Environmental Assessment Checklist

Project Name: Spencer Mountain Blowdown Salvage
Proposed Implementation Date: August, 2021
Proponent: Kalispell Unit, Northwest Land Office, Montana DNRC
County: Flathead County

Type and Purpose of Action

Description of Proposed Action:
The Kalispell Unit of the Montana Department of Natural Resources and Conservation (DNRC) is proposing the Spencer Mountain Blowdown Salvage. The project is located approximately 3 air miles west of Whitefish, Montana (refer to Attachments vicinity map A-1 and project map A-2) and includes the following sections:

<table>
<thead>
<tr>
<th>Beneficiary</th>
<th>Legal Description</th>
<th>Total Acres</th>
<th>Treated Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Common Schools</td>
<td></td>
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<tr>
<td>Public Buildings</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MSU 2nd Grant</td>
<td>Section 33 T31N R22W</td>
<td>199.4</td>
<td>76</td>
</tr>
<tr>
<td>MSU Morrill</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern College-MSU/Western College-U of M</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Montana Tech</td>
<td>Section 4 T30N R22W</td>
<td>521</td>
<td>268</td>
</tr>
<tr>
<td>University of Montana</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>School for the Deaf and Blind</td>
<td>Section 9 T30N R22W</td>
<td>642</td>
<td>51</td>
</tr>
<tr>
<td>State Normal Schools</td>
<td>Section 5 T30N R22W</td>
<td>336</td>
<td>155</td>
</tr>
<tr>
<td>Veterans Home</td>
<td></td>
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<tr>
<td>Public Land Trust</td>
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<tr>
<td>Acquired Land</td>
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</table>

Objectives of the project include:
- Generate revenue for the Montana State University, State Normal School, School of Mines, and School for the Deaf and Blind Trusts by salvaging blown-down and wind-damaged trees.
- Reduce fuel loadings along property boundaries from blown down trees.
- Mitigate uncharacteristically severe Douglas-fir bark beetle infestations that would be stimulated by blown-down trees.
Proposed activities include:

<table>
<thead>
<tr>
<th>Action</th>
<th>Quantity</th>
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</thead>
<tbody>
<tr>
<td><strong>Proposed Harvest Activities</strong></td>
<td># Acres</td>
</tr>
<tr>
<td>Clearcut</td>
<td></td>
</tr>
<tr>
<td>Seed Tree</td>
<td></td>
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<tr>
<td>Shelterwood</td>
<td></td>
</tr>
<tr>
<td>Selection</td>
<td></td>
</tr>
<tr>
<td>Commercial Thinning</td>
<td></td>
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<tr>
<td>Salvage</td>
<td></td>
</tr>
<tr>
<td><strong>Total Treatment Acres</strong></td>
<td></td>
</tr>
<tr>
<td>Pre-commercial Thinning</td>
<td></td>
</tr>
<tr>
<td>Planting</td>
<td></td>
</tr>
<tr>
<td><strong>Proposed Forest Improvement Treatment</strong></td>
<td># Acres</td>
</tr>
<tr>
<td><strong>Proposed Road Activities</strong></td>
<td># Miles</td>
</tr>
<tr>
<td>New permanent road construction</td>
<td></td>
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<tr>
<td>New temporary road construction</td>
<td></td>
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<tr>
<td>Road maintenance</td>
<td></td>
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<tr>
<td>Road reconstruction</td>
<td></td>
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<tr>
<td>Road abandoned</td>
<td></td>
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<tr>
<td>Road reclaimed</td>
<td></td>
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<tr>
<td><strong>Other Activities</strong></td>
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</tbody>
</table>

| Duration of Activities:               | 13 Months |
| Implementation Period:                | July 2021 |

The lands involved in this proposed project are held in trust by the State of Montana. (Enabling Act of February 22, 1889; 1972 Montana Constitution, Article X, Section 11). The Board of Land Commissioners and the DNRC are required by law to administer these trust lands to produce the largest measure of reasonable and legitimate return over the long run for the beneficiary institutions (Section 77-1-202, MCA).

