordingly to meet those objectives.
25	8-AFRC	Vegetation	Prescription	The Forest has recently acquired land that has been heavily cut over in the past but currently has healthy stands of reproduction growing on them. During our field visits, we noted that some of these stands are ready for commercial thinnings, and we encourage the Forest to treat ALL of these stands that are commercially ready by reducing the stocking levels down to 40 sq.ft. of basal area. This would be the same treatment we recommend for young forest mechanized thinning as well.	The Forest would maximize commercial treatments where feasible across the project area, including acquired lands.
38	8-AFRC	Vegetation	Recreation conflicts	Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only make surviving in the logging business much more difficult.	The FS will consider all uses when determining operational days.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
27	8-AFRC	Vegetation	RHCA	AFRC would also like the Forest to consider management in the riparian areas beyond what is proposed. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long term creation of large down woody debris and large in-stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives.	For this project, the FS will be adhereing to standard INFISH RHCA boundaries along all streams and wetlands. Modifications can be approved by Fisheries Biologist or Hydrologist for treatments within RHCAs on a site-specific basis pending review of INFISH riparian management objectives and additional mitigation measures (e.g., allow felled trees to remain on the ground within RHCAs). No specific riparian treatments will occur.
28	8-AFRC	Vegetation	RHCA	The tradeoffs the Forest Service will likely consider through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves. Stream temperature **Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. Forest Ecology and Management, 270, 302-313**. Key points of the Janisch paper include: ·The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature. ·Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.	This full reference document cited here was not provided with the comment letter for a complete review.
29	8-AFRC	Vegetation	RHCA	**Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. Forest Science, 53(2):254-269**. Key points of the Anderson paper include: ·With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands	This full reference document cited here was not provided with the comment letter for a complete review.

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30	8-AFRC	Vegetation	RHCA	Riparian reserve gaps **Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old growth versus earlymature riparian forests in western Oregon. Aquatic Sciences 75:547558.** Key points of the Warren paper include: ·Canopy gaps were particularly important in creating variable light within and between reaches. ·Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests	This full reference document cited here was not provided with the comment letter for a complete review.
31	8-AFRC	Vegetation	RHCA	Wood Recruitment **Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. Forest Ecology and Management. 372 (2016) 247-257.** Key points of the Burton paper include: ·Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units. ·82% of sourced wood in early stages of decay originated from within 15 meters of streams.	This full reference document cited here was not provided with the comment letter for a complete review.
32	8-AFRC	Vegetation	RHCA	Sedimentation **Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. Journal of the American Water Resources Association. Paper No. 01162** Key points of the Rashin paper include: ·Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.	This full reference document cited here was not provided with the comment letter for a complete review.
33	8-AFRC	Vegetation	RHCA	Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.	Refer to respnse to comment #27.
212	16-Johnson	Vegetation	Species diversity	As I look at the tree selection and harvesting along the Boy Scout Rd, I would like to see more species diversity in the Highway 83 project.	Compared to the previous Westside Bypass project, there will be more species diversity because there is more Ponderosa Pine and mid-level fir under 13 inches in the understory on that side of the valley. We have more to work with.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
36	8-AFRC	Vegetation	Tethered Logging	The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. We urge the Forest to consider allowing this equipment to be used where appropriate on the North Seeley Project to mitigate implementation obstacles. **Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvesterforwarder thinning in western Oregon. For. Sci. 66(1):82–96** Key Points of the Green paper include: ·The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.	As discussed in the Standard Operating Procedures (Appendix B), tethered machinery is considered operable on slopes up to 70 percent.
13	6-SWCC	Vegetation	Western white pine	The project area is not western white pine habitat, and equating forest habitat types that support western white pine to the project area is incorrect, and weakens the overall report.	Western white pine habitat and populations do occur within the project area, more frequently toward north end of Lake Alva.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
182	14-NEC	Wildlife	Clearcuts	The impact of the proposed clearcutting, including very large openings, in the North Seeley project were never evaluated. The agency has thus not take a "hard look" at the decision to implement a large portion of this project to clearcutting, including very large clearcuts. In effect, it appears that this project was designed without any consideration to the effects on wildlife or the local climate. For example, clearcuts over 4 acres in size are identified as non-foraging habitat for the Northern Goshawk, an old growth MIS for the Lolo National Forest. In addition, recommendations for management of the Pileated Woodpecker, another MIS for the Lolo National Forest, include no clearcuts (Bull and Holthausen 1993). Monitoring of Pileated Woodpecker populations has demonstrated a drastic reduction in occupied habitats due to clearcutting (Bull et al. 2007). Similar effects have been noted for clearcutting in occupied Northern Goshawk habitat. Clough (2000) reported that goshawk reproduction declined as the amount of clearcutting in the home range increased. And the North Seeley wildlife report notes that it takes 100-120 years for snags to redevelop within clearcuts, which means that clearcuts eliminate nesting habitat for over 20 or more bird birds for at least 100 years. The wildlife report also notes that snags left in clearcuts will only stand for 10-20 years, which means after this period, snags will generally be gone. The retention of some green trees is no guarantee that they will become snags, or even if so, that these snags will be suitable for cavities, given that as few as 4% of snags may meet this requirement (Vizcarra 2017). The Lolo Forest Plan identifies the following cavity-nesting birds as primary excavators on this forest; Pileated Woodpecker, Hairy Woodpecker, Northern Flicker, Downy Woodpecker, Williamson's Sapsucker, Black-backed Woodpecker, and Three-toed Woodpecker. The Forest Plan does not define how snag habitat can be maintained over a 100-year rotation cycle for these species as a result of clearcutting. There has also been no monitoring of Hairy Woodpecker populations, the snag MIS, within clearcuts, new and old. The agency has not demonstrated that leaving a few snags in clearcuts will maintain the Hairy Woodpecker. The agency has not demonstrated that if Hairy Woodpeckers abandon clearcuts due to a lack of habitat, how many years are required before clearcuts are again occupied by Hairy Woodpeckers. In summary, the agency has no idea how clearcuts impact snag-associated wildlife, including within the North Seeley project area.	Please refer to the Wildlife specialist report in the project record for analysis regarding these species. These listed species are associated with old growth and other habitats. Regeneration harvests are not clearcuts, but would result in large openings. Regeneration is not proposed in existing old growth stands. Snag management is guided by 1) the Lolo National Forest Dead and Down Habitat Components Guidelines (June 1997), 2) Northern Region Snag Management Protocol (2000), 3) the Lolo National Forest 2006 Down Woody Material Guide (Stewart et al. 2006), and 4) the LNF Forest Plan Appendix N." Science is cited throughout these guiding documents and provides the Forest with recommendations on snag retention. Regeneration harvest is only proposed to occur on approximately 177 acres of existing modeled pileated woodpecker habitat. Details of goshawk habitat analysis, including regeneration treatments, is included in report. Hairy woodpecker is not a management indicator species on the Lolo NF.
181	14-NEC	Wildlife	Clearcuts	The agency is violating the NEPA and the NFMA by failing to evaluate the impacts of clearcutting for the North Seeley Project; there is no analysis at the Forest Plan level to tier this project analysis to, since the Forest Plan FEIS did not evaluate wildlife impacts from clearcutting.	The EA (Section 3.8 and 3.9) is a summary of the analyses conducted for wildlife. The wildlife report and biological assessments in the project record discuss the direct, indirect, and cumulative effects of the proposed activities on wildlife species and their habitat.
183	14-NEC	Wildlife	elk	The North Seeley project analysis did not define if planned clearcuts will fragment old growth stands, which are to be at least 40 acres in size. The North Seeley project also did not define how the Coordinating elk and timber management: final report of the Montana cooperative elk logging study 1970-19085 (Lyon et al. 1985) was applied to clearcut sizes. This report is required to be included in project analyses for elk as per the Lobo Forest Plan and Record of Decision. It is clear there was a Forest Plan violation for this project because no mention is made as to how the limit of clearcuts to generally 100 acres of less was being met as is required by the Lyons et al. (1985) report. The important factor in regards to clearcut size is the distance to cover; smaller narrow clearcuts can providing hiding cover on edges within 600 feet, as is preferred by elk.	There are no planned clearcuts associated with this project. Regeneration harvest is proposed. However, no regeneration harvests are porposed in existing old growth. Some regeneration harvest is planned in potential old growth stands, but these stands have been impacted heavily from beetle infestation. Refer to the Vegetation specialist report and appendices for further details on regeneration harvest and old growth. Lyon et al. 1985 was referenced in the biological information section under habitat effectiveness and vulnerability of the elk analysis in the Wildlife BE. The analysis considers recommendations and potential impacts according to Lyon et al. 1985 and other research findings and recommendations using more recent and relevant technology and data.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
192	14-NEC	Wildlife	Elk	The agency is also violating the NEPA regarding the elk analysis by claiming that this project will benefit elk by creating more summer forage, which they claim is currently limited. There is no discussion as to why current forage may be limited, due to the massive displacement of elk due to the massive amount of motorized activity in this landscape. As well, opening the forests will not increase late summer forage, as is claimed by the agency. First, elk will not have access to much of this forage in openings and thinned forests because of displacement effects of roads. Keeping openings small so that elk can access forage within 600 feet of cover is also being violated by the North Seeley project, due to the large openings being planned; there is no analysis as to how much actual area of clearcuts will be available as elk forage by being within 600 feet of cover. Also, as is noted by the USDA/MFWP 2013 collaborative recommendations, forage in openings will cure out earlier in the summer season due to increased evaporation and increased heat in openings. As we noted previously temperatures in openings may be up to 18 degrees Fahrenheit in openings than surrounding forests (Knoss 2016). The proposed project will reduce, not increase, palatable late season forage for elk, while more shaded areas which will retain more palatable forage late summer may not be available to elk due to motorized activity.	The Summer Range section under Affected Environment in the Elk/Big game analysis of theWildlife BE discloses the current condition of forage in the project area and how openings in the canopy could increase forage essential for calving cows in early summer.
104	5-AWR	Wildlife	Elk	Christensen et al 1993 finds: Areas where habitat effectiveness is retained at lower than 50 percent must be recognized as making only minor contributions to elk management goals. If habitat effectiveness is notimportant, don't fake it. Just admit up front that elk are not a consideration. You fail to make this admission. You are also violating your Forest Plan requirements. You are violating Forest Plan ORD limitations.	The analysis for Elk/big game consider only the project area in its analysis, not the entire forest. The open road densities mentioned in the forest plan are guidelines applied to the entire forest and not a single specific project area. The analysis explains that while road densities are higher in the project area than recommended, road density within the project area will decrease due to the decommisioning of many roads therefore contributing to a decrease to the overall forest open road densisites. Habitat effectiveness in Christensen et al. 1993 only considers road densities as a measure of habitat effectiveness. Our analysis in the Wildlife BE considers the most recent research, data and technology when evaluating habitat effectivness and therefore considerations of both road densities and forage were taken into account when looking at project impacts on habitat effectivenss.
98	5-AWR	Wildlife	Elk	The Eastside Assessment, the guiding document for elk man-agement on the HLC, was not even cited in the Wildlife Report. So these recommendations were obviously not used in the de-velopment of this project. Also, it is not clear specifically how elk security, or habitat effectiveness, is being measured for this project. Does it require cover?	The Eastside Assessment is used on the Helena-Lewis and Clark National Forest, not the Lolo National Forest. Please see Indicators and Measures Used for Analysis section under the Elk/Big game section of the Wildlife BE for definitions of how security and habitat effectiveness were considered and measured in this analysis, according to Lolo National Forest requirements. Please also refer to the section above on Habitat Effectiveness and Vulnerability for further explanations of elk security and cover considered in this analysis.