The DNRC would manage lands involved in this project in accordance with:
- The State Forest Land Management Plan (DNRC 1996),
- Administrative Rules for Forest Management (ARM 36.11.401 through 471),
- The Montana DNRC Forested State Trust Lands Habitat Conservation Plan (HCP) (DNRC 2010)
- and all other applicable state and federal laws.
Project Development

SCOPING:

- DATE:
  - May 24, 2021
- PUBLIC SCOPED:
  - The scoping notice was posted on the DNRC Website: [http://dnrc.mt.gov/public-interest/public-notices](http://dnrc.mt.gov/public-interest/public-notices)
  - Statewide Scoping List
  - Adjacent Landowners
  - Licensees and Interested Parties
- AGENCIES SCOPED:
  - Montana Fish, Wildlife, and Parks, the City of Whitefish, and THPO representatives for the following Tribes: Blackfeet, Confederated Salish and Kootenai, Cree, Sioux, Northern Cheyenne, Crow, and Gros Ventre.
- COMMENTS RECEIVED:
  - How many: 35
  - Concerns: See Attached
  - Results (how were concerns addressed): See Attached

DNRC specialists were consulted, including: Leah Breidinger, DNRC Wildlife Biologist, Marc Vessar, DNRC Hydrologist, Patrick Rennie, DNRC Archeologist.

Internal and external issues and concerns were incorporated into project planning and design and will be implemented in associated contracts.

OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED: (Conservation Easements, Army Corps of Engineers, road use permits, etc.)

- **Montana Department of Environmental Quality (DEQ)**- DNRC is classified as a major open burner by DEQ and is issued a permit from DEQ to conduct burning activities on state lands managed by DNRC. As a major open-burning permit holder, DNRC agrees to comply with the limitations and conditions of the permit.

- **Montana/Idaho Airshed Group**- The DNRC is a member of the Montana/Idaho Airshed Group which was formed to minimize or prevent smoke impacts while using fire to accomplish land management objectives and/or fuel hazard reduction (Montana/Idaho Airshed Group 2006). The Group determines the delineation of airsheds and impact zones throughout Idaho and Montana. Airsheds describe those geographical areas that have similar atmospheric conditions, while impact zones describe any area in Montana or Idaho that the Group deems smoke sensitive and/or having an existing air quality problem (Montana/Idaho Airshed Group 2006). As a member of the Airshed Group, DNRC agrees to burn only on days approved for good smoke dispersion as determined by the Smoke Management Unit.
**ALTERNATIVES CONSIDERED:**

**No-Action Alternative:** Timber salvage would not occur, and the trust beneficiaries would not receive revenue from the fallen and damaged trees. Hazardous fuel loading that has resulted from blown down timber would not be addressed. There would be an expected increase in Douglas-fir beetle activity without removal of blown down timber.

**Action Alternative:** Approximately 350 thousand board feet (mbf) of timber would be harvested from 550 acres, generating revenue for the aforementioned trust beneficiaries. This harvest would reduce hazardous fuel loading created by the blown down timber. Removal of blown down Douglas-fir will lessen the future impacts of Douglas-fir beetle to adjacent standing trees.

### Impacts on the Physical Environment

Evaluation of the impacts on the No-Action and Action Alternatives including direct, secondary, and cumulative impacts on the Physical Environment.

**VEGETATION:**

**Vegetation Existing Conditions:** There are no rare or endangered plants present in the harvest area. There is no old growth timber in the harvest area. Most of the harvest area will occur in old commercial thinning units that were harvested in 2014. The residual stands in the old harvest units primarily consist of western larch, Douglas-fir, and a minor component of Engelmann spruce. There is an abundance of windthrown and root-pulled trees in the proposed salvage area. Fuel loading has increased as a result of the widely distributed blowdown event. Large concentrations of blown down Douglas-fir are host to broods of Douglas-fir beetle. Exacerbated Douglas-fir beetle attacks could affect green, standing trees in a secondary attack period and the following spring. The vast majority of windthrown and weakened trees consist of Douglas-fir, while approximately 10% of windthrown trees are western larch. The resulting damage has created an opportunity to salvage approximately 500 board feet per acre.

<table>
<thead>
<tr>
<th>Vegetation</th>
<th>Impact</th>
<th>Can Impact Be Mitigated?</th>
<th>Comment Number</th>
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<tbody>
<tr>
<td></td>
<td>Direct</td>
<td>Secondary</td>
<td>Cumulative</td>
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<td></td>
<td>No Low Mod High</td>
<td>No Low Mod High</td>
<td>No Low Mod High</td>
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<tr>
<td><strong>No-Action</strong></td>
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<tr>
<td>Noxious Weeds</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Rare Plants</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Vegetative community</td>
<td>x</td>
<td>x</td>
<td>X</td>
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<tr>
<td>Old Growth</td>
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<td><strong>Action</strong></td>
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<tr>
<td>Noxious Weeds</td>
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<tr>
<td>Rare Plants</td>
<td>x</td>
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<tr>
<td>Vegetative community</td>
<td>x</td>
<td>x</td>
<td>x</td>
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<tr>
<td>Old Growth</td>
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</tbody>
</table>
Comments:

1. This salvage harvest and associated road maintenance may lead to ground disturbance that promotes an increase in noxious weed cover.

2. The windthrown timber resulting from the wind event has elevated the level of hazardous fuels in the project area. Much of the windthrown timber is near or on surrounding property boundaries, also posing a threat to adjacent landowners.

Vegetation Mitigations:

1. DNRC plans to mitigate the proliferation of noxious weeds through herbicide application on road surfaces and adjacent disturbed areas. All equipment would be washed and inspected prior to the beginning of the harvest operations. Areas that are disturbed through road maintenance will be reseeded with site adapted grass to mitigate noxious weed spread. Roads harvest units will be monitored for noxious weeds after harvest operations are complete and herbicides will be applied as necessary.

2. The windthrown trees in the proposed salvage units would be harvested and sold for forest products. Slash generated from the harvest would be piled and burned the following fall.

SOIL DISTURBANCE AND PRODUCTIVITY:

Soil Disturbance and Productivity Existing Conditions: This portion of Kalispell Unit, like much of northwest Montana, is dominated by bedrock consisting of metasedimentary rocks from the Proterozoic age. Rocks in this formation are generally comprised of argillites, quartzites, and siltites. Surface deposits of glacial till, outwash, and lacustrine sediments can be found throughout the area. Overlying these sediments is a layer of loess that has been influenced by volcanic ash deposited and redeposited from Mount Mazama approximately 6,700 years ago (Martinson and Basko, 1998).

The soil survey publication that covers information on the project area is titled Soil Survey of Upper Flathead Valley Area, Montana (USDA SCS, 1960). Five soils series are found in the in the 2012 Spencer Lake Timber Sale area (DNRC 2012); however, activities are proposed primarily on just one of these soil series (Whitefish Series). This soil series is well-drained and is considered a low risk of erosion. Additional information for all landtypes in the area can be found in the Spencer Lake Timber Sale Environmental Assessment (DNRC 2012).

<table>
<thead>
<tr>
<th>Soil Disturbance and Productivity</th>
<th>Impact</th>
<th>Can Impact Be Mitigated?</th>
<th>Comment Number</th>
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<tbody>
<tr>
<td></td>
<td>Direct</td>
<td>Secondary</td>
<td>Cumulative</td>
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<td>No</td>
<td>Low</td>
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<tr>
<td>No-Action</td>
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<tr>
<td>Physical Disturbance (Compaction and Displacement)</td>
<td>X</td>
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<tr>
<td>Erosion</td>
<td>X</td>
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<tr>
<td>Nutrient Cycling</td>
<td>X</td>
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<tr>
<td>Slope Stability</td>
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</table>
### Soil Disturbance and Productivity

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<th>Direct</th>
<th>Impact</th>
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<td></td>
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<td>Low</td>
<td>Mod</td>
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<tr>
<td>Soil Productivity</td>
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### Action

<table>
<thead>
<tr>
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<th>Impact</th>
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<td></td>
<td>No</td>
<td>Low</td>
<td>Mod</td>
<td>High</td>
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<tr>
<td>Physical Disturbance (Compaction and Displacement)</td>
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<tr>
<td>Erosion</td>
<td>X</td>
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<tr>
<td>Nutrient Cycling</td>
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<tr>
<td>Slope Stability</td>
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</tr>
<tr>
<td>Soil Productivity</td>
<td>X</td>
<td></td>
<td>X</td>
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</tbody>
</table>

### Comments:

**S-1:** Physical disturbance from compaction and displacement would be expected on skid trails and landings although the level of impacts would be low. Re-using existing skid trails would minimize cumulative effects. During field reconnaissance, evidence of cumulative impacts from past management was limited to reduce vegetative growth compared to areas outside of skid trails.

**S-2:** Erosion associated with timber harvest (not including roads) would be expected to have a low risk of occurring because of the gentle terrain and the implementation of appropriate Forestry Best Management Practices.

**S-3:** Coarse and fine woody debris provide a crucial component in forested environments through nutrient cycling, microbial habitat, moisture retention and protection from mineral soil erosion (Harmon et al., 1986). As required in the DNRC Timber Sale Contract, both fine and coarse woody debris would be retained to reduce potential impacts to forest productivity. Although fine woody debris would be left on site for nutrient retention, a reduction in annual fine material contribution would result from this alternative.

### Soil Mitigations:

1) Limit equipment operations (harvesting and site preparation) to periods when soils are relatively dry, (less than 20 percent oven-dried weight), frozen, or snow-covered in order to minimize soil compaction and rutting and maintain drainage features. Check soil moisture conditions prior to equipment start-up.