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193	14-NEC	Wildlife	Elk	The Lolo Forest Plan requires the agency to consider the 1985 elk logging study by Lyon et al. (1985) in management of elk habitat. There is no mention of this study in the North Seeley Project. One factor being violated by this report is the extensive forest thinning that will occur adjacent to clearcuts. The agency claims that thinned forests will still provide hiding cover, which they define as a tree canopy cover of at least 40%. This is not the Lolo Forest Plan definition, which requires cover to conceal 90% of an elk within 200 feet. This cannot occur when cover is being measured by the canopy, since elk do not occupy the tree canopy. The extensive thinning planned adjacent to clearcuts will clearly violate the recommendations of the 1985 elk logging study by removing hiding cover adjacent to an area where hiding cover has also been removed, which means that forage further from cover will not be available to elk.	Lyon et al. 1985 was referenced in the elk analysis in the Wildlife BE. The analysis considers recommendations and potential impacts according to Lyon et al. 1985 and other research findings and recommendations using more recent and relevant technology and data.
103	5-AWR	Wildlife	Elk	Christensen et al (1993) states: “Any motorized vehicle use on roads will reduce habitat effectiveness. Recognize and deal with all forms of motorized vehicles and all uses, including adminis¬trative use.” Please disclose this to the public and stop represent¬ing that roads closed to thepublic should not be included in habi¬tat effectiveness calculations. The facts that (a) you are con¬structing or reconstructing over 40 miles of road for this project, (b) you have problems with recurring illegal use, and (c) youal-ready admit that you found another 25 miles of illegal roads in the project area that you have not committed to obliterating, means that your conclusion that this Project will have no effect on open road density or habitat effectiveness is implausible to the point of being disingenuous. You cannot exclude these roads simply because you say they are closed to the public. Every road receiving motorized use must be included in the HE calculation. You must consider all of this road use in order to take a hard look that is fully and fairly informed regarding habitat effective¬ness. In the very least you must add in all “non-system” roads, i.e. illegal roads, as well as recurring illegal road use (violations) in your ORD calculations.	The elk analysis in the Wildlife BE includes analysis regarding the proposed action for undetermined roads as well as administrative and temporary on roads closed to the public. The "25 miles of illegal roads in the project area that you have not committed to obliterating" seems to refer to a different project than the North Seeley WUI-Highway 83 project and is not relevant.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
191	14-NEC	Wildlife	Elk	The agency's analysis of project impacts to elk are a violation of the NEPA, the NFMA and the APA. It is impossible to determine what the current active motorized route density is within the North Seeley Project Area. The wildlife report claims the "open" road density in the project area is 2.3 miles per section, or slightly below the minimum recommended level of 2 miles per section for elk management. But as just one example, the wildlife report at 37 states the open road density is 3.9 miles per section. There are 383 miles of roads in the project area, which comes to 10.6 miles of total roads per section. This includes 128 miles of Forest Service roads, 240 miles of undetermined roads, and 15 miles of county roads. The agency intends to add 96 miles of undetermined roads to the agency systems road management, along with 9 miles of additional new roads. There will be 194 miles of these undetermined roads decommissioned over the next 20 years. The status of these 240 miles of undetermined roads during the next 20 years is unclear, but certainly many of them will continue to have motorized activity. As per the USDA/MFWP 2013 collaborative recommendations for management of elk, any road with more than 2-4 vehicle trips within 12 hours disturbs elk. This is consistent with the Christensen et al. (1993) report that any motorized activity displaces elk. So the actual impact of the North Seeley project on elk summer habitat use, or habitat effectiveness, either currently or during project implementation is impossible to know, because the agency is claiming that the only motorized traffic that displaces elk is by public vehicles; logging and administrative traffic supposedly does not displace elk. It is clear that elk displacement for the North Seeley project will be massive, an d will add to what is clearly a huge adverse impact at present due to the high motorized route activity occurring in this landscape. This appears to be a potential motorized activity level of 10 miles per section, as it is not clear how many of the undetermined roads are closed to traffic. The active motorized route level could be 5 times the level that elk can tolerate, which may explain the low elk population levels in this landscape, which are below MFWP objectives. This is noteworthy, as in many areas of Montana, elk are exceeding population objectives. In summary, the agency is violating the NEPA by failing to accurately define what the summer active motorized route density will be for elk during the 20 year project. In effect, the agency is using a large complex project as a means of escaping the NEPA, because it would be far too	The elk analysis in the Wildlife BE includes analysis regarding the proposed action for undetermined roads as well as administrative and temporary on roads closed to the public. Administrative and project related uses are considered temporary as those roads are closed to the public otherwise. The forest wide standard 52 indicates a 1.1 mile per section restriction for elk security. This standard applies to the entire forest and our analysis indicates a higher density of open raods per mile because our analysis is constricted to the project area and does not include other areas of the forest that would reduce this metric. The analysis for Elk/big game consider only the project area in its analysis, not the entire forest. The open road densities mentioned in the forest plan are guidelines applied to the entire forest and not a single specific project area. The analysis explains that while road densities are higher in the project area than recommended, road density within the project area will decrease due to the decommisioning of many roads therefore contributing to a decrease to the overall forest open road densisites.
135	5-AWR	Wildlife	Elk	An open road density (ORD) of one mile per square mile of land reduces elk habitat effectiveness to only 60% of potential. When ORD increases to six miles per square mile, habitat ef¬fectiveness for elk decreases to less than 20%. (Lyon 1984).	Decreasing road densities are described in the EA (Section 3.6.2) and Wildlife report (page 34-42). Open road densities were considered in the elk analysis.
95	5-AWR	Wildlife	Elk	Moreover, in light of the fact that you are exempting this project from ForestPlan hiding cover standards designed to protect and conserve elk habitat, the only protection left for elk habitat would be the Forest Plan open road density limits and mandates to maintain existing HE. This makes your failure to analyze road closure violations even more egregious – both in the Project analysis and your analysis of the Forest Plan amendment. Chronic, illegal road use is reasonably foreseeable and must be addressed in the cumulative effects analysis for both the Project and the Forest Plan amendment.	Forest hiding cover standards are explicitly stated for Winter range habitat but are not explicitly indicated for summer range habitat. This standard is applicable in areas where Elk will receive pressure by hunters in addition to natural predation which would only apply to the fall as Elk and other big game species are passing through the area to settle into their winter range habitats. The analysis explains that the forest plan simply does not apply this standard to Summer range habitat for Elk therefore it is not considered as a significant part of the analysis for this project, even though it is still analyzed. A discussion of illegal road use and how that was considered in the analysis is included in the terrestrial wildlife biological assessment and supporting documentation in the project record.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
102	5-AWR	Wildlife	Elk	Certainly, you are not taking a hard look at habitat effectiveness in this Project area if you are not counting the 230 miles of un-determined roads.	The elk analysis in the Wildlife BE includes analysis regarding the proposed action for undetermined roads as well as administrative and temporary on roads closed to the public.
96	5-AWR	Wildlife	Elk	Additionally, your emphasis on elk populations across entire hunting districts is disingenuous and has little relevance to whether you are meeting your Forest Plan obligations to main¬tain sufficient elk habitat on National Forest lands. What percentage of elk are currently taken on National Forest lands? Have you asked Montana FWP for this information? Any honest biologist would admit that high elk population numbers do not indicate that you are appropriately managing National Forest elk habitat; to the contrary, high elk numbers indicate that you are so poorly managing elk habitat on National Forest lands that elk are being displaced to private lands where hunting is limited or prohibited.	Thank you for your concern, hunting districts are considered in this analysis for several reasons. The forest is obligated to comply with both state and federal regulations which means that the analysis for elk needed to encompass both forest plan standards and MTFWP standards and regulations for hunting districts that fall within the project area. Hunting districts are also a valuable resource of data and information when analyzing elk usage which is another reason they were considered in this analysis. In compliance with Standard 27 of the forest plan, hunting districts and their assocated data produced by MTFWP were used in analysis. The analysis does not consider hunting districts and their data alone, but uses this information as a resource to ensure compliance with both state and federal regulations and the forest plan habitat requirements. Because elk populations are managed by MTFWP and not the National Forest, population numbers and hunting take are not relevant to this analysis and were not used as indicators of measure. The National Forest is only obligated to provided adequate habitat and recreation opportunites while MTFWP manages hunting and populations levels.
39	8-AFRC	Wildlife	ESA	AFRC believes the BA adequately outlines the impacts on threatened species. We especially appreciate the assessment of impacts on Grizzly bear and Canada lynx.	Thank you for your review of the project and your comment in support of the proposed action.
188	14-NEC	Wildlife	Flamm Owl	There are only an estimated 849 acres of Flammulated Owl habitat in the 36-square mile project area. Yet there have been no surveys. Suitable habitat for this species has not been mapped as well. The agency does note that some of this remaining habitat will be clearcut, and thus removed for the next hundred years, or longer. Since this owl nests in very large snags, development of these large snags in clearcuts will take over 100 years. There were no surveys to demonstrate that this habitat is not currently occupied by Flammulated Owls. Thus management recommendations identified on the Targhee National Forest (USDA 1997) to have a 30-acres "no harvest" buffer around Flammulated Owl nests cannot be implemented for this sensitive species. Even if nest sites are not logged, there is a high potential that nestling owls can be killed due to smoke toxicity from prescribed burning (Defiance Canyon Raptor Rescue 2022). In summary, the potential impacts to this sensitive species are unknown, but potentially could eliminate this species from this project area.	Effects to flammulated owls were analyzed in the Wildlife Report (Pages 62-68). Habitat modeling was used to determine available habitat in the project area. Only 4% of the project area is currently considered suitable habitat, meaning flammulated owl current use is likely limited. Snag retention guidelines would be used in treatement areas, including the 1% of the project area where treatment effects would overlap suitable flammulated owl habitat.
105	5-AWR	Wildlife	General	The Forest Plan Standards are not being met and therefore this is a NEPA, NFMA and APA violation.	Please refer to the EA and the wildlife specialist report with appended terrestrial biological assessment and wolverine biological assessment for the wildlife-specific relevant forest plan standards and how they are being met with this project.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
189	14-NEC	Wildlife	Goshawk	In addition, the agency has not demonstrated that mitigation measures proposed for the Northern Goshawk will actually be implemented. Without a demonstration of where goshawk nests and post-fledging area currently exist in the project area, the agency has not demonstrated to the pubic that a 40-acre buffer will be provided around known nests, or that activities will not occur within post-fledging areas until after juvenile goshawks have fledged. In addition, the agency has not demonstrated specifically how "sufficient" canopy cover will be maintained in goshawk post-fledging areas. In particular, the agency has not demonstrated that the project design for vegetation treatments included any mitigation measures for goshawks. As such, the agency is not going to provide this information to the public, in violation of the NEPA. In addition, the agency is violating the NEPA by claiming that "hypothetical" mitigation measures, as yet not defined on the ground, will avoid significant adverse impacts to goshawks. The purpose of a site-specific project is to define how wildlife mitigation measures have been implemented as a part of vegetation treatments.	Surveys were completed for goshawk nests within the project area and none were detected. Resource protection measure RPM WILD-9 regarding goshawk nesting buffers would be implemented if new goshawk nests are located.
89	5-AWR	Wildlife	Grizzly	How does the FP complies with the “best available science” on grizzly recovery, or the 2012 Planning Rule that required Forest to emphasize “Connectivity?”	The baseline for connectivity is not likely to be negatively affected by implementing project actions. The current baseline for the Clearwater GBAU does not meet thresholds for secure habitat and OMRD/TMRD. The project could have a beneficial effect by increasing secure habitat and reducing the number of roads. See the grizzly bear portion of the terrestrial BA.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
197	14-NEC	Wildlife	grizzly	Another factor not addressed in road management for grizzly bears is the status of road use due to other past and/or ongoing projects. These at least include the Rice Ridge salvage project, the Seeley Fuels Reduction Proj9ect, and he Auggie Creek Restoration/Fuels project. Since these projects all overlap, the agency needs to define how road management is being coordinated between all these projects to limit bear displacement to acceptable levels, what ever this is determined to be. Currently, the agency has no actual measure of the level of disturbances, combined for acreage of treatments and active motorized routes, that will allow continued grizzly bear use. There should be a target for this allowed level of disturbances within a landscape that has been active for an unknown number of years in the past, as well as will remain active for the next 20 years.	Project implementation would not occur all at once. In general, harvest activities would occur within a five-year timber contract at the beginning of the project, but contracts may be extended up to ten years. Prescribed burning and fuel treatment activities would likely occur after the sales are closed. The project also includes resource protection measure, WILD-6 which states: Within the Primary Conservation Area, use of restricted roads would be limited to six trips (3 round trips) per week or one 30-day unlimited use period during the denning season (December 1-March 31). (Northern Continental Divide Ecosystem Standard – AR-01). The project area primarily occurs within the Clearwater GBAU within NCDE zone 1, with a portion of the project area extending into the Swan and Mission subunits within the PCA. The BA for Grizzly Bear (Wildlife Report, Appendix A) acknowledges *human presence and mechanical activities associated with timber harvest and young forest mechanized thinning could temporarily disturb grizzly bears from the area during implementation.* The BA also determined, *the proposed action involves a pulse of disturbances, but it would not cause long-term or permanent disturbance to grizzly bears. Temporary disturbance would be most intense during the time of the project implementation. Treatments would utilize existing roads and newly constructed roads for motorized travel to access the units and may include roads closed to public access. Disturbance-causing activities would naturally be separated in space and time, given the road systems that access the project area and the spatial juxtaposition of treatment units. Not all treatment areas would be treated at once. Therefore, undisturbed areas would be available for grizzly bears within the analysis area at any given time. Likewise, other areas of the PCA and Zone 1 that are not receiving disturbance-related activities, and where road density levels have been associated with grizzly bear occupancy, would also be available to any bears that are disturbed by the project.* See the project's BA for additional information related to project effects on grizzly bear.
213	16-Johnson	Wildlife	Grizzly	I believe there is a need for more study of the impact on Grizzly Bears in the Highway-83 project.	Consistent with section 7 of the Endangered Species Act, the Forest Service completed a biological assessment for grizzly bear and consulted with the U.S. Fish and Wildlife Service regarding project findings. See the terrestrial wildlife biological assessment in the project record. The FWS provided a biological opinion and concluded the project would not jeopardize the continued existence of grizzly bear.
90	5-AWR	Wildlife	Grizzly	The project will not maintaining and enhancing grizzly habitat and will increase the potential for grizzly-human conflicts in vi¬olation of NFMA, NEPA, the APA and the ESA.	See the grizzly bear portion of the terrestrial BA for habitat analysis and human conflict analysis.
196	14-NEC	Wildlife	grizzly	One factor the agency did not address for the North Seeley project is the impact of traffic levels on grizzly bears. Even if a road is closed to the public, increased traffic levels from logging and other treatments will increase displacement of bears. It is known that bears respond to higher traffic levels with stronger avoidance from roads, with 10 to 20 vehicle trips per day being considered as triggering significant displacement of bears (Northrup et al. 2012; Mace and Manley 1996). We could find no management strategies in the proposed project whereby traffic levels will be restricted and managed to keep levels within tolerable limits for grizzly bears. Since this is a 20-year project, the traffic levels required during implementation need to be addressed as per mitigation for the grizzly bear.	Refer to response to comment #197.

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87	5-AWR	Wildlife	Grizzly	The project and the Forest Plan are not following the best avail¬able science for grizzly bears. The project defines secure grizzly bear habitat as being 10 acres or greater is size. Proctor et al 2020 conclude: Motorized access has been shown to influence grizzly bears at the individual and population levels. People in motorized vehi¬cles affect grizzly bear habitat use, home-range selection, movements, population fragmentation, and demography in¬cluding survival and reproduction, which ultimately affects bear density, population trends, and conservation status. Inte¬grating habitat quality into road management improves the ef¬ficiency and effectiveness in reaching management goals, such as managing for few or no roads within 500 m of habitats con¬taining late summer and autumn hyperphagia food resources, such as major berry fields, salmon streams where bears can ef¬fectively catch fish, and high-quality white- bark pine stands. Further, in populations with moderate habitat quality and close to human settlements, road densities near 0.6 km/km2 with >60% secure habitat (i.e., >500 m from an open road) are meaningful thresholds that, if not exceeded, may allow female grizzly bears to have sustainable survival rates. In other areas, population- specific thresholds may be appropriate, such as where conservation is a major concern, because poor habitat quality limits reproductive rates and very little human- caused mortality can be sustained. In areas that are further from hu¬man population centers and have large patches of high-quality habitat, the bear population could tolerate higher overall road densities provided large, high-quality patches have no roads. Our consensus of prioritizing the use of motorized ac- cess management across occupied grizzly bear terrain was that “Threatened” populations, or populations of conservation concern (documented or suspected popu- lation declines, ex-cessive reported mortality, and areas with high human foot-prints), were a first priority. Next, we conclude that habitat quality is an integral part of understanding grizzly bear re¬sponses to roads and, if integrated, will increase the efficiency and effectiveness of road management programs. Therefore, managers should allow for habitat security with zero or low road densities in high-quality foraging habitats where major summer– autumn hyperphagia energy-rich food sources are used heavily. This could entail maintaining low road densities in currently safe habitats (where habitat quality is high and mortality risk is low) and applying motorized access controls in areas of sink habitats (where habitat quality and road densities are high).	Secure habitat for grizzly bears is specifically defined by the Interagency Grizzly Bear Committee (IGBC) as areas that are at least 500 meters from any motorized access route (Interagency Grizzly Bear Committee (IGBC) 1998).
199	14-NEC	Wildlife	grizzly	The agency did not address how the proposed construction of 23 miles of mountain bike trails will directly and cumulatively impact grizzly bears. This would include the agency's claim that non-disturbance areas will be provided for bears during the 20-year project. Mountain bike trails will be an additional disturbance of high level for grizzly bears (Mattson 2019; Mattson 2020). The design of these trails need to be included in the year-to-year designation of grizzly bear undisturbed areas during the 20-year project implementation, along with an analysis of cumulative effects of all roads, all motorized trails, and mountain bike trails. With respect to mountain bike trails, the effect on mortality rates to grizzly bears also needs to be completed, and of all recreational activities, mountain bikes have the highest potential direct conflict with grizzly bears, including bear removal due to conflicts and/or accidents (Id.).	Potential effects of the proposed 27-miles of mountain bike trails on grizzly bear was considered in the BA (Appendix A of the project's wildlife report). In addition, in response to this comment concerning human-bear conflict on mountain bike trails, RPM WILD-12 was added to the proposed action, stating "To reduce human-bear conflict, bear-aware educational signs would be installed at proposed mountain bike trailheads to inform trail users of possible bear activity in the area." (Appendix C fo the EA).