2) On previously harvested areas, the logger and sale administrator would agree to a skidding plan prior to equipment operations. Skid-trail planning would identify which main trails to use and how many additional trails are needed. Trails that do not comply with BMPs (i.e., trails in draw bottoms) would not be used unless impacts can be adequately mitigated. Regardless of use, these trails may be closed with additional drainage installed, where needed, or grass-seeded to stabilize the site and control erosion.

3) Tractor skidding should be limited to slopes of less than 40 percent unless the operation can be completed without causing excessive displacement or erosion. Based on site review, short, steep slopes may require a combination of mitigation measures, such as adverse skidding to a ridge or winchline, and skidding from more moderate slopes of less than 40 percent.
4) Keep skid trails to 20 percent or less of the harvest unit acreage by spacing skid trails at least 60 feet apart. The flat terrain in this project area should facilitate event wider spacing. Use existing skid trails to reduce cumulative area impacted. Provide for drainage in skid trails and roads concurrently with operations.

5) Retain 10 to 15 tons per acre of large woody debris and a feasible majority of all fine litter following harvesting operations. On units where whole tree harvesting is used, implement one of the following mitigations for nutrient cycling: 1) use in-woods processing equipment that leaves slash on site; 2) for whole-tree harvesting, return-skid slash and evenly distribute within the harvest area; or 3) cut tops from every third bundle of logs so that tops are dispersed as skidding progresses.

**WATER QUALITY AND QUANTITY:**
The proposal is limited to harvest windthrown trees and wind-damaged trees that would be prone to dying from insects, disease or stress. No streams were identified in the proposed units. Spencer Lake and its outlet stream are the only identified fish-bearing waters; no proposed salvage harvest is proposed within approximately 150 feet of either waterbody. Additionally, the terrain is nearly flat which substantially lessens the potential for sediment transport.

**Water Quality and Quantity Existing Conditions:** The project area includes DNRC-managed lands in the two 6th-code hydrologic units (HUCs): Lower Stillwater River-Tobie Creek and Lower Stillwater River-Beaver Creek. A thorough field reconnaissance of the proposed harvest area was completed in 2010 including inventory of all potential surface water. Using the field verified information and matching it up with the current proposed salvage harvest units, no harvest would occur within approximately 150 feet of Class 1 surface water or 50 feet of other seasonal water bodies. A thorough discussion of hydrologic resources in the Spencer Lake area is disclose in the Spencer Lake Timber Sale Environmental Assessment (DNRC 2012).

<table>
<thead>
<tr>
<th>Water Quality &amp; Quantity</th>
<th>Impact</th>
<th>Can Impact Be Mitigated?</th>
<th>Comment Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Direct</td>
<td>Secondary</td>
<td>Cumulative</td>
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<tr>
<td></td>
<td>No</td>
<td>Low</td>
<td>Mod</td>
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<tr>
<td><strong>No-Action</strong></td>
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<tr>
<td>Water Quality</td>
<td>X</td>
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<tr>
<td>Water Quantity</td>
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<td><strong>Action</strong></td>
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<tr>
<td>Water Quality</td>
<td>X</td>
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<tr>
<td>Water Quantity</td>
<td>X</td>
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</tbody>
</table>

**Comments:**
H-1: Because no streams are present in the project area and the terrain is nearly flat, no risk of direct adverse impacts from this proposal would be expected from the action alternative. Indirect or secondary impacts would be limited to potential dust transport to surface water. This would have a very low risk of measurable impacts.
H-2: With no stream channels in the project area, no surface water conduit connects the area directly to the Stillwater River or other surface water features. Since the trees are currently dead as a result of windthrow the risk of a measurable increase in annual water yield as a result of the salvage harvest within the 6th code watershed is very low to non-existent.

**Water Quality & Quantity Mitigations:** Follow all Forestry BMPs.
FISHERIES:

**Fisheries Existing Conditions**: Because no streams were identified within the proposed harvest areas and the closest fish-bearing surface water is located no closer than 150 feet from proposed salvage unit boundaries, the risk of potential direct, indirect or cumulative impacts to fisheries populations or habitat is very low and immeasurable. Therefore, no further discussion or analysis for fisheries is warranted for this alternative.

WILDLIFE:

**Wildlife Existing Conditions**: The salvage area is located on north, west, and east facing slopes south of Spencer Lake. The area is frequented by recreationists with the 20-mile Spencer Mountain Trail System located on the west side of the Project Area. The salvage units range from 3,100 to 3,600 feet elevation with salvage logging proposed to remove blowdown and root sprung trees. The stands are composed primarily of western larch and Douglas-fir with a grand fir understory in some areas. Pine grass, ninbebark, snowberry, and other shrubs are common in the understory. All impacts would be additive to any proposed or ongoing activities although DNRC is not aware of any ongoing timber sales in the vicinity.