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
93	5-AWR	Wildlife	Grizzly	The EA is incorrect. The project proposes building 19 miles of new roads which will increase the OMRD and TMRD and there-fore a net decrease in secure habitat in violation of the Forest Plan, NEPA, NFMA, the APA, and the ESA.	Not all 19 miles of proposed new roads are planned to occur within 500 meters of existing secure habitat. Furthermore, there are 154 miles of road decommissioning planned that will increase secure habitat within the project area. Within the Clearwater GBAU, road building would affect about 16 acres of secure habitat, but when fully implemented, road decommissioning is anticipated to increase overall secure habitat by 470 acres. Thus, while a temporary decrease in secure habitat may be observed, a net increase in secure habitat and decrease in OMRD/TMRD will be in place when the project is complete. See the "Secure core/secure habitat" section of the terrestrial BA for how proposed roads are considered for effects to grizzly bears.
97	5-AWR	Wildlife	Grizzly	Nonetheless, you plan to add 0.7 miles of permanent road, construct 28.9 miles of new “temporary” road, and reconstruct 12.4 miles of existing “non-system,” i.e. illegal, roads. You also disclose that you plan to“survey” an¬other 25 miles of illegal roads to analyze whether you want to obliterate them. Do your open road density calculations in¬clude the 37.4 miles of “non-system” i.e. illegal roads in the Project area? Do your open road density calculations include all of the recurring illegal road use documented in your own law enforcement incident reports, as set forth in the attached map and data sheet?	While unauthorized motorized access likely occurs on the Forest, such unauthorized use is not considered a Forest action. The term “action” for Section 7 consultation is defined in the Consultation Handbook (U.S. Department of the Interior and Service 1998) (U.S. Department of the Interior and Service 1998) as: all activities or programs of any kind authorized, funded, and/or carried out, in whole or in part, by Federal agencies in the United States or upon the high seas. These and any other unauthorized activities are not the result of a federal action and therefore not analyzed under effects of the action. See"Unauthorized Motorized Use" section of the grizzly BA and other supporting documentation in the project record for how unauthorized access is considered for describing environmental baseline.
136	5-AWR	Wildlife	Grizzly	Grizzly bears use habitats less than ex¬pected when ORD exceeds one mile per square mile and total road density (TRD) exceeds two miles per square mile. (Mace and Manley 1993). Open roads contribute to grizzly bear mor¬tality by poaching and, especially during the black bear hunt¬ing season, by mistaken killing. (Holland 1985).	Within management zones outside of the recovery zone, road densities are managed according to the Forest Plan baseline. In this case, the 2011 baseline for open motorized route densities was 1.3 miles/square mile. Zone 1 currently meets this baseline with an OMRD of 1.1 miles/square mile. Within the project area, road densities are higher due to the high volume of undetermined roads acquired with newly acquired lands. However, the project proposed to decommission many of these roads which would result in a OMRD lowered from 3.9 miles/square mile to 2.2 miles/square mile, which is an improvement to the current conditions.
194	14-NEC	Wildlife	Grizzly	Although the North Seeley Project area is in Zone 1 for grizzly bear management, management of this habitat outside the PCA is important for grizzly bear population persistence and expansion. These Zone one occupied grizzly bear areas include 35% of the total occupied habitat for bears, meaning that a third of their occupied habitat is outside the PCA. As was noted previously, the North Seeley project area has 383 miles of road within the 36 square mile project area, which equates to over 10 miles per section of total roads. The status of motorized travel on these roads is unknown, including the 240 miles of undetermined roads. Although some of these roads may be physically undrivable due to ingrowth of trees in the road bed, or failures of the road itself, there will be many miles will likely still receive public use without these roads having gates. There was no information provided as to how many of these road miles are actually blocked for vehicle travel. Thus the current density of public use on these roads is unknown. It is clear that public use poses a greater mortality hazard to grizzly bears than administrative use (Proctor et al. 2019). The actual level of public use on this vast network of roads is unknown, so that mortality risks to grizzly bears in this project area are unknown.	Please see the terrestrial BA (appended to the project's Wildlife Report) for how roads will be managed. All undetermined roads being added to the Forest System roads will be gated and closed to the public or stored. For the secure habitat analysis, roads that are open to the public, gated for administrative use, or not barriered/closed for all vehicles were assumed to have potential impacts and were buffered by 500 meters. Also refer to the terrestrial biological assessment, the "Project Consideration of Unauthorized Motorized Use for NEPA Analysis" document, and other supporting information in the project record for further details regarding unauthorized use.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
88	5-AWR	Wildlife	Grizzly	The well-established scientific consensus is that roads pose the most imminent risk to this grizzly population. Ninety percent of this population's Recovery Zone habitat is located on public Na¬tional Forest lands. Thus, the federal government has the power to limit road density for grizzly bear protection on the vast ma-jority of its habitat and thereby prevent the extinction of this grizzly population. However, the U.S. Forest Service has prepared multiple years of monitoring reports regarding its implementation of road closures in grizzly habitat. These monitoring reports establish that these road closures are routinely violated and therefore ineffective: members of the public regularly ignore signs, drive around gates or earthen berms, remove obstructions such as boulders or logs, or simply create their own new motorized routes. Please disclose how often closed roads are monitored for closure violations. Please disclose all of the road closure violations in the Flathead National Forest over the last 5 years. The recurring problem of road closure failures undermines the foundation of the Flathead Forest Plan management regime, which relies on these road closures to achieve certain densities of open and total roads both inside and outside the Recovery Zone. The agencies must address this problem and its impacts in an updated ESA consultation for the Flathead Forest Plan. The agencies must also address this problem and its impact in an up¬dated ESA consultation and in the special use projects and is an¬other reason that an EIS should be written for the spexial use Projects.	Most of the yearlong and seasonally closed roads within the project area are not drivable due to vegetation in the roadway (refer to Transportation Survey and Specialist report in the project record). Thus, these closures are effective in prohibiting motorized use. Please refer to the terrestrial biological assessment, the "Project Consideration of Unauthorized Motorized Use for NEPA Analysis" document, and other supporting information in the project record for further details.
91	5-AWR	Wildlife	Grizzly	The Forest does not have a good track record of keeping closed roads closed. The Forest Service does not disclose the road mileage behind these ineffective closures; therefore it is unclear how many miles of additional open and total roads must be added to the existing condition calculations as a result of these ineffective closures.	Refer to respone to comment #97

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
195	14-NEC	Wildlife	grizzly	What is never addressed in the North Seeley project is the displacement impact of both logging roads (up to 224 miles of logging roads with existing 128 miles and added 96 conversions of undetermined roads along with additions of 9 miles of new roads) and the displacement impacts of treatments on almost 8,000 acres of grizzly bear and wolverine habitat. The Forest Plan direction for grizzly bears is clearly inadequate to measure displacement impacts of vegetation treatments, as there is no actual measure of this displacement. The only measure for project impacts in Zone 1 for occupied grizzly bear habitat is "no net increase of open roads." This means that once the project completion is done within the 20-year period, roads open to the public must be the same as when the project started. The roads open to public travel during project implementation is never considered for adverse impacts. It is impossible to determine what the level of roads with public access will be during project implementation over 20 years, as this information was never provided. The mileage of roads closed to public use on paper will not be the same as roads closed to public travel on the ground (gates, barriers, etc.). The agency needs to provide the complete information as to how roads will be managed in the North Seeley project during the 20-year implementation period as per enforceable public access. For example, if undetermined roads are improved on 96 miles, how will the public be prevented from motorized use of these roads? We contend that due to a lack of adequate disclosure and planning, the agency cannot demonstrate compliance with the "no net increase in roads open to the public in Zone 1 once this 20-year project is completed. As such, we contend that the agency is not demonstrating to the public that this Forest Plan standard will be met, in violation of both the NEPA and the NFMA. Unless the agency fully demonstrates what roads will be open to the public at the end of the project in 20 years, and are closed on the ground and not just on paper, the agency needs to complete a Forest Plan amendment for this standard.	Refer to response to comment #197 and 194.
92	5-AWR	Wildlife	Grizzly	because “undetermined” is a sub-catego¬ry of “unauthorized” roads, it is possible that the particular un-determined roads at issue in this case were created—without au-thorization from the Forest Service—in the interim between the measurement of the Forest Plans baseline and the Forest Ser-vice’s survey of existing roads for the Project.	Refer to respone to comment #97
198	14-NEC	Wildlife	grizzly	The wildlife report noted that "adequate security areas" for the grizzly bear will be provided during the 20-year project implementation that would somewhat address our issue above, in that disturbances to the grizzly bear need to be controlled over time so that bears will continue to use this landscape. Although the wildlife report claimed that these non-disturbance areas will be maintained across the project area during project implementation, these areas were never provided. It remains unclear if such non-disturbance areas are actually a part of this project. Since the agency claims this mitigation measure will be implemented, the actual management strategy for these non-disturbance areas for grizzly bears during the 20-year project need to be mapped and defined as per coordination with both vegetation treatments and motorized access.	Refer to response to comment #197 and 194.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
94	5-AWR	Wildlife	Grizzly/ Elk	As the EA states on page 7: There are over 230 miles of unde-termined roads, mostly within the acquired lands. CHRONIC, RECURRING ROAD CLOSURE VIOLATIONS You state: “Logging activity, road construction, and use of closed roads for hauling would result in short-term displace-ment of elk. These roads would be decommissioned post project implementation and with the cessation of logging activ¬ity elk use of these areas should resume.” This conclusion, and your analysis in general, fail to take a hard look at the true envi¬ronmental impacts of chronic, recurring illegal road use in the Little Belts. Considering your own admissions that road density is the prima¬ry factor that degrades elk and grizzly habitat, this is a material and significant omission from your analysis– all of your ORD and HE calculations are wrong without this information.	These majority of the undetermined roads are not the result of chronic, recurring road closure violations, but rather the result of the FS acquiring lands with roads that have not been incorporated into the FS road system yet. Undetermined roads that are not barriered or permanently closed were considered in all grizzly bear and elk analyses as potential areas of effect. These roads were buffered and secure habitat was not considered to exist where undetermined roads occur to assess the highest possible level of effect.
99	5-AWR	Wildlife	Grizzly/ Elk	And for both elk and grizzly bears, it appears that logging and other administrative motor¬ized traffic is not included in displacement effects on either species. So the impact of motorized travel is apparently not be¬ing measured correctly. We note that the Eastside Assessment requires that road traffic over 2 trips per 12 hours is a displace¬ment effect on elk.	Grizzly bear secure habitat and TMRD analyses include administrative and temporary access per protocols. Where access is allowed from the public or forest personnel, effects were considered to occur. The Elk/big game analysis in the Wildlife BE does include administrative and temporary access in its analysis. Where temporary administrative use for project activities and impacts from public use occur, effects were considered and indicated in the conclustions.
100	5-AWR	Wildlife	Grizzly/ Elk	Please clarify what is going on. Have you closed or obliterated all roads that were promised to be closed or obliterated in the Travel Plan? Or, are you still waiting for funds to close or oblit-erate those roads? This distinction matters because you cannot honestly claim that you are meeting road density standards promised by the Travel Plan if you have not yet completed the road closures/obliterations promised by the Travel Plan.	All road analyses assumed the highest potential for effect. Where barriers or closures were unknown, analyses considered roads to affect secure habitat and use.
101	5-AWR	Wildlife	Grizzly/ Elk	Fur-thermore, as noted above, there are recurring, chronic violations of the road closures which means that your assumptions in the Travel Plan that all closures would be effective has proven false. For this reason, you cannot tier to the analysis in the Travel Plan because it is invalid. You must either complete new NEPA analysis for the Travel Plan on this issue or provide that new analysis in the NEPA analysis for this Project. Either way, you must update your open road density calculations to include all roads receiving illegal use.	All road analyses assumed the highest potential for effect. Where barriers or closures were unknown, analyses considered roads to affect secure habitat and use. Please refer to the terrestrial biological assessment, the "Project Consideration of Unauthorized Motorized Use for NEPA Analysis" document, and other supporting information in the project record for further details regarding unauthorized use.
107	5-AWR	Wildlife	Grizzly/ Elk	The project is in violation of NEPA, NFMA, the Forest Plan, The Travel Plan, the APA and the ESA because of the recurring road closure violations. your assumptions in the people are not using the 230 miles of undetermined (illegal) road has proven false. For this reason, you cannot tier to the analysis in the Trav-el Plan because it is invalid and the project violates the Forest Plan standards for elk and grizzly bears.	Refer to response to comment #101.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
161	5-AWR	Wildlife	Grizzly/ Elk	It is not clear if the Forest Service is including the trails they are building as part of the project in the road/trail density.	The trails proposed for this project are for Nordic skiing and mountain biking. Since there is not a motorized component, they were not considered in the road density calculations.
169	14-NEC	Wildlife	Hairy WP	The Hairy Woodpecker is identified in the Lobo Forest Plan as the Management Indicator Species (MIS) for snag habitat. There does not appear to be any monitoring data available for this MIS on the Lobo National Forest, as per the most recent Biennial Monitoring Report, of the North Seeley Project analysis. To date, the Lolo Forest Plan has not monitored Hairy Woodpeckers. The proxy for populations of Hairy Woodpeckers appears to be the number of snags and sizes required per acre by the Forest Plan. There is to date no actual analysis as to why snag numbers are a "proxy" for Hairy Woodpecker populations. Use of snag numbers has been previously noted as an invalid measure of associated bird populations in a Forest Service document, Bull et al. (1997). In spite of this use of an invalid proxy of snag numbers to measure population trends of associated birds, the agency has failed to amend the Forest Plan to incorporate this updated research, in violation of the NEPA, the NFMA, and the MBTA. Some of this new science demonstrates that up to only 4% of snags provide suitable cavity sites for wildlife (Vizcarra 2017).	The hairy woodpecker is not identified as a management indicator species in the Lolo Forest Plan, and thus species-specific monitoring is not included in the biennial monitoring report. Forest Inventory and Analysis (FIA) National Program database is used to monitor the quantity of large snags on the Forest.
84	5-AWR	Wildlife	Lynx	Please complete a biological assessment for lynx and formally consult with USFWS regarding the project's potential impacts on lynx.	Consistent with section 7 of the Endangered Species Act, the Forest Service completed a biological assessment for Canada lynx and consulted with the U.S. Fish and Wildlife Service regarding project findings. The FWS prepared a biological opinion and found the project is not likely to jeopardize the continued existence of this species.
185	14-NEC	Wildlife	lynx	In addition, the current best science demonstrates that the amount of clearcut area within occupied lynx habitat, which certainly would include occupied critical habitat, as occurs in the North Seeley project area, that the percentage of the landscape that is in clearcut conditions should be no greater than 5% (Holbrook et al. 2019; Kosterman et al. 2018). This means that the Lobo Forest Plan is violating both the NEPA, the NFMA and the ESA by failing to use the current best science to manage clearcutting within occupied lynx habitat. The current level of openings within lynx habitat in the Rice LAU (noted in the section below on lynx) is 13.5% for lynx habitat, which does not include areas not mapped as lynx habitat in this LAU. This is over 2 times the percentage of the landscape found in openings in productive lynx breeding habitat (Id.). Post project, the percentage of openings will increase to 33%, or over 5 times the level found in productive lynx breeding habitat, including the landscape surrounding the North Seeley Project (Id.). The lobo Forest Plan does not restrict the percentage of clearcuts in occupied lynx habitat, and as such, needs to be amended to address what are ongoing severe impacts on lynx due to clearcutting, including what would occur in the North Seeley Project.	Lynx habitat was analyzed using NRLMD guidelines, which is the current standard for Section 7 consultation. Acres of treatment proposed in lynx habitat were assessed using the broadscale mapping in the Lolo lynx habitat model, which was then updated based on site-specific information on existing habitat characteristics from on-site surveys. Please refer to the BA for further information on NRMLD standards and analysis methods for regeneration harvest.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
202	14-NEC	Wildlife	lynx	The North Seeley project will also exacerbate what is an existing significant impact on lynx as per the percentage of openings in the Rice LAU. Currently, there are at least 2,787 acres of openings or clearcuts in this LAU, which represents at least 13.5% of the LAU. This is over 2 times the level of openings (generally 5%, including in core areas) identified in productive lynx habitat (Holbrook et al. 2019; Kosterman et al. 2018). This does not count the other 4015 acres of what is defined as non-lynx habitat in this LAU. With project implementation, there will be 33% clearcut openings in this LAU, which is over 6 times the level of clearcuts found in productive lynx habitat (Id.).	Refer to reponse to comment #185.
78	5-AWR	Wildlife	Lynx	The Forest Plan requires the Forest Service to demonstrate that the project retains lynx connectivity. The EA and FONSI do not do this in violation of the Forest Plan.	Impacts to lynx connectivity was analyzed in the BA, which is appended in the wildlife specialist report (Appendix A) and summarized in the EA, and concluded that use in connectivity would be altered but overall retained. The project would maintain all elements necessary for lynx to move across the landscape. Vegetation treatments would maintain a mosaic of forested cover to provide for lynx travel. Regeneration harvest activities would not create conditions that are unsuitable for lynx travel (Squires et al. 2013).
201	14-NEC	Wildlife	lynx	The North Seeley Project Area is known to provide lynx habitat (Squires et al. 2010). This area is completely identified as well as critical lynx habitat. Forest Plan standard ALL S1 requires the agency to maintain habitat connectivity for lynx during vegetation treatments. There is no actual analysis of how the project will impact lynx habitat connectivity. The current best science defines lynx habitat connectivity as at least 50% undisturbed mature forest and at least about 20% regenerating forests, both of which provide cover (Holbrook et al 2010; Kosterman et al 2018). This would provide 70% habitat connectivity. The North Seeley project area includes mostly the Rice Landscape Analysis Unit (LAU). Current connectivity is roughly 67%, including 13,882 acres of forested cover. This is an estimate as the remaining 4051 acres defined as non-lynx habitat in this LAU is unknown. If these other acres do not provide connectivity, then landscape connectivity in this LAU will actually be lower. Under the best of circumstances, current connectivity may be close to the recommended 70% as per current best science. Post project, this connectivity will decline to about 48% due to the harvest/thinning activity on 4018 acres, leaving 9864 acres of cover. This again is a best guess estimate, as the connectivity value of the remaining 4015 acres of what is defined as "non-lynx habitat" in this LAU is unknown. Based on this cursory analysis, habitat connectivity will be reduced from suitable to unsuitable levels with this project, which is a Forest Plan violation. As has been noted in the current best science, lynx significantly avoid all vegetation treatment units for up to 40 or more years, with the most significant avoidance occurring in clearcuts (Holbrook et al. 2019). The failure of the agency to evaluate project impacts on lynx connectivity is also a NEPA failure.	Refer to respone to comment #78.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
184	14-NEC	Wildlife	lynx	There was no analysis in the North Seeley project as to how large clearcuts would create movement barriers for the lynx. As per Squires et al. (2010), the average crossing distance of openings for lynx, including within this landscape, is 283 feet. It is likely that this distance will be exceeded by most of the planned clearcuts for this project, including those over 40 acres in size. Holbrook et al. (2018) noted that clearcuts were avoided for lynx for 10 years.	Refer to respone to comment #78.
79	5-AWR	Wildlife	Lynx	Has the Lolo N.F. removed any or parts of any lynx analysis units with out taking public comment in violation of NEPA?	No LAUs were altered for this project.
83	5-AWR	Wildlife	Lynx	In order to meet the requirements of the FS/USFWS Conserva¬tion Agreement, the FS agreed to insure that all project activities are consistent with the Lynx Conservation Assessment and Strategy (LCAS). LCAS requirements include: Project planning—standards. 1. Within each LAU, map lynx habitat. Identify potential den-ning habitat and foraging habitat (primarily snowshoe hare habi¬tat, but also habitat for important alternate prey such as red squirrels), and topographic features that may be important for lynx movement (major ridge systems, prominent saddles, and ri¬parian corridors). Also identify non-forest vegetation (meadows), shrub-grassland communities, etc.) adjacent to and intermixed with forested lynx habitat that may provide habitat for alternate lynx prey species. 2.Within a LAU, maintain denning habitat in patches generally larger than 5 acres, comprising at least 10 percent of lynx habi¬tat. Where less than 10 percent denning habitat is currently present within a LAU, defer any management actions that would delay development of denning habitat structure. 3.Maintain habitat connectivity within and between LAUs. Programmatic planning-standards. 1.Conservation measures will generally apply only to lynx habi¬tat on federal lands within LAUs. 2.Lynx habitat will be mapped using criteria specific to each geographic area to identify appropriate vegetation and environ¬mental conditions. Primary vegetation includes those types nec¬essary to support lynx reproduction and survival. It is recognized that other vegetation types that are intermixed with the primary vegetation will be used by lynx, but are considered to contribute to lynx habitat only where associated with the primary vegeta¬tion. Refer to glossary and description for each geographic area. 3.To facilitate project planning, delineate LAUs. To allow for assessment of the potential effects on an individual lynx, LAUs should be at least the size of area used by a resident lynx and contain sufficient year-round habitat. 4.To be effective for the intended purposes of planning and monitoring, LAU boundaries will not be adjusted for individual projects, but must remain constant. 5. Prepare a broad-scale assessment of landscape patterns that compares historical and current ecological processes and vegeta¬tion patterns, such as age-class distributions and patch size	Consistent with section 7 of the Endangered Species Act, the Forest Service completed a biological assessment for Canada lynx and consulted with the U.S. Fish and Wildlife Service regarding project findings. The FWS prepared a biological opinion and found the project is not likely to jeopardize the continued existence of this species. See the lynx BA for details about the NRLMD standards and analysis, which includes the referenced LCAS requirements.