**No-Action**: None of the proposed activities would occur. In the short-term, no changes to the amounts, quality, or spatial arrangement of blowdown would occur.

**Action Alternative (see Wildlife table below):**

<table>
<thead>
<tr>
<th>Wildlife</th>
<th>Impact</th>
<th>Can Impact be Mitigated?</th>
<th>Comment Number</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Direct</td>
<td>Secondary</td>
<td>Cumulative</td>
</tr>
<tr>
<td>Threatened and Endangered Species</td>
<td>No</td>
<td>Low</td>
<td>Mod</td>
</tr>
<tr>
<td>Grizzly bear (Ursus arctos)</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Habitat: Recovery areas, security from human activity</td>
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<tr>
<td>Canada lynx (Felix lynx)</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Habitat: Subalpine fir habitat types, dense sapling, old forest, deep snow zone</td>
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<tr>
<td>Sensitive Species</td>
<td></td>
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<tr>
<td>Bald eagle (Haliaeetus leucocephalus)</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Habitat: Late-successional forest within 1 mile of open water</td>
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<tr>
<td>Black-backed woodpecker</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Wildlife</td>
<td>Direct</td>
<td>Secondary</td>
<td>Cumulative</td>
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</tr>
<tr>
<td>(Picoides arcticus)</td>
<td>No</td>
<td>Low</td>
<td>Mod</td>
</tr>
<tr>
<td>Habitat: Mature to old burned or beetle-infested forest</td>
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<tr>
<td>Coeur d’Alene salamander (Plethodon idahoensis)</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Habitat: Waterfall spray zones, talus near cascading streams</td>
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<tr>
<td>Columbian sharp-tailed grouse (Tympanuchus Phasianellus columbianus)</td>
<td>X</td>
<td></td>
<td>X</td>
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<tr>
<td>Habitat: Grassland, shrubland, riparian, agriculture</td>
<td></td>
<td></td>
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<tr>
<td>Common loon (Gavia immer)</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Habitat: Cold mountain lakes, nest in emergent vegetation</td>
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<tr>
<td>Fisher (Martes pennanti)</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Habitat: Dense mature to old forest less than 6,000 feet in elevation and riparian</td>
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<tr>
<td>Flammulated owl (Otus flammeolus)</td>
<td>X</td>
<td></td>
<td>X</td>
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<tr>
<td>Habitat: Late-successional ponderosa pine and Douglas-fir forest</td>
<td></td>
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<tr>
<td>Gray Wolf (Canis lupus)</td>
<td>X</td>
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<td>X</td>
</tr>
<tr>
<td>Habitat: Ample big game populations, security from human activities</td>
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<td>Harlequin duck (Histrionicus histrionicus)</td>
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<td>Habitat: White-water streams, boulder and cobble substrates</td>
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<td>Northern bog lemming (Synaptomys borealis)</td>
<td>X</td>
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<tr>
<td>Habitat: Sphagnum meadows, bogs, fens with thick moss mats</td>
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Wildlife

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Peregrine falcon
(*Falco peregrinus*)
Habitat: Cliff features near open foraging areas and/or wetlands

X     X     X

Pileated woodpecker
(*Dryocopus pileatus*)
Habitat: Late-successional ponderosa pine and larch-fir forest

X     X     X     Y     WI-5

Townsend’s big-eared bat
(*Plecotus townsendii*)
Habitat: Caves, caverns, old mines

X     X     X

Wolverine
(*Gulo gulo*)
Habitat: Alpine tundra and high-elevation boreal forests that maintain deep persistent snow into late spring

X     X     X

Big Game Species

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Elk     X     X     X     Y     WI-6
Whitetail     X     X     X     Y     WI-6
Mule Deer     X     X     X     Y     WI-6
Other

Comments:

**WI-1 Grizzly Bear** – The Project Area is located outside of grizzly bear recovery zone and non-recovery occupied habitat (USFWS 1993, Wittinger 2002), but grizzly bears have been sighted in the area and may be displaced by salvage activities. However, a popular high-density trail system is present in the Project Area reducing the likelihood of use of the area by bears. To reduce adverse impacts to sight-distances and security all shrubs and young trees would be protected.