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80	5-AWR	Wildlife	Lynx	Please find “Correlates of Canada Lynx Reproductive Success in Northwestern Montana” by Megan K. Kosterman and “Under-standing and predicting habitat for wildlife conservation: the case of Canada lynx at the range periphery” by HOLBROOK et al that confirms Kosterman’s findings. Does the action alternative comply with Kosterman and Hol-brook’s recommendations?	Lynx habitat was analysed using NRLMD standards which include standards for the habitat types referred to in both publications. See the lynx BA for detailed information of how those habitat types were analyzed. These publications were not provided for detailed review with the comment letter.
85	5-AWR	Wildlife	Lynx	THE AGENCIES MUST REINITIATE CONSULTATION ON THE NORTHERN ROCKIES LYNX MANAGEMENT DIRECTION. The Northern Rockies Lynx Management Direction is inade¬quate to ensure conservation and recovery of lynx. The amend¬ments fail to use the best available science on necessary lynx habitat elements, including but not limited to, failing to include standards that protect key winter habitat.	The standards agreed upon in the NRLMD was an interagency process between the USFS and USFWS. The Record of Decision for the NRLMD (pg 8) states “We determined, through our analysis and with concurrence from FWS, the selected alternative contributes to conservation and recovery of lynx, while allowing some activities to occur in lynx habitat that may have some adverse effects on lynx. We determined it was important and acceptable to restore tree species in decline and address wildland fire risks to communities. This decision allows some possible adverse effects on 6.5 percent of lynx habitat (through a combination of fuels treatment in the wildland urban interface (WUI) and precommercial thinning). However, all vegetative standards remain applicable to 93.5 percent of lynx habitat.” This suggests the standards agreed upon may have adverse effects to lynx; however, adherence to the terms and conditions set by USFWS should support lynx viability and recovery of the species.Management activities on the Lolo National Forest must comply with the standards outlined in the Northern Rockies Lynx Management Direction (NRLMD), amended to the Forest Plan in 2007. The NRLMD describes the habitat management considerations needed to ensure lynx recovery. However, the project’s biological determination for the species is based on several factors, compliance with the NRLMD is just one of them (see EA, section 3.8.3 and associated BA). The project is consistent with the recommendations in the recent scientific literature (EA, section 3.8.3 and associated BA). The FWS prepared a biological opinion and found the project is not likely to jeopardize the continued existence of this species.
173	14-NEC	Wildlife	Lynx	Is the existing old growth suitable for the threatened Canada lynx (hereafter "lynx")? This species is known to select for mature and older forests that have the following characteristics: Mid-seral stands over 40 years in age arranged in a multi-storied structure with a mixed species composition, with abundant spruce-fir; have a median canopy cover of 56%, a median tree height of 65 feet, a median basal area of 140 square feet per acre; trees over 5 inches dbh average 217 per acre, and trees under 5 inches dbh average 1500 trees per acre (Holbrook et al. 2017).	Lynx habitat was analyzed using NRLMD guidelines, using mature multistory and stand initiation habitat types rather than old growth. Acres of treatment proposed in lynx habitat were assessed using the broadscale mapping in the Lolo lynx habitat model, which was then updated based on site-specific information on existing habitat characteristics from on-site surveys (see project record). Please refer to the BA for further information on existing habitat and analysis methods.
204	14-NEC	Wildlife	lynx	The agency mispresented roading impacts on lynx. As per Squires et al. (2010) it was noted that lynx did not avoid roads with low volumes of traffic, defined as 8 or fewer vehicles per day. The analysis of roading impacts on lynx instead claims that vehicle traffic does not affect lynx, which means the impact of the North Seeley Project on lynx due to roads was incorrect.	The analysis includes short-term disturbance during road treatments. Overall, roads within the project area will be reduced by decommissioning and all roads being retained will be maintained as unpaved dirt and gravel roads with no public use. Roads analysis can be found in the Canada lynx biological assessment.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
82	5-AWR	Wildlife	Lynx	(3) USFS has failed to survey for lynx as required by the Biolog¬ical Opinion on the Northern Rockies Lynx Management Direc¬tion (NRLMD).	The Montana Natural Heritage Program database was used to identify lynx presence within the project area. Sufficient data was available from previous surveys and research efforts to determine the presence of lynx within the project area and the analysis was conducted accordingly. See the lynx BA for details about lynx presence within the project area.
203	14-NEC	Wildlife	lynx	The agency will also violate the Forest Plan due to allowing exceptions and exemptions of multi-storied lynx habitat (1,730 acres), and thinning of regeneration habitat (146 acres), outside the Wildland Urban Interface. These exceptions and exemptions for the North Seeley project will occur outside the WUI, which is not defined correctly for this project. This WUI as per the Northern Rockies Lynx Management Direction and Heathy Forest Restoration Act (HFRA) defines the WUI as a mile within interface and intermix communities. This definition was not used for the North Seeley project WUI definition.	Please refer to the Fire and Fuels Specialist Report, Appendix B- Highway 83: North Seeley WUI Project Alignment with Wildland Urban Interface and the Definitions Used in the Healthy Forest Restoration Act for the Purpose of Applying the NRLMD WUI Exemption. This was added after the comment period to clear up any remaining confusion regarding the WUI.
81	5-AWR	Wildlife	Lynx	1) USFS needs to take a hard look at impacts to lynx under NEPA, apply the lynx conservation measures and standards of the NRLMD, and consult on lynx via section 7 of the ESA b/c the best available science -- including recent tracking surveys conducted by WTU -- confirm lynx's presence and use of the area;	Consistent with section 7 of the Endangered Species Act, the Forest Service completed a biological assessment for Canada lynx using NRLMD standards and conservation measures and consulted with the U.S. Fish and Wildlife Service regarding project findings. The FWS prepared a biological opinion and found the project is not likely to jeopardize the continued existence of this species. Lynx are already well-documented in the project area.
86	5-AWR	Wildlife	Lynx	The Forest Service did not respond to all of the issues, concerns, and questions we raised about lynx and lynx critical habitat in violation of the ESA, NEPA, NFMA, and the APA. The Forest Service did not adequately show that the Round Star project complies with the law.	The Round Star project is located on the Flathead National Forest. The Forest Service is responding to comments for the North Seeley WUI-Highway 83 project, on the Lolo National Forest, including comments regarding lynx and lynx critical habitat, in adherence to NEPA at this time. Project adherence to other applicable laws regarding lynx is disclosed in the BA.
187	14-NEC	Wildlife	Migratory birds	The agency did not demonstrated that "beneficial practices" are being implemented to mitigate for mortality created for landbirds, including neotropical migratory birds, from the proposed North Seeley Project. The USFWS has identified that federal agencies must employ "beneficial practices" in projects to reduce the mortality to neotropical migratory birds (USFWS 2021; USFWS 2022). These practices include no activities during the complete nesting season for birds (December through August) or the minimum nesting protection period of April 1 through August 15. The Forest Service has not indicated any of these beneficial practices will occur for this project, thus reducing incidental take of birds. Logging is not limited to begin until after mid-August, so that nests and fledgling birds are not destroyed. In addition, prescribed burning is not restricted to mid-August or later. So the number of nestlings and fledglings that are directly killed by fire or fire toxicity is unknown (Defiance Canyon Raptor Rescue 2022). Nor is the impact of reduced fitness on adult birds due to smoke toxicity. In summary, the Forest Service is required by both the NEPA and the Migratory Bird Treaty Act (MBTA) to estimate the mortality a project will trigger to landbirds, including neotropical migratory birds, and whether this estimate is expected to significantly impact the density of local bird populations.	As indicated in the EA, treatments are limited to less than 40% of the project area, leaving sufficient area to support a diversity of migratory bird species within the project area. Even within treated areas, most treatments will occur over a five-year period limiting the total temporal window for disturbance. Moreover, treatments will not occur everywhere in a single season, allowing for some areas to have limited or no disturbance even within the proposed treatment. The project abides by all standards and guidelines within the plan, including protections for old growth, mature multistory forest habitats, and riparian areas, further supporting a matrix of habitat types within the plan area. Finally, best management practices and resource protection measures that protect coarse woody debris, snags, and nests, as well as those that implement time restrictions for operation (e.g., WILD-4, WILD-10, WILD-11) further reduce negative effects to migratory bird populations (Appendix C of the EA). In total, the protections and management practices outlined within the EA are designed to support healthy bird populations within the project area and the Forest, and represent practicable measures aimed at avoiding and minimizing consequences for individual birds and their habitats while meeting the purpose and need of the project.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
70	5-AWR	Wildlife	MIS	Forest Plan monitoring requirements have not been followed. The EA and DN do not disclose if the management indicator species (MIS) pileated woodpecker and goshawk are at naturally abundant levels. Habitat for those, and other Sensitive species would be reduced by the project in the absence of viability as¬surance. For viability to be insured, the FS must provide a sound, scientifically based analysis that determines the quantity and quality of habitat needed for MIS and TES species.	Determining the quantifiable amount of suitable habitat within the project area for MIS and TES species was done using various methods, primarily with multiple species-specific habitat models. Please refer to the wildlife specialist report, terrestrial biological assessment, and wolverine biological assessment for details regarding each scientifically based method. In addition, the Forest Service has conducted Forest Plan Monitoring documented in the Biannual Monitoring and Evaluation Report (BMER) in the project record and also available online at https://www.fs.usda.gov/r01/lolo/planning.
165	14-NEC	Wildlife	OG/Snag	The analysis of old growth and snag associated wildlife violates the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), the Administrative Procedures Act (APA), the Endangered Species Act (ESA), and the Migratory Bird Treaty Act (MBTA). The status of old-growth and snag-associated wildlife on the Lobo National Forest is unknown, so project impacts are also unknown .	Acres of old growth are provided in the EA Section 3.2 as well as the Vegetation Report, Appendix 5 Old growth summary. Green et al. 2011 is used across the forest as the best available science for assessing old growth characteristics. However, old growth assessments in Management Area 21 specifically followed Forest Plan Standard 4 as required by the Forest Plan. Refer to the Vegetation Specialist Report and associated appendices for additional details added after the comment period for clarification. Forest-wide, the Lolo NF uses Forest Inventory and Analysis (FIA) data to monitor old growth and snag densities. Species associated with old growth were assessed using various species-specific habitat models which take into account more than just old growth definitions. Please refer to the wildlife report, associated habitat model descriptions in the project record, and the biological assessments for further details.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
166	14-NEC	Wildlife	OG/Snag	The following 18 bird species are associated with old growth forests that require snags for nesting and/or foraging: as per USDA 2018, USDA 1990: Black-backed Woodpecker, Three-toed Woodpecker, Boreal Owl, Brown Creeper, Chestnut-backed Chickadee, Flammulated Owl, Hairy Woodpecker, Lewis's Woodpecker, Pileated Woodpecker, Vaux's Swift, Winter Wren, Great Gray Owl, Northern Pygmy Owl, Northern Saw-whet Owl, Barred Owl, White-headed Woodpecker, Red-naped Sapsucker, and Williamson's Sapsucker. In addition to these old-growth associated wildlife species, the following 15 bird species also require snags for nesting and/or foraging: American Kestrel, Black-capped Chickadee, Boreal Chickadee, Downy Woodpecker, House Finch, House Sparrow, Mountain Bluebird, Mountain Chickadee, Northern Flicker, Pygmy Nuthatch, Red-breasted Nuthatch, White-breasted Nuthatch, Tree Swallow, Violet-green Swallow, Western Bluebird. Of these species, 8 are Montana Species of Concern (MSOC): Brown Creeper, Flammulated Owl, Lewis's Woodpecker, Pileated Woodpecker, Great Gray Owl, Red-naped Sapsucker, Williamson's Sapsucker, Vaux's Swift. Of these species, 2 are Birds of Conservation Concern (BCC) for Bioregion 10 of the U.S. Fish and Wildlife Service: Lewis's Woodpecker and Williamson's Sapsucker. The Montana Partners in Flight Program (2000) has identified the following 3 old-growth and/or snag-dependent wildlife species as Priority I species, identifying a clear obligation to implement conservation strategies: Flammulated Owl, Black-backed Woodpecker, and Brown Creeper. The Montana Partners in Flight Program (2000) has identified the following 8 old growth-snag associated bird species as Priority II species, identifying an need for population monitoring to determine trends: Vaux's Swift, Lewis's Woodpecker, Red-naped Sapsucker, Williamson's Sapsucker, Three-toed Woodpecker, Pileated Woodpecker, Northern Flicker, and Winter Wren. Even though the status of these old growth/snag dependent bird species in the North Seeley Project is unknown, either in the project area or on the Lolo National Forest, the agency has arbitrarily determined that treatment of habitat for these species on approximately 8,000 acres	Determining the quantifiable amount of suitable habitat within the project area for these listed species that are considered Lolo NF MIS and TES species was done using various methods, primarily with multiple species-specific habitat models. Please refer to the wildlife specialist report, terrestrial biological assessment, and wolverine biological assessment for details regarding each scientifically based method. Snag management is guided by 1) the Lolo National Forest Dead and Down Habitat Components Guidelines (June 1997), 2) Northern Region Snag Management Protocol (2000), 3) the Lolo National Forest 2006 Down Woody Material Guide (Stewart et al. 2006), and 4) the LNF Forest Plan Appendix N." Science is cited throughout these guiding documents and provides the Forest with recommendations on snag retention.
177	14-NEC	Wildlife	OG/Snag	The current estimate of old growth on the Lolo National Forest, as per HA data, I is 8.63%, which is not even half of what is recommended for forest birds, or for the Pileated Woodpecker (25% as per Bull and Holthausen 1993). The North Seeley Project area appears to have 254 acres of old growth, which is 1.1% of the 22,997 acre project area. Of this old growth, it will all be logged, and thus removed. So the project area will end up with "zero" old growth.	The Lolo Forest Plan does not contain standards for retaining a specific level of old growth. Treatments would occur within old growth; however, not all old growth would be removed. Refer to Appendix 5 and 8 of the forested vegetation report regarding existing and post-implementation conditions of old growth.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
167	14-NEC	Wildlife	OG/Snag	There have been no snag inventories within any proposed unit, so it is unknown if existing levels of snags meets the Lolo Forest Plan direction. Distribution of snags within units is essential for wildlife, as snags need to be available on at least every 25 acres (Bull et al. 1997). It is also unknown if Forest Plan requirements for snags is met within the complete project area on any past/ongoing treatment units. The agency is using the FIA data developed for the entire forest as a measure of snags within the North Seeley project area, which is a NEPA violation. Snag densities within the project area and within treatment units is required information not just for analysis of project impacts, but as essential information to the public. Although the agency contends that Forest Plan snag requirements will be met within all proposed treatment units, this is an arbitrary claim because it is not known if these units contain the minimum number and size of snags directed by the Forest Plan.	Forest Inventory and Analysis (FIA) National Program database is used to monitor the quantity of large snags on the Forest. Snag management is guided by 1) the Lolo National Forest Dead and Down Habitat Components Guidelines (June 1997), 2) Northern Region Snag Management Protocol (2000), 3) the Lolo National Forest 2006 Down Woody Material Guide (Stewart et al. 2006), and 4) the LNF Forest Plan Appendix N." Science is cited throughout these guiding documents and provides the Forest with recommendations on snag retention.
168	14-NEC	Wildlife	OG/Snag	it is important for the agency to demonstrate from past actions that snag management is being implemented. In this regard, the agency did not provide any monitoring data as per snag numbers within existing treatment units in past/ongoing projects, including the Rice Ridge Fire Salvage sale, the Seeley Fuels Reduction project, and the Auggie Creek Restoration/Fuels Project (project wildlife report at 26). Has the agency achieved Forest Plan direction in these past treatment units? This essential information was never provided.	The Forest Service has conducted Forest Plan Monitoring documented in the Biannual Monitoring and Evaluation Report (BMER) in the project record and also available online at https://www.fs.usda.gov/r01/lolo/planning. The proposed action will retain snag and snag replacements in timber harvest units consistent with the Lolo National Forest Dead and Down Habitat Components Guidelines (1997) and Appendix N of the Forest Plan (EA Appendix C, Table C-2).
176	14-NEC	Wildlife	OG/Snag	If salvage logging has occurred in existing old growth stands, is the remaining density of snags high enough to provide nesting sites for the many wildlife species that require snags for nesting?	Recent previous actions and the proposed action follow Snag management guidelines: 1) the Lolo National Forest Dead and Down Habitat Components Guidelines (June 1997), 2) Northern Region Snag Management Protocol (2000), 3) the Lolo National Forest 2006 Down Woody Material Guide (Stewart et al. 2006), and 4) the LNF Forest Plan Appendix N." Science is cited throughout these guiding documents and provides the Forest with recommendations on snag retention.
62	5-AWR	Wildlife	OG/Snag	Disclose the level of mature and old growth forest neces¬sary to sustain viable populations of dependent wildlife species in the area	The EA contains a summary of the analysis conducted for Region 1 sensitive species in the project area and their habitat. The Wildlife specialist report provides more details on the analysis for each of these species and their habitat. Additionally, snag and coarse wood habitat components for a variety of species were analyzed in the wildlife report. Please see the Wildlife Report for the detailed analysis on these species and their habitat. Regulatory framework is included as a section for each species. Science used to determine the effects to each species and their habitat are cited throughout the analysis.
64	5-AWR	Wildlife	OG/Snag	Disclose the amount of current habitat for old growth and mature forest dependent species in the Project area; TT. Disclose the amount of habitat for old growth and mature forest dependent species that will remain after Project imple-mentation; UU. Disclose the method used to model old growth and mature forest dependent wildlife habitat acreages and its rate of error based upon field review of its predictions.	Habitat methodology, current conditions, and post-implementation conditions are provided on a species-specific basis in the wildlife specialist report.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
67	5-AWR	Wildlife	OG/Snag	The Forest Service cites no scientific information supporting its assumption that what is left behind after this old-growth logging scheme functions as old-growth habitat for wildlife, or is some¬how better in any ecological sense. Managing to extirpate species in a violation of NFMA and the ESA.	The wildlife specialist report discloses habitat suitability post-implementation for various species, including those cases where habitat is altered or removed. While there are many species that would be adversely impacted, no species will be adversely impacted to the point of trending towards federal listing or loss of viability to the population or species. The wildlife specialist report and associated biological assessments demonstrate adherence to Forest Plan Standards 24 and 27.
160	5-AWR	Wildlife	OMRD/ TMRD	Accordingly, the Project EA fails to provide the public with a quantified, detailed cumulative effects analysis of the impact of roads on road-sensitive wildlife species such as elk, lynx, lynx critical habitat, bull trout, bull trout critical habitat, griz¬zly bears, and wolverine – in particular, the Project EA fails to provide an accurate analysis of the cumulative effects of exist¬ing high open road density and lack of secure habitat, existing known unauthorized motorized use, “closed-on-paper” roads that are accessible to motorized vehicles, the decrease in se¬cure habitat from the Project, and the likely increase in unau¬thorized motorized use from newly-constructed Project roads.	Available information regarding illegal use and barriers was provided in the terrestrial wildlife biological assessment and Project Consideration of Unauthorized Motorized Use for NEPA Analysis in the project record, and summarized in the EA grizzly section. This information was used for the road density analyses.
159	5-AWR	Wildlife	OMRD/ TMRD	The Project EA fails to fully and fairly disclose accurate available data to the public regarding roads, and fails to take the requisite hard look at the cumulative effects of existing high road density, new Project roads, pervasive illegal motor-ized use, and roads closed-on-paper-only by the Travel Plans. Grizzly bears, wolverines, lynx and elk are all harmed by mo-torized use, including motorized roads and motorized trails on the Forest. As discussed above, the Forest Service has multiple years of detailed information in its internal files regarding precise loca-tions of illegal motorized use, failed road barriers, and unde-termined roads but it did not disclose this available detailed information to the public in the Project EA or the undeter-mined roads effects on wolverines, grizzly bears, lynx, Lynx critical habitat, bull trout critical habitat, and bull trout. This information is not disclosed to the public in the Project EA, which violates the agency’s obligations to fully and fairly in-form the public, disclose accurate available data, and take a hard look at this issue in the Project EA.	Refer to response to comment #160.
174	14-NEC	Wildlife	Owls	Is the existing old growth in the project area also suitable for old growth-snag dependent owls, such as the Great Gray and Boreal Owls? Both species are noted to be sensitive to heat stress (Hayward 1997; Kashmrl 2013), a factor that will be triggered when old growth forests are opened up with logging.	Great gray and boreal owls are not Region 1 sensitive species on the Lolo NF, and thus were not analyzed individually. As noted in the migratory bird section of the wildlife specialist report, migratory birds are such a diverse group of species that most actions will have a mix of adverse and beneficial effects to the species group. However, snag retention guidelines will be followed throughout the project area.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
178	14-NEC	Wildlife	Pileated WP	the agency claims, without the benefit of any surveys, that the Pileated Woodpecker has "abundant habitat" in the project area (16,679 acres of quality foraging habitat, or 73%). This will be reduced from 13% nesting habitat to 10% nesting habitat, and from 73% foraging habitat to 57% foraging habitat. Since there have been no surveys in the project area, or any Forest Plan monitoring on Pileated Woodpecker habitat use, there is no actual documentation that 73% of the project area is foraging habitat for the Pileated Woodpecker. Nor is the impact of reducing both nesting and foraging habitat known, since the agency has never validated that their habitat estimates represent on-the-ground conditions. Without actual surveys, any claims of habitat levels are arbitrary. And as per being an MIS, the almost complete lack of old growth within this 36 square miles of habitat would seem to indicate that the North Seeley project area does not in fat have abundant Pileated Woodpecker habitat. The agency failed to make any connection between the stated levels of habitat and the lack of old growth in this landscape for this old growth MIS. These conflicting claims were never addressed. Given that the Pileated Woodpecker uses snags with a 20 inch dbh or greater, and that it takes 120 years to develop snags of this size, the agency estimates that only 10% of the project area has snags of this size. This is likely because past logging has included 7,893 acres of clearcuts, and 7,296 acres of thinning since the 1950s, or 75 years ago. As such, only about 10% of the project area apparently has larger snag habitat, which would be stands over 100 years in age as per the wildlife report. This existing adverse impact is never addressed in the snag wildlife report.	Please refer to the wildlife specialist report for details regarding pileated woodpecker and the habitat model used to analyze habitat within the project area. While pileated woodpecker is a management indicator species for old growth, it uses a variety of habitat types.
171	14-NEC	Wildlife	Pileated WP	Are the 20-25% level of old growth recommended for forest songbirds and the Pileated Woodpecker being met (Montana Partners in Flight, Bull and Holthausen 1993). Is the old growth that exists in the project area suitable for the MIS Pileated Woodpecker and Snowshoe Hare?	Pileated woodpecker and snowshoe hare habitat in old growth was not evaluated separately from other suitable habitat. Please refer to the wildlife specialist report pileated woodpecker section and the terrestrial biological assessment lynx section for suitable habitat discussion.
175	14-NEC	Wildlife	Pileated WP	Also, is the current condition of old growth in the project area suitable for the Pileated Woodpecker, who selects old growth with relatively dense, multi-storied canopies (USDA 1990; USDA 1997).	Pileated woodpecker habitat in old growth was not evaluated separately from other suitable habitat in the project area. Please refer to the wildlife specialist report pileated woodpecker section for suitable habitat analysis.
4	3-Friede	Wildlife	Roadkill	Road kill is in its self as another subject that needs to be addressed and a open canopy allowes the wildlife to be see alot sooner. Before I retired my crew and I would remove 2 to 300 wild life carcasses from this roadway a year. I personally witnessed both Black and Grizzly bears feeding on road kill with motorist slowing and stopping to watch.	Refer to response to comment #39.

Comment #	Commenter Party/ Individual	Topic	Sub-Topic/Sub-Resource Area	Comment	Forest Service Response
190	14-NEC	Wildlife	Surveys	There have been no significant levels of wildlife surveys done for this proposed project. It is clear that wildlife surveys are not a priority for management by this agency. The massive planning for vegetation treatments and road management has in turn required massive expenditures in agency planning. Without a similar effort for planning for wildlife, the agency cannot meet the requirements of the NEPA to provide the public baseline information for a project, provide the public information how project designs addressed wildlife survey results, or how these mitigation measures have worked in other agency projects (NEPA requires mitigation measures to be effective). We contend that the agency is required by the NEPA and the NFMA to "balance" planning efforts for timber production with wildlife protection. The huge imbalance of the planning effort for the North Selway project between timber production and wildlife management clearly fails to meet these requirements.	Multiple wildlife surveys were completed for this project, primarily lynx habitat suitability/model comparisions, goshawk surveys, general wildlife habitat assessments concurrently, and grizzly gate/barrier monitoring. Numerous scientifically viable species-specific habitat models are available to use for wildlife analysis (see wildlife specialist report).
186	14-NEC	Wildlife	wolverine	There was no analysis in the North Seeley project assessment as to how clearcuts will affect local climatic conditions for wildlife, including the wolverine. Knoss (2016) notes that temperatures in clearcuts may be 18 degrees higher than surrounding forests. Lawrence et al. (2022) noted that due to "vegetation breeze," temperatures in landscapes tend to equalize, with cooler, more moist air within forests being sucked out into the dry hot air of clearcuts, thereby reducing what cool forest habitat exists for wildlife, such as the wolverine. This species is known to be sensitive to heat stress (Copeland et al. 2010). The increased temperatures that will be created within clearcuts from the North Seeley project will be exacerbated by the heating impacts of all the other forest thinning activities. It is well recognized that forests promote cooling (Milman 2024), a cooling effect that will be reduced as forest densities are reduced, allowing more direct sunlight and more wind within these stands. Overall, the clearcutting will exacerbate existing temperature increases due to climate change due to forest removal.	No vegetation treatments occur within wolverine primary or maternal habitat. Treatments would only occur within dispersal habitat. Therefore the potential cooling of forests near regeneration treatments would have limited impacts on wolverine.
200	14-NEC	Wildlife	wolverine	The open road density in the North Seeley project area exceeds recommendations for the wolverine. The Forest Service recommended in 1992 that open road densities in wolverine habitat should be one mile or less. This recommendation has been supported by research. Scrafford et al. (2018) noted that optimal habitat for robust populations of wolverine have an open road density of a mile or less. The current condition for wolverine in the North Seeley Project area is already significantly adverse. This will continue through the 20 year life of this project, as open road densities will not ever be reduced to levels recommended for the wolverine, or for that matter, the grizzly bear of one mile per section (Proctor et al. 2019).	There are 154 miles of road to be decommissioned as part of this project, thereby reducing road density.