**WI-2 Canada lynx** – The proposed salvage would occur in 144 acres of suitable lynx habitat. However, these acres are unlikely to be used by lynx considering the proximity of the area to Highway 93 and the large network of recreational trails. Minimal impacts on lynx habitat structure are anticipated considering that only downed trees and root-sprung trees would be removed. To ensure that forest structural attributes preferred by snowshoe hares remain following harvest, advanced regeneration would be protected. Additionally, coarse woody debris would be retained (ARM 36.11.414) with an emphasis on logs ≥15 inches.

**WI-3 Common Loon** – Spencer Lake is often occupied by common loons although loon nesting has not been documented in 2021 (as of 15 June 2021, Tally Lake Ranger District USFS,
To protect nesting loons, logging would not be permitted within 500 feet of the lake shore from April 1 – July 31.

**WI-4 Fisher** - Approximately 528 acres of fisher habitat would be impacted by the proposed activities. Blowdown salvage is anticipated to have minimal impacts on fisher habitat suitability although the availability of important habitat characteristics (i.e., snags, coarse woody debris) could be reduced by harvest activities. To reduce adverse impacts the retention of dead material and live snag recruitment trees would be required (*ARM 36.11.411, ARM 26.11.414*).

**WI-5 Pileated woodpeckers** – The proposed activities would affect 520 acres of suitable pileated woodpecker habitat. Since only blowdown and root-sprung trees would be removed these acres would continue providing suitable habitat post-harvest. However, foraging opportunities and habitat quality would be reduced. At least 2 large snags and 2 large snag recruitment trees per acre (>21 inches dbh) would be retained and any snags cut for safety reasons would be left in the woods (*ARM 36.11.411*).

**WI-6 Big game** – Portions of the salvage occur in elk, mule deer, and white-tailed deer winter range habitat as identified by DFWP (2008). The proposed activities would only remove blowdown and trees damaged by the wind event. Additionally, all young trees would be retained to the extent possible. Therefore, minor impacts to thermal cover are anticipated. The proposed activities would be complete by December 2021 would not occur when snowpack is deep because it is difficult to retrieve blowdown under deep snowpack conditions. Thus, negligible adverse direct, indirect or cumulative effects to big game are anticipated.

**Wildlife Mitigations:**

- If a threatened or endangered species is encountered, consult a DNRC biologist immediately. Similarly, if undocumented nesting raptors or wolf dens are encountered within ½ mile of the Project Area, contact a DNRC biologist.
- Contractors will adhere to food storage and sanitation requirements as described in the timber sale contract. Ensure that all attractants such as food, garbage, and petroleum products are stored in a bear-resistant manner.
- Prohibit contractors and purchasers conducting contract operations from carrying firearms while on duty as per *ARM 36.11.444(2)*.
- Common loon timing restrictions apply. Prohibit logging activities within 500 feet of the shoreline from April 1–July 31 as per *ARM 36.11.441(1)*. Hauling would be permitted but should be minimized to the extent possible within the timing restriction area. Timing restrictions may be lifted if loons are not nesting.
- Retain advanced regeneration and shrubs to the extent possible to provide visual screening and break up sight distances.
- Retain at least 2 snags and 2 snag recruits per acre that are ≥ 21 inches diameter or the next largest available size class, favoring western larch and Douglas-fir for retention. Large downed logs may be substituted if standing trees are not available. If snags are cut for safety concerns, they must be left in the harvest unit.
- Retain coarse-woody debris according to *ARM 36.11.414* and emphasize retention of 15-inch diameter downed logs aiming for at least one 20-foot-long section per acre.

**Literature:**


USFWS, and DNRC. 2010. Montana Department of Natural Resources and Conservation Forested Trust Lands Habitat Conservation Plan, Final Environmental Impact Statement,
AIR QUALITY:

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Comments: 1. Smoke will be created from pile burning and dust may be created from log hauling operations.

Air Quality Mitigations: Burning would occur on days approved by the Montana/Idaho Airshed group and DEQ. Conduct test burn to verify good dispersal. DNRC may implement measures to mitigate dust created from hauling operations. These mitigations may include but are not limited to the following: slow driving speeds, restricted haul period, application of dust abatement on road surfaces, required winter harvest.

ARCHAEOLOGICAL SITES / AESTHETICS / DEMANDS ON ENVIRONMENTAL RESOURCES:

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Can Impact Be Mitigated? | Comment Number

Resources of Land, Water, or Energy

**Comments:** Timber harvest activity and associated road work could disturb archaeological resources.

**Mitigations:** The tribes were scoped but none identified a specific cultural resource concern. A Class I (literature review) level review was conducted by the DNRC staff archaeologist for the area of potential effect (APE). This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards. The Class I search revealed that no cultural or paleontological resources have been identified in the APE. Because of the overall steep terrain (from an archaeological perspective), a lack of springs, and the lack of geology that would suggest caves, rock shelters, or sources of tool stone, no additional archaeological investigative work will be conducted in response to this proposed development. However, if previously unknown cultural or paleontological materials are identified during project related activities, all work will cease until a professional assessment of such resources can be made.

**OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:** List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

- N/A
## Impacts on the Human Population

Evaluation of the impacts on the proposed action including **direct, secondary, and cumulative** impacts on the Human Population.

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## Spencer Mountain Blowdown Salvage
### Montana Department of Natural Resources and Conservation

### Will Alternative result in potential impacts to:

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### Density and Distribution of population and housing
- X
- X
- X
- n/a

### Social Structures and Mores
- X
- X
- X
- n/a

### Cultural Uniqueness and Diversity
- X
- X
- X
- n/a

### Comments:

1. Harvest and hauling operations will occur within a high-use recreational area, creating concerns for the safety of recreationists during operational periods.

2. The action alternative will entail the temporary closure of a high-use recreational area, where trails exist under a Special Recreational Use License. Public access will be temporarily closed to provide for public safety.

3. Harvest operations will impact licensed trails in the area. Equipment will cross trails during felling and yarding operations. Licensed trails that occur on existing roads will be disturbed during hauling and road maintenance.

### Mitigations:

1. All trails within the project area will be closed to public access during harvest and hauling operations. Recreational use will not be permitted in the area at any point during the operational period, including evenings and weekends.

2. This closure will be limited to 30 days per trailhead. DNRC will cease closures after operations are complete. Terms of the Special Recreational Use License will be fulfilled. The licensee will be reimbursed for the Acreage Fee, as per section 4c. of SRUL #NWLO-RU3-153.

3. The logging contractor and DNRC project lead will develop operational strategies that will mitigate impacts to licensed trails. Operational strategies will be implemented with the intent to minimize damage to licensed trails within the scope of the Special Recreational Use License Terms. Operational strategies will include a required mutual agreement between the contractor and DNRC project lead to limit skid trail location and trail crossing frequency. Equipment will be required to cross trails at a perpendicular angle when feasible. All haul roads will be bladed and grass-seeded post-harvest to achieve BMP standards.
Locally Adopted Environmental Plans and Goals: List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

N/A

Other Appropriate Social and Economic Circumstances:
Costs, revenues and estimates of return are estimates intended for relative comparison of alternatives. They are not intended to be used as absolute estimates of return. The estimated stumpage is based on comparable sales analysis. This method compares recent sales to find a market value for stumpage. These sales have similar species, quality, average diameter, product mix, terrain, date of sale, distance from mills, road building and logging systems, terms of sale, or anything that could affect a buyer’s willingness to pay.

No Action: The No Action alternative would not generate any return to the trust from timber salvage. The DNRC would not be required to reimburse the licensee for any portion of the SRUL fees.

Action: The timber harvest would generate revenue for the State Normal Schools, School for the Deaf and Blind, Montana Tech, and MSU 2nd Grant Trusts. The estimated return to the trust for the proposed harvest is $54,250 based on an estimated harvest of 350,000 board feet (2,170 tons) and an overall stumpage value of $25.00 per ton. The DNRC would reimburse the SRUL licensee for a portion of the Acreage Fee on a pro-rata basis, as per section 4.c of the SRUL. Costs, revenues, and estimates of return are estimates intended for relative comparison of alternatives, they are not intended to be used as absolute estimates of return.

References


Does the proposed action involve potential risks or adverse effects that are uncertain but extremely harmful if they were to occur?

No.

Does the proposed action have impacts that are individually minor, but cumulatively significant or potentially significant?

No.
Finding

Alternative Selected
Action Alternative

Significance of Potential Impacts
I find that the impacts of the proposed action alternative as described in this Environmental Assessment are not significant. This Environmental Analysis has been completed for the Spencer Mountain Blow Down Salvage Timber Permit. After a thorough review of the EA, project file, response and discussions with Department and other specialists, Department policies, standards and guidelines, and the State Forest Land Management Rules, and HCP rules I have taken the decision to choose the action alternative. I believe that this EA has described a good approximation of what this project would accomplish; salvage dead and dying timber before it loses its economic value, reduce fuel loadings along property boundaries from blown down trees and reduce Douglas-fir bark beetle populations in the area. It is expected that this treatment would reduce the fire hazard and help to maintain the natural structure of the classified forested lands in this area. Skid trails will be concentrated to areas where blown down and damage trees are located and care will be taken during logging around existing trails and features.