APPENDIX E. Terms and Conditions of the Biological Opinion for Grizzly Bear

(USFWS, September 12, 2023)

Reasonable and Prudent Measures

Biological opinions provide reasonable and prudent measures that are expected to reduce the amount of incidental take. Reasonable and prudent measures are those measures necessary and appropriate to minimize incidental take resulting from proposed actions. Reasonable and prudent measures are nondiscretionary and must be implemented by the agency in order for the exemption in section 7(o)(2) to apply. The FWS believes that the Forest Plan reduces the potential for and minimizes the effect of incidental take of grizzly bears. By managing for grizzly bears within the NCDE and CYE recovery zones and NCDE zone 1, including the Ninemile DCA (following standards in the NCDE grizzly bear amendment and CYE access management direction), the amount of incidental take of grizzly bears will be reduced. The following reasonable and prudent measures are appropriate to further minimize the impacts of incidental take of grizzly bears.

1. Reduce the potential for displacement of grizzly bears related to motorized access.

Terms and Conditions

In order to be exempt from the prohibitions of section 9 of the Act, the LNF must comply with the following terms and conditions that implement the reasonable and prudent measures described above and outline reporting and monitoring requirements. These terms and conditions are non-discretionary:

To implement Reasonable and Prudent Measure #1:

1. Within the Swan subunit in the NCDE, maintain OMRD during the spring (from April 1 through June 30) at 22 percent throughout the life of the Forest Plan. This is accomplished via the gated seasonal closure on the northern section of National Forest Service Route 4370. The closure extends from the junction with Highway 83 in T19NR16WS36 to the Clearwater Lake Trailhead in T19NR15WS19.

2. When implementing future road restriction decisions to restrict motorized access, the Forest shall use devices or methods recognized by the Interagency Grizzly Bear Committee as effective closure devices and methods[34].

3. The Forest shall update the secure habitat data within the GBAUs outside of the recovery zones as they obtain new information and/or develop site-specific projects.

4. The duration for those actions associated with site-specific projects that result in temporary changes in the effectiveness of secure habitat within GBAUs outside of the recovery zones associated with site-specific temporary route construction and use, and/or temporary use of restricted routes shall be limited to the following: within NCDE zone 1

[34] Interagency Grizzly Bear Committee (IGBC). 1998. Revised interagency grizzly bear taskforce report: grizzly bear/motorized access management. U.S.D.A. Forest Service, Missoula, Montana 6pp

and the Ninemile DCA, new temporary routes that affect secure habitat shall not be on the landscape for more than 5 years from the start of construction and the temporary use of restricted routes that affect secure habitat should occur for more than 5 years; and within the area outside of NCDE zone 1 and the Ninemile DCA, new temporary routes that affect secure habitat shall not be on the landscape for more than 10 years from the start of construction and the temporary use of restricted routes that affect secure habitat should not occur for more than 10 years.

FS Agreement No. 2023-CS-11011600-009

Cooperator Agreement No. _____

NON FUNDED CHALLENGE COST SHARE AGREEMENT
Between The
SCENIC MONTANA TRAILS
And The
USDA, FOREST SERVICE
LOLO NATIONAL FOREST

This NON FUNDED CHALLENGE COST SHARE AGREEMENT is hereby entered into by and between the Scenic Montana Trails , hereinafter referred to as "SMT," and the United States Department of Agriculture (USDA), Forest Service, Lolo National Forest, hereinafter referred to as the "U.S. Forest Service," under the authority: Department of Interior and Related Agencies Appropriation Act of 1992, Pub. L. 102-154.

Background: The U.S. Forest Service and the Scenic Montana Trails (with the Driftriders) have partnered under a Challenge Cost Share Agreement to maintain and operate groomed snowmobile trails on the Seeley Lake Ranger District, Lolo National Forest. The Driftriders have incorporated with the newly formed Scenic Montana Trails Organization to advocate for motorized trails in the Seeley Swan area and seek to continue and expand upon volunteer work advocating motorized trails and access.

The Driftriders are the winter arm of Scenic Montana Trails. The Driftriders are no longer an individual organization. The Driftriders are an incorporated sub-division of Scenic Montana Trails and are part of the new SMT organization. SMT will continue to receive financial support from Montana Fish, Wildlife and Parks (FWP) grants contributing to the partnership. The parties wish to continue this valuable public service through execution of this agreement.

Title: Snow Machine Grooming

I. PURPOSE:

This agreement formally documents the cooperation between the parties for continued grooming operations on the 371-mile snow trail system across the Seeley Lake Ranger District. Multiple segments of the snow trail system cross through designated State Lands. All parties will act in accordance with the following provisions and the hereby incorporated Operating and Financial Plan and map Exhibits A and B.

II. STATEMENT OF MUTUAL BENEFIT AND INTERESTS:

Scenic Montana Trails has interest in maintaining a groomed snowmobile trail system. SMT relies upon Montana Fish Wildlife and Parks Recreational Trails funding in concert with public donations to provide extensive grooming for area trails.

The U.S. Forest Service is a land management agency dedicated to managing National Forest System (NFS) Lands for a variety of uses and activities - including winter motorized recreation. The U.S. Forest Service has interest in cooperating with partners to meet land management goals and provide recreational opportunities for the use and enjoyment of National Forest System lands.

In consideration of the above premises, the parties agree as follows:

III. SMT SHALL:

A. LEGAL AUTHORITY. SMT shall have the legal authority to enter into this agreement, and the institutional, managerial, and financial capability to ensure proper planning, management, and completion of the project, which includes funds sufficient to pay the nonfederal share of project costs, when applicable.

B. Perform in accordance with the herby incorporated Financial and Operating Plan – Exhibit A.

IV. THE U.S. FOREST SERVICE SHALL:

A. Perform in accordance with the hereby incorporated Financial and Operating Plan-Exhibit A.

V. IT IS MUTUALLY UNDERSTOOD AND AGREED BY AND BETWEEN THE PARTIES THAT:

A. PRINCIPAL CONTACTS. Individuals listed below are authorized to act in their respective areas for matters related to this agreement.

Principal Cooperator Contacts:

Cooperator Program Contact	Cooperator Administrative Contact
Bruce Friede P.O. Box 174 Seeley Lake, MT, 59868 406-361-1143 info@scenicmontanatrails.org	Mike Kent P.O. Box 174 Seeley Lake, MT, 59868 406-677-2833 info@scenicmontanatrails.org

Principal U.S. Forest Service Contacts:

U.S. Forest Service Program Manager Contact	U.S. Forest Service Administrative Contact
Matthew Walter 3583 Montana Highway 83 Seeley Lake MT 59868 406-677-3924 matthew.walter@usda.gov	Anna Stebritz Grants Management Trainee 24 Fort Missoula Rd Missoula, MT 59804 anna.stebritz@usda.gov

B. ASSURANCE REGARDING FELONY CONVICTION OR TAX DELINQUENT STATUS FOR CORPORATE ENTITIES. This agreement is subject to the provisions contained in the Department of Interior, Environment, and Related Agencies Appropriations Act, 2012, P.L. No. 112-74, Division E, Section 433 and 434 as continued in the Consolidated Appropriations Act, 2016, P.L. No. 114-113, Division E, Title VII, General Provisions Section 745 and 746 respectively regarding corporate felony convictions and corporate federal tax delinquencies. Accordingly, by entering into this agreement SMT acknowledges that it: 1) does not have a tax delinquency, meaning that it is not subject to any unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability, and (2) has not been convicted (or had an officer or agent acting on its behalf convicted) of a felony criminal violation under any Federal law within 24 months preceding the agreement, unless a suspending and debarring official of the United States Department of Agriculture has considered suspension or debarment is not necessary to protect the interests of the Government. If SMT fails to comply with these provisions, the U.S. Forest Service will annul this agreement and may recover any funds SMT has expended in violation of sections 433 and 434.

C. NOTICES. Any communications affecting the operations covered by this agreement given by the U.S. Forest Service or SMT are sufficient only if in writing and delivered in person, mailed, or transmitted electronically by e-mail or fax, as follows:

To the U.S. Forest Service Program Manager, at the address specified in the agreement.

To SMT, at the address shown in the agreement or such other address designated within the agreement.

Notices are effective when delivered in accordance with this provision, or on the effective date of the notice, whichever is later.

D. PARTICIPATION IN SIMILAR ACTIVITIES. This agreement in no way restricts the U.S. Forest Service or SMT from participating in similar activities with other public or private agencies, organizations, and individuals.

E. ENDORSEMENT. Any of SMT's contributions made under this agreement do not by direct reference or implication convey U.S. Forest Service endorsement of SMT 's products or activities.

F. USE OF U.S. FOREST SERVICE INSIGNIA. In order for SMT to use the U.S. Forest Service insignia on any published media, such as a Web page, printed publication, or audiovisual production, permission must be granted from the U.S. Forest Service's Office of Communications (Washington Office). A written request will be submitted by the U.S. Forest Service "Region 1, Lolo National Forest, Seeley Lake Ranger District" to the Office of Communications Assistant Director, Visual Information, and Publishing Services prior to use of the insignia. The U.S. Forest Service "Region 1, Lolo National Forest, Seeley Lake Ranger District" will notify the SMT when permission is granted.

G. NON-FEDERAL STATUS FOR COOPERATOR PARTICIPANTS. SMT agree(s) that any of SMT's employees, volunteers, and program participants shall not be deemed to be Federal employees for any purposes including Chapter 171 of Title 28, United States Code (Federal Tort Claims Act) and Chapter 81 of Title 5, United States Code (OWCP), as SMT has hereby willingly agreed to assume these responsibilities.

Further, SMT shall provide any necessary training to SMT's employees, volunteers, and program participants to ensure that such personnel are capable of performing tasks to be completed. SMT shall also supervise and direct the work of its employees, volunteers, and participants performing under this agreement.

H. MEMBERS OF U.S. CONGRESS. Pursuant to 41 U.S.C. 22, no member of, or delegate to, Congress shall be admitted to any share or part of this agreement, or benefits that may arise therefrom, either directly or indirectly.

I. NONDISCRIMINATION. The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or a part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, and so forth.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

J. ELIGIBLE WORKERS. SMT shall ensure that all employees complete the I-9 form to certify that they are eligible for lawful employment under the Immigration and Nationality Act (8 USC 1324a). SMT shall comply with regulations regarding certification and retention of the completed forms. These requirements also apply to any contract awarded under this agreement.

K. SYSTEM FOR AWARD MANAGEMENT REGISTRATION REQUIREMENT (SAM). SMT shall maintain current information in the System for Award Management (SAM). This requires review and update to the information at least annually after the initial registration, and more frequently if required by changes in information or agreement term(s). For purposes of this agreement, System for Award Management (SAM) means the Federal repository into which an entity must provide information required for the conduct of business as a Cooperative. Additional information about registration procedures may be found at the SAM Internet site at www.sam.gov.

L. AGREEMENT CLOSEOUT. Within 120 days after expiration or notice of termination the parties shall close out the agreement.

Within a maximum of 120 days following the date of expiration or termination of this agreement, all reports required by the terms of the agreement must be submitted to the U.S. Forest Service by SMT.

M. PROGRAM MONITORING AND PROGRAM PERFORMANCE REPORTS. The parties to this agreement shall monitor the performance of the agreement activities to ensure that performance goals are being achieved.

Performance reports must contain information on the following:

- A comparison of actual accomplishments to the goals established for the period. Wherever the output of the project can be readily expressed in numbers, a computation of the cost per unit of output, if applicable.

- Reason(s) for delay if established goals were not met.

- Additional pertinent information

SMT shall submit annual performance reports to the U.S. Forest Service Program Manager. These reports are due 90 days after the reporting period. The final performance report must be submitted no later than 120 days from the expiration date of the agreement.

N. RETENTION AND ACCESS REQUIREMENTS FOR RECORDS. SMT shall retain all records pertinent to this agreement for a period of no less than 3 years from the expiration or termination date. As used in this provision, records includes books,

documents, accounting procedures and practice, and other data, regardless of the type or format. SMT shall provide access and the right to examine all records related to this agreement to the U.S. Forest Service Inspector General, or Comptroller General or their authorized representative. The rights of access in this section must not be limited to the required retention period but must last as long as the records are kept.

If any litigation, claim, negotiation, audit, or other action involving the records has been started before the end of the 3-year period, the records must be kept until all issues are resolved, or until the end of the regular 3-year period, whichever is later.

O. FREEDOM OF INFORMATION ACT (FOIA). Public access to agreement records must not be limited, except when such records must be kept confidential and would have been exempted from disclosure pursuant to Freedom of Information regulations (5 U.S.C. 552). Requests for research data are subject to 2 CFR 215.36.

Public access to culturally sensitive data and information of Federally recognized Tribes may also be explicitly limited by P.L. 110-234, Title VIII Subtitle B §8106 (2009 Farm Bill).

P. TEXT MESSAGING WHILE DRIVING. In accordance with Executive Order (EO) 13513, "Federal Leadership on Reducing Text Messaging While Driving," any and all text messaging by Federal employees is banned: a) while driving a Government owned vehicle (GOV) or driving a privately owned vehicle (POV) while on official Government business; or b) using any electronic equipment supplied by the Government when driving any vehicle at any time. All Cooperators, their Employees, Volunteers, and Contractors are encouraged to adopt and enforce policies that ban text messaging when driving company owned, leased or rented vehicles, POVs or GOVs when driving while on official Government business or when performing any work for or on behalf of the Government.

Q. PUBLIC NOTICES. It is the U.S. Forest Service's policy to inform the public as fully as possible of its programs and activities. SMT is/are encouraged to give public notice of the receipt of this agreement and, from time to time, to announce progress and accomplishments. Press releases or other public notices should include a statement substantially as follows:

"Scenic Montana Trails" of the U.S. Forest Service, Department of Agriculture"

SMT may call on the U.S. Forest Service's Office of Communication for advice regarding public notices. SMT is/are requested to provide copies of notices or announcements to the U.S. Forest Service Program Manager and to U.S. Forest Service's Office of Communications as far in advance of release as possible.

R. U.S. FOREST SERVICE ACKNOWLEDGED IN PUBLICATIONS, AUDIOVISUALS AND ELECTRONIC MEDIA. SMT shall acknowledge U.S.

Forest Service support in any publications, audiovisuals, and electronic media developed as a result of this agreement.

S. NONDISCRIMINATION STATEMENT – PRINTED, ELECTRONIC, OR AUDIOVISUAL MATERIAL. SMT shall include the following statement, in full, in any printed, audiovisual material, or electronic media for public distribution developed or printed with any Federal funding.

> ***"In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. (Not all prohibited bases apply to all programs.)***
>
> To file a complaint alleging discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410 or call toll free voice (866) 632-9992, TDD (800)877-8339, or voice relay (866) 377-8642. USDA is an equal opportunity provider and employer."

If the material is too small to permit the full statement to be included, the material must, at minimum, include the following statement, in print size no smaller than the text:

"This institution is an equal opportunity provider."

T. REMEDIES FOR COMPLIANCE RELATED ISSUES. If SMT materially fail(s) to comply with any term of the agreement, whether stated in a Federal statute or regulation, an assurance, or the agreement, the U.S. Forest Service may wholly or partly suspend or terminate the current agreement.

U. TERMINATION BY MUTUAL AGREEMENT. This agreement may be terminated, in whole or part, as follows:

1. When the U.S. Forest Service and SMT agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated.

2. By 30 days written notification by SMT to the U.S. Forest Service setting forth the reasons for termination, effective date, and in the case of partial termination, the portion to be terminated. If the U.S. Forest Service decides that the remaining portion of the agreement does not accomplish the purpose for which the award/agreement was made, the U.S. Forest Service may terminate the award upon 30 days written notice in its entirety.

V. ALTERNATE DISPUTE RESOLUTION – PARTNERSHIP AGREEMENT. In the event of any issue of controversy under this agreement, the parties may pursue Alternate Dispute Resolution procedures to voluntarily resolve those issues. These procedures may include, but are not limited to conciliation, facilitation, mediation, and fact finding.

W. DEBARMENT AND SUSPENSION. SMT shall immediately inform the U.S. Forest Service if they or any of their principals are presently excluded, debarred, or suspended from entering into covered transactions with the Federal Government according to the terms of 2 CFR Part 180. Additionally, should SMT or any of their principals receive a transmittal letter or other official Federal notice of debarment or suspension, then they shall notify the U.S. Forest Service without undue delay. This applies whether the exclusion, debarment, or suspension is voluntary or involuntary.

X. COPYRIGHTING. SMT is/are granted sole and exclusive right to copyright any publications developed as a result of this agreement. This includes the right to publish and vend throughout the world in any language and in all media and forms, in whole or in part, for the full term of copyright and all renewals thereof in accordance with this agreement.

No original text or graphics produced and submitted by the U.S. Forest Service must be copyrighted. The U.S. Forest Service reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use, and to authorize others to use the work for Federal Government purposes. This right must be transferred to any sub-agreements or subcontracts.

This provision includes:

1. The copyright in any work developed by SMT under this agreement.
2. Any right of copyright to which SMT purchase(s) ownership with any Federal contributions.

Y. PUBLICATION SALE. SMT may sell any publication developed as a result of this agreement. The publication may be sold at fair market value, which is initially defined in this agreement to cover the costs of development, production, marketing, and distribution. After the costs of development and production have been recovered, fair market value is defined in this agreement to cover the costs of marketing, printing, and distribution only. Fair market value must exclude any in-kind or Federal Government contributions from the total costs of the project.

Z. TRAINING, EVALUATION, AND CERTIFICATION OF SAWYERS. Any of the cooperator's employees, and any participants and volunteers engaged on behalf of the cooperator and U.S. Forest Service, who will use chain saws or crosscut saws on National Forest System lands to conduct the program of work contained in this agreement must be trained, evaluated, and certified in accordance with U.S. Forest Service Manual 2358 and U.S. Forest Service Handbook 6709.11, section 22.48b. The cooperator is responsible for providing this training, evaluation, and certification, unless the U.S. Forest Service and the cooperator determine it is not in the best interest of the partnership. In these circumstances, the U.S. Forest Service, upon request and based on availability of Agency funding and personnel, may assist with developing and conducting training, evaluation, and certification of the cooperator's employees, and any volunteers and participants engaged on behalf of the cooperator

and the U.S. Forest Service, who will use chain saws or cross-cut saws on National Forest System lands.

AA. MODIFICATIONS. Modifications within the scope of this agreement must be made by mutual consent of the parties, by the issuance of a written modification signed and dated by all properly authorized, signatory officials, prior to any changes being performed. Requests for modification should be made, in writing, at least 30 days prior to implementation of the requested change.

BB. COMMENCEMENT/EXPIRATION DATE. This agreement is executed as of the date of the last signature and is effective through 9/30/2027at which time it will expire. The expiration date is the final date for completion of all work activities under this agreement.

CC. AUTHORIZED REPRESENTATIVES. By signature below, each party certifies that the individuals listed in this document as representatives of the individual parties are authorized to act in their respective areas for matters related to this agreement. In witness whereof, the parties hereto have executed this agreement as of the last date written below.

Bruce Friede 1-27-23

BRUCE FRIEDE, Vice President - Grooming Operations Date
Scenic Montana Trails

CAROLYN UPTON, Forest Supervisor Date
U.S. Forest Service, Lolo National Forest

The authority and format of this agreement have been reviewed and approved for signature.

EMMA SPURLOCK Digitally signed by EMMA SPURLOCK Date: 2023.01.27 09:37:21 -07'00'

EMMA SPURLOCK
U.S. Forest Service, Grants Management Specialist Date

Burden Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0217. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call toll free (866) 632-9992 (voice). TDD users can contact USDA through local relay or the Federal relay at (800) 877-8339 (TDD) or (866) 377-8642 (relay voice). USDA is an equal opportunity provider and employer.

EXHIBIT A

FINANCIAL AND OPERATING PLAN

Operating Plan

This Financial and Operating Plan is hereby made and entered into by and between the Scenic Montana Trails (SMT), and the U.S. Forest Service, Lolo National Forest (U.S. Forest Service) as specified under the provisions of this Challenge Cost Share Agreement #23-CS-11011600-009.

The Seeley Lake Ranger District has four basic types of snowmobile riding opportunities.

1. Trails signed and marked with orange diamonds. (Groomed)
2. Unmarked trails.
3. Mixed-use trails.
4. Off trail riding.

This Operating and Financial Plan is a continuing plan for the length of the agreement. A new Operating and Financial Plan does not need to be developed each year unless there are significant changes in the document such as partner responsibilities, the number of miles of groomed trails or the financial plan.

I. The Scenic Montana Trails (SMT) Shall:

A. Install Groomed Trail number/guide signs provided by Montana Fish, Wildlife and Parks at strategic points, including intersections, along the trail system. Orange diamond trail markers will be installed and maintained by SMT.

B. Install stop signs at each intersection of a designated snowmobile trail and plowed county and National Forest System roads.

C. As of April 1, remove the signs and the trails will then revert to open roads (adhering to the Motor Vehicle Use Map (Lolo National Forest, Seeley Lake Ranger District).

D. In addition to the gates listed in **Table 2**, coordinate with the following entities for the management of these gates. There are gates on The Nature Conservancy, Montana Fish, Wildlife and Parks, and BCCA roads that are not under U.S. Forest Service jurisdiction.

E. Annually submit an application to the Montana Fish, Wildlife and Parks for the Snowmobile Grooming Program Grant.

F. Voluntarily seek, accept, and expend funds from other sources to support the trail system.

G. Provide any necessary and required training to the SMT volunteers and ensure, that such personnel, are capable of performing tasks to be completed.

EXHIBIT A

H. Install trail use counters on the snowmobile trail system and provide trail use information to the U.S. Forest Service as requested.

I. Install, maintain, remove, and store trail signs in accordance with the U.S. Forest Service sign plan. See Tables 1 and 2.

J. Plow the trailhead parking facilities as needed and perform snowmobile grooming in accordance with appropriate Montana state standards and the U.S. Forest Service Handbook 2309.18, Trails Management Handbook.

K. Be responsible for operational maintenance and grooming of the snowmobile trail system. After December 1 begin trail grooming when there is adequate snow cover. Provide trail grooming once a week, more or less, depending upon the suitability of snow conditions and the availability of snowmobile grooming funds. Groom approved trails, as identified on Exhibit B.

L. Remove any trees or obstacles leaning into or across the groomed trail. Additional limbing of trees encroaching on the trail corridor may be necessary as the snowpack increases over the course of the season. Tree limbs will be cut flush with the trunk of the tree. SMT will notify the U.S. Forest Service when trails need brushing, so that the work may be included in the summer road brushing contract. SMT will assist the U.S. Forest Service with off-season trail maintenance, as mutually agreed to, to keep snowmobile trails open.

M. Maintain un-groomed trails identified in Exhibit B in accordance with appropriate Montana state standards and the U.S. Forest Service Handbook 2309.18, Trails Management Handbook.

N. At the end of the season, notify the U.S. Forest Service of any gate maintenance, hazards, and/or signing requirements. SMT will inventory trail grooming signs (reassurance blazers, turn arrows and warning signs) on hand and include a replacement order with the grant application to Montana Fish, Wildlife and Parks.

O. Prepare an annual report of work accomplishments and progress, including future project proposals and trends. This report will satisfy the reporting requirements identified in Provision M. (The attached Optional Project Performance Report may be used as a template or guidance on fulfilling the reporting requirements).

II. The U.S. Forest Service Shall:

A. Install Groomed Trailhead signs will be provided to the Scenic Montana Trails (SMT) by Montana Fish, Wildlife and Parks. A copy of the Seeley Lake Area Snowmobile Trails map will also be installed by the U.S. Forest Service at each trailhead.

EXHIBIT A

B. Install and maintain stop signs at the intersection of designated snowmobile trails and state highways. Temporary signage for administrative closures will be prepared and installed by the U.S. Forest Service as the needs arise.

C. Maintain and flip warning flip signs biannually for Monture Creek Road segment M.P. 5.10 to M.P. 7.01. Mixed highway vehicle and snowmobile use is allowed on this segment when signs are posted.

D. Maintain and flip warning flip signs biannually for Lower Cottonwood #9976 M.P. 0.00 to 1.06. Mixed residential highway vehicle use and snowmobiles use is permitted on this segment, when signs are posted.

E. Unmarked trails -The gates on these routes will generally be closed but, may be opened on a case-by-case basis by the U.S. Forest Service.

F. Allow use of designated roads and trails in accordance with the Over Snow Motor Vehicle Use Map for the Seeley Lake Ranger District, Lolo National Forest and as specifically identified on the Seeley Lake Area Snowmobile Trails map, Exhibit B, for the snowmobile grooming program.

G. Develop a sign plan for the snowmobile trails and trailheads for the groomed and ungroomed trails (See Exhibit B). The sign plan will comply with sign warrants and EM-7100-15, Standards for Forest Service Signs and Posters.

H. Furnish U.S. Forest Service required signs not provided by Montana Fish, Wildlife and Parks grant funding.

I. At the U.S. Forest Service's discretion, perform off-season maintenance activities on designated trails. Maintenance may include brushing, erosion control, etc. and will be in accordance with the guidelines in the U.S. Forest Service Handbook 2309.18, Trails Management Handbook.

J. Monitor the snowmobile grooming activities for compliance with grooming guidelines, performance standards and safety in accordance with the U.S. Forest Service Handbook 2309.18, Trails Management Handbook.

K. Notify SMT of any U.S. Forest Service activities such as winter logging or haul traffic that may affect the operation and maintenance schedule of the snowmobile grooming program.

III. It is mutually agreed and understood by and between the parties that the parties shall:

EXHIBIT A

A. All temporary trail signs shall be removed at the end of the season in coordination between the U.S. Forest Service and SMT.

B. Signs should be mounted at least 40 inches (1 m) above the average maximum snow level at the bottom of the sign. Signs placed more than 8.5 feet (2.6 m) above the snow level may not be visible, especially at night. This applies specifically to road signs (blazes, arrows, stop signs, etc).

C. Closures – All gates that a groomed route passes through on National Forest System road/trails will be locked open at the beginning of snowmobile season, no earlier than December 1. Specified gates on ungroomed routes will be locked open at the beginning of the season, no earlier than December 1. See **Table 2** for gate locations, dates, and division of responsibilities.

D. Problems have occurred with wheeled vehicles driving on groomed snowmobile trails. Eleven large signs were purchased by the Forest Service and installed along the trail system. The signs have symbols of a snowmobile, ATV with slash, and jeep with slash and read "CLOSED TO ALL MOTORIZED VEHICLES EXCEPT SNOWMOBILES". The Over Snow Motor Vehicle Use Map for the Seeley Lake Ranger District shall be the deciding document defining allowed use for motorized snow trails. These signs are to be installed or flipped open, each year at the locations specified in **Table 1**.

E. All other groomed trails that intersect with a plowed road will be signed with a 12"x 18" sign indicating no wheeled traffic and a STOP sign. These signs are furnished by the U.S. Forest Service and shall be installed each year. See **Table 1** for division of responsibilities.

F. U.S. Forest Service will maintain the flip warning signs, but inspected and flipped by SMT for West Fork Clearwater #550 segment 0.00 to 0.76. Mixed residential highway vehicle use and snowmobiles use is permitted on this segment, when signs are posted.

G. U.S. Forest Service will maintain the flip warning signs, but inspected and flipped by SMT for Westside Bypass #2190 M.P. 0.00 to 1.14. Mixed residential highway vehicle use and snowmobiles use is permitted on this segment, when signs are posted.

H. All parties will make themselves available as needed, to discuss the conditions covered by this agreement, and to coordinate any activities pursuant to this agreement including, but not limited to, the joint development of the Financial and Operating Plan. At a minimum the two parties will meet yearly by November 1.

I. It is the intent of this agreement that when/if needed the parties will modify this agreement with an updated Financial and Operating Plan, attached as Exhibit A. There is no obligation for any party to

provide funds or work other than that which has been mutually agreed to in the approved Financial and Operating Plan. The Financial and Operating Plan shall:

- Contain specific language stating that the Financial and Operating Plan is being added to this agreement thereby subjecting it to the terms of this agreement.
- Be reviewed or updated by December 1 of each year.
- Include the names of SMT officers and Grooming Chairman.
- Include a snowmobile trail map showing designated routes.
- Be reviewed and approved by a U.S. Forest Service Grants and Agreements Specialist.
- Be mutually agreed to, in writing, by all parties.

J. The latest revision of the mutually approved Financial and Operating Plan will be incorporated into this agreement through formal modification as defined in Provision V.AA of this agreement.

K. The latest revision of the mutually approved snowmobile trail map will be incorporated into this agreement without formal modification.

L. Prior to grooming, coordinate gate closing/locking on National Forest System lands and with adjacent landowners. Ensure all affected gates are properly signed indicating a seasonal change in travel management. Ensure all hazards are properly signed. Coordinate on opening locked gates within the interior of the trail system.

M. Agree to responsibility for maintenance and repairs of the gates damaged during the course of the snowmobile grooming season.

N. Coordinate the installation, maintenance, and removal of all snowmobile trail signs. The snowmobile trail sign system will be in place by December 1 annually and remain in place through March 31when the trails will become roads. Replace signs and posts as needed and raise signs on the posts as the snow depth increases through the course of the season.

O. Improvements such as warming huts, groomer sheds, and kiosks are not to be authorized under this agreement. A separate application/authorization must be completed for these improvements. Such authorization will address ownership, tenure, and maintenance and operation responsibilities among other items.

P. Agree the following people will serve as **Scenic Montana Trails Officers**: Mike Kent (President), Bruce Friede (Vice President-Grooming Operations), Tom Stanley (Secretary), Ron Hundtofte (Treasurer), Jeff McClain (Media/Membership).

EXHIBIT A

Q. If the SMT Officers and/or Grooming Chairman changes, the U.S. Forest Service will be notified and noted in the agreement file.