Need for Further Environmental Analysis

☐ EIS  ☐ More Detailed EA  ☒ No Further Analysis

Environmental Assessment Checklist Approved By:

Name: David M. Poukish
Title: Kalispell Unit Manager
Date: 7/12/2021
Signature: /s/ David M. Poukish
Attachment A- Maps
Name: Spencer Mountain Blowdown Salvage
Legal: Section 33 T31N R22W, Sections 4, 5, 9 T30N 22W
Attachment B – Scoping Comments and DNRC Responses
Response to Public Comment
(Response to comment letters 1-31 is found on page 33)

Comment Letter 1

Hi there Riley,

My name is Aaron Young, and I am resident of Kalispell Montana. First of all, I want to thank you and the DNRC for your services to our land. I spend so much time wandering, recreating and enjoying time on state DNRC land, and it’s such a privilege.

Now, time for my thoughts, and thanks for reading.

Spencer Mountain Bike trails have come a long way. I remember when my friends would spend hours there, riding these rickety, sketchy stunts on their bikes, and the people that used the land were few and far between. When I drive by Spencer Mountain now, I’m amazed at how many cars are parked at it’s trailheads. It’s become a world class destination for mountain biking, it’s truly incredible to see the transformation.

It’s understandable to keep the forest clean of deadfall, and to keep the woodlands healthy and thriving, and it’s important to maximize the value of timber, especially when demand for it is so high. However, this portion of land is extremely valuable to the community in Northwest Montana, and to all of the visitors that travel here to enjoy it. Bike trails are extremely sensitive to damage, and Spencer Mountain has already weathered the aftermath of massive logging effort from a few years ago. Recreation is more popular than ever before especially in today’s economy, so I please ask you to consider alternatives to this plan, I know it’s impossible to satisfy everyone, but it’s at least worth a try.

TLDR (Too Long; didn’t read) Version: Recreation is more important than the timber on this land. Please do not botch the trails if this timber sale plan continues, or better yet, find another chunk of forest to clean up and sell.

Thank you,
Aaron Young

Comment Letter 2

Dear Riley Stevenson,

As an avid mountain biker and user of the trails at Spencer Mountain, I am writing to provide some comments regarding the impending blowdown salvage permit. I’ve spent over 50 hours doing trail work at Spencer Mountain and hundreds of hours riding the trail network there since the inception of the official network of trails there. The timing of the salvage comes at the peak time of the biking season when it will have the largest possible negative impact on the recreation community. By moving the salvage operation to the fall, the negative impact could be drastically reduced to a much more reasonable level.
I would like to request that the DNRC does everything in its power to limit the length and extent of trail and trailhead closures and to ensure that the salvage operator limits or completely avoids damage to the existing network of trails, especially including honoring Flathead Area Mountain Bikers’ feedback on the placement of skid trails. I also support Flathead Area Mountain Bikers’ request for a refund or credit on SRUL fees in a pro rata amount equal to the extent of any closure or subsequent closures required due to unsafe trail conditions after the project is complete, although this reimbursement amount will not likely even come close to the cost required to repair the damage to the existing trails.

Sincerely,
Dan Hansen
Flathead Valley Resident and Trail User Since 2012

---

Comment Letter 3

Hello,
I am writing to comment on the proposed logging at Spencer Mountain. I am a mountain biker and a regular Spencer Trail user. I also contribute both financially and in volunteer hours to the Flathead Area Mountain Bikers. I am writing to request that the DNRC make every effort to limit the time and extent of trail closures, as well as to minimize damage to the Spencer trails, features, and the trailhead, including honoring FAMB's feedback on the placement of skid trails. FAMB and its volunteers invest an enormous amount of time building and maintaining the Spencer trail system, and it would be devastating to the local users to see it damaged.

I also support FAMBS's request for a refund or credit on its SRUL fee in a pro rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.

Thanks for your time,
Genevieve Thomas
Whitefish, MT

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Comment Letter 4

Dear Riley:
This letter is in response to the Scoping Notice alerting the public to the proposed Spencer Mountain Blowdown Salvage Permit, dated May 24, 2021. FAMB appreciates its partnership with the DNRC throughout the years as we’ve managed and maintained a portion of Spencer Trails for recreational use for the benefit of the public pursuant to our Memorandum of Understanding with the City of Whitefish dated as of August 21, 2013, as amended on March 22, 2017 (the “MOU”). We acknowledge and understand that, pursuant to the Special Recreational Use License granted to the City of Whitefish by the DNRC dated as of January 6, 2014 (the “SRUL”), the primary use of these state trust lands is income generation for the benefit of various Montana educational institutions, and that the recreational use is a secondary use under the SRUL.

In terms