Table 1: Snowmobile Trail Signs/Responsibility

Map #	Trail Number	Intersecting Road	"Closed to all traffic except Snowmobiles" 12 X 18	Responsibility	Flip Sign	Responsibility	Stop Sign	Responsibility	Comments
1	38	Hwy 83	Install Temporary	Driftriders			Permanent	Forest Service	
2	39	Hwy 83	Install Temporary	Driftriders			Permanent	Forest Service	
3	16 (E. of Hwy 83)	Hwy 83	Install Temporary	Driftriders			Permanent	Forest Service	
4	16	Hwy 83			Share the Road	Driftriders	Permanent	Forest Service	
4	16	Hwy 83			Residents Only	Driftriders			
5	16	Inez Homeowners Road			Snowmobiles Only	Driftriders	Install Temporary	Driftriders	
5	16	Inez Homeowners Road			Share the Road	Driftriders			
6									
7	12	Hwy 83	Install Temporary	Driftriders			Permanent	Forest Service	
8	11	Hwy 83	Install Temporary	Driftriders			Permanent	Forest Service	
9	8	Fawn Cr. Road (NW Side)					Permanent	Forest Service	
10	Westside Trailhead	Fawn Cr. Road (E. Side)					Install Temporary	Driftriders	
11	Westside Trailhead	Fawn Cr. Road (E. Side)							Driftriders Install "No Parking" Sign
12	8	Fawn Cr. Jct. w/ Homeowners' Road			Snowmobiles Only	Driftriders			
13	Westside Trailhead	Fawn Cr. Road					Permanent	Forest Service	X2 on both sides of road
14	23	Boyscout Road		Driftriders			Install Temporary	Driftriders	X2 on both sides of road
15	24	Boyscout Road		Driftriders			Install Temporary	Driftriders	X2 on both sides of road
16	3	Hwy 83			Share the Road	Driftriders	Permanent	Forest Service	
17	3	Water Plant Road			Snowmobiles Only	Driftriders			
17	3	Water Plant Road			Share the Road	Driftriders			
18	42	Eagle Point Homeowner's Road			Share the Road	Driftriders			
18	42	Eagle Point Homeowner's Road			Snowmobiles Only	Driftriders			
19	42	Snowmass Road			Share the Road	Driftriders			
19	42	Snowmass Road			Residents Only	Driftriders			
20	FS RD 349 (Placid)	Shining Shirt Road			Snowmobiles Only	Driftriders			
21	Seeley Cr. Trailhead	Where trail enters parking area					Install Temporary	Driftriders	
22	1	at 4 way stop (FS RD 4353 & FS RD 477)					Install Temporary X3	Driftriders	
22	1	at 4 way stop (FS RD 4353 & FS RD 477)					Permanent	Forest Service	
23	1	Where trail leaves parking area	Install Temporary	Driftriders					
24	3	Cottonwood Lakes Road			Snowmobiles Only	Driftriders			
25									
26									
27	31	Hwy 83 (by Horseshoe Gravel Pit)			Snowmobiles Only	Forest Service			
28	13	At Cozy Corner			Share the Road	Forest Service			
28	13	At Cozy Corner			Residents Only	Forest Service			
29	13	Forest Boundary (N. of Rich Ranch)			Snowmobiles Only	Forest Service			
29	13	Forest Boundary (N. of Rich Ranch)			Share the Road	Forest Service			
30	1A	McCabe Rd.	Install Temporary	Forest Service			Permanent	Forest Service	
31	1	Forest Boundary			Share the Road	Forest Service			
32	1	End of plowing by Shepard's			Share the Road	Forest Service			
32	1	End of plowing by Shepard's			Snowmobiles Only	Forest Service			
33	14	plowed section			Share the Road	MEC			MEC plows intermittent for substation access, installs temp Share the Road sign
33	14	plowed section			Share the Road	MEC			MEC plows intermittent for substation access, installs temp Share the Road sign

EXHIBIT A

Table 2: Snowmobile Trail Gates/Responsibility

Trail Number	Road Name/Number	Loaction	Open Date	Close Date	Party Responsible for Opening/Closing
1A	Main McCabe 5401	Sec 34, T15N, R11W	1-Dec	1-Apr	Forest Service
1A	McCabe 5401 @ 17536 Little Red Hills Upper	Sec 34, T15N, R11W	1-Dec	1-Apr	Forest Service
1A	McCabe 5401 @ 17536 Little Red Hills Lower	Sec 4, T15N, R12W	1-Dec	1-Apr	Forest Service
3	End of Tamarack Dr.	Sec 35, T16N, R14W	1-Dec	1-Apr	Driftriders
3	Entrance to Seeley Creek trailhead	Sec 35, T16N, R14W	1-Dec	1-Apr	Driftriders
3	Seeley C reek Trailhead to Cottonwood Lakes Rd.	Sec 35, T16N, R14W	1-Dec	1-Apr	Driftriders
4	Clearwater Lake Loop 4370 (near trailhead)	Sec 19, T18N, R15W	N/A	31-Mar	Driftriders
4	Clearwater Lake Loop 4370 (@ Hwy 83)	Sec 36, T18, R15W	N/A	31-Mar	Driftriders
10	Mt. Henry 5407	Sec 3, T17N, R15W	1-Dec	1-Apr	Driftriders
10	Marshall Lake 463	Sec 29, T17N, R16W	1-Dec	1-Apr	Driftriders
14	Belmont Boles 4341	Sec 29, T15N, R16W	1-Dec	1-Apr	Driftriders
FS RD 46930	Horseshoe Hills	Sec 30, T15N, R14W	1-Dec	1-Apr	Forest Service
FS RD 46942	Horseshoe Hills	Sec 19, T15N, R14W	1-Dec	1-Apr	Forest Service
FS RD 56131	Horseshoe Hills (Gate behind Scott's House)	Sec 13, T16N, R14W	1-Dec	1-Apr	Forest Service
	Horseshoe Hill Drew Creek/Double Arrow Gate	Sec 18, T16N, R14W	1-Dec	1-Apr	Forest Service
FS RD 56077	Spring Creek Rd. @ 9976 Cozy Corner	Sec 24, T15N, R13W	1-Dec	1-Apr	Forest Service
FS RD 17504	Mountain Cr. @ 477	Sec 32, T16N, R14W	1-Dec	1-Apr	Driftriders
6	Double Arrow Lookout	Sec 5 T16N, R15W	1-Dec	1-Apr	Forest Service
FS RD 5417	South Cottonwood East End Gate	Sec 11 T16N, R13W	1-Dec	1-Apr	Forest Service
FS RD 5417	South Cottonwood West End Gate	Sec 3, T16N, R13W	1-Dec	1-Apr	Forest Service

*Need to ground truth all gates in Horseshoe Hills area, Chad will do with Scott during 17/18 winter and update spreadsheet and map.

*Removed 2 gates from Grouse Creek/2nd Creek area that were in violation of OSVUM. These gate will remain closed unless OSVUM is modified.

EXHIBIT B

SNOWMOBILE MAP

The attached map displays the designated snowmobile trail system that includes trails approved for grooming, trails groomed intermittently, and ungroomed trails on the Seeley Lake Ranger District, Lolo National Forest. Below is a summary of the type of trails and miles to be groomed.

189.8 miles of groomed trails

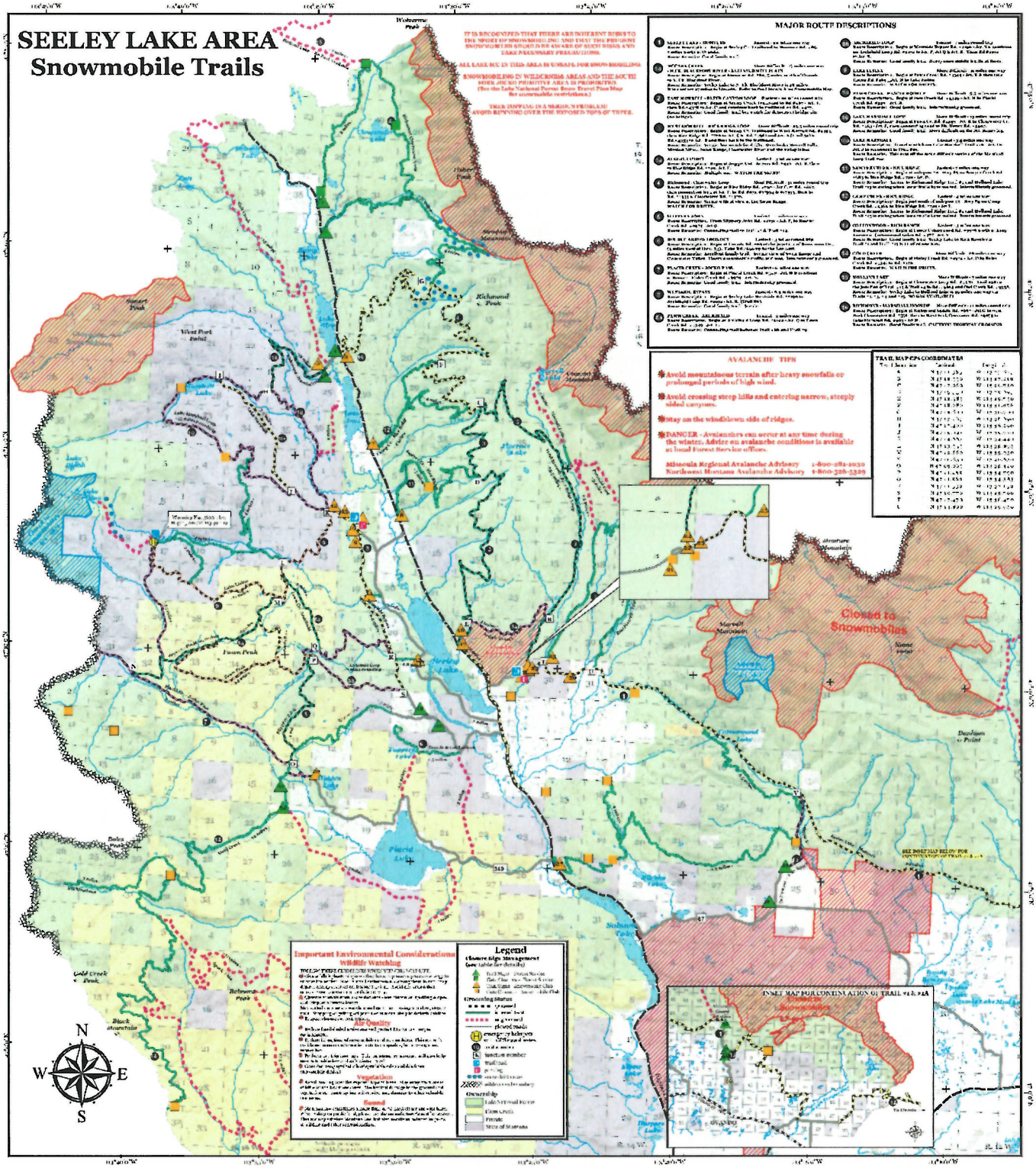
83.7 miles of intermittently groomed trails

82.6 miles of ungroomed trails

58.8 miles of plowed roads

Attach the most current copy of the snowmobile trail grooming map to this document.

EXHIBIT B


SEELEY LAKE AREA
Snowmobile Trails
MAJOR ROUTE DESCRIPTIONS
AVALANCHE TIPS
Avoid mountainous terrain after heavy snowfalls or prolonged periods of high wind.
Avoid crossing steep hills and entering narrow, steeply sided canyons.
Stay on the windblown side of ridges.
DANGER - Avalanches can occur at any time during the winter. Advice on avalanche conditions is available at local Forest Service offices.
Missoula Regional Avalanche Advisory 1-800-526-1020
Northwest Montana Avalanche Advisory 1-800-338-5320
TRAIL MAP GPS COORDINATES
Important Environmental Considerations
Wildlife Watching
Air Quality
Vegetation
Legend
Ownership
Closed to Snowmobiles
INSET MAP FOR CONTINUATION OF TRAIL #424
N
W
E
S

U.S. Forest Service

OMB 0596-0217
FS-1500-17B

Attachment: A

USFS Agreement No.: 23-CS-11011600-009
Cooperator Agreement No.:
Mod. No.:

Note: This Financial Plan may be used when:
(1) No program income is expected and
(2) The Cooperator is not giving cash to the FS and
(3) There is no other Federal funding

Agreements Financial Plan (Short Form)

Financial Plan Matrix: Note: All columns may not be used. Use depends on source and type of contribution(s).

	FOREST SERVICE CONTRIBUTIONS		COOPERATOR CONTRIBUTIONS		
	(a)	(b)	(c)	(d)	
COST ELEMENTS	Noncash	Cash to Cooperator	Noncash	In-Kind	(e) Total
Direct Costs					
Salaries/Labor	$34,000.00	$0.00	$0.00	$175,000.00	$209,000.00
Travel	$0.00	$0.00	$0.00	$0.00	$0.00
Equipment	$0.00	$0.00	$80,000.00	$100,000.00	$180,000.00
Supplies/Materials	$2,500.00	$0.00	$107,240.00	$0.00	$109,740.00
Printing	$0.00	$0.00	$0.00	$0.00	$0.00
Other	$0.00	$0.00	$0.00	$0.00	$0.00
Other					$0.00
Subtotal	$36,500.00	$0.00	$187,240.00	$275,000.00	$498,740.00
Coop Indirect Costs		$0.00	$3,744.80		$3,744.80
FS Overhead Costs	$4,745.00				$4,745.00
Total	$41,245.00	$0.00	$190,984.80	$275,000.00	
Total Project Value:					$507,229.80

Matching Costs Determination	
Total Forest Service Share = (a+b) ÷ (e) = (f)	(f) 8.13%
Total Cooperator Share (c+d) ÷ (e) = (g)	(g) 91.87%
Total (f+g) = (h)	(h) 100.00%

WORKSHEET FOR

FS Non-Cash Contribution Cost Analysis, Column (a)

Salaries/Labor

Standard Calculation						5 Year
Job Description		Cost/Day	# of Days		Total	Total
PM Club Coordination GS 11		$270.00	5.00		$1,350.00	$6,750.00
Rec Mgt Specialist GS 9		$230.00	5.00		$1,150.00	$5,750.00
Trails Technician GS-07		$200.00	5.00		$1,000.00	$5,000.00
Snow Ranger GS 07		$180.00	10.00		$1,800.00	$9,000.00
Snow Ranger GS 06		$150.00	10.00		$1,500.00	$7,500.00
Total Salaries/Labor					**$6,800.00**	$34,000.00

Supplies/Materials

Standard Calculation					Total
Supplies/Materials		# of Items	Cost/Item	Total	
Signs / Lumber		1.00	$500.00	$500.00	$2,500.00
Total Supplies/Materials				**$500.00**	$2,500.00

Subtotal Direct Costs	$7,300.00	**$36,500.00**

Forest Service Overhead Costs

Current Overhead Rate	Subtotal Direct Costs			Total	Total
13.00%	$7,300.00			$949.00	$4,745.00
Total FS Overhead Costs				**$949.00**	**$4,745.00**

TOTAL COST	**$8,249.00**	**$41,245.00**

WORKSHEET FOR

Cooperator Non-Cash Contribution Cost Analysis, Column (c)

Equipment

Standard Calculation

Piece of Equipment	# of Units	Cost/Day	# of Days		Total	Total
Pisten Bully 400 SMT	1.00	$500.00	32.00		$16,000.00	$80,000.00
Total Equipment					**$16,000.00**	**$80,000.00**

Supplies/Materials

Standard Calculation

Supplies/Materials		# of Items	Cost/Item	Total	Total
Pisten Bully Supplies/Parts		1	$5,000.00	$5,000.00	$25,000.00
Pisten Bully SMT Fuel		1,152	$4.50	$5,184.00	$25,920.00
Pisten Bully FWP Fuel		1,152	$4.50	$5,184.00	$25,920.00
Plowtruck FWP fuel		240	$4.50	$1,080.00	$5,400.00
Plowtruck Supplies/Parts		1	$ 5,000.00	$5,000.00	$25,000.00
Total Supplies/Materials				**$21,448.00**	**$107,240.00**

Subtotal Direct Costs	$37,448.00	187,240.00

Cooperator Indirect Costs

Current Overhead Rate	Subtotal Direct Costs			Total	Total
10.00%	$37,448.00			$3,744.80	$18,724.00
Total Coop. Indirect Costs				**$3,744.80**	**$18,724.00**

TOTAL COST	**$41,192.80**	**$205,964.00**

WORKSHEET FOR

Cooperator In-Kind Contribution Cost Analysis, Column (d)

Salaries/Labor

Standard Calculation						5 Year
Job Description		Cost/Day	# of Days		Total	Total
Groomer Operator #1		$500.00	32.00		$16,000.00	$80,000.00
Groomer Operator #2		$500.00	32.00		$16,000.00	$80,000.00
Plow truck Operator		$300.00	10.00		$3,000.00	$15,000.00
Total Salaries/Labor					**$35,000.00**	**$175,000.00**

Equipment

Standard Calculation						
Piece of Equipment	# of Units	Cost/Day	# of Days		Total	Total
Pisten Bully 400 FWP	1.00	$500.00	32.00		$16,000.00	$80,000.00
Plow truck FWP	1.00	$400.00	10.00		$4,000.00	$20,000.00
Total Equipment					**$20,000.00**	**$100,000.00**

Subtotal Direct Costs	$55,000.00	$0.00
TOTAL COST	**$55,000.00**	**$275,000.00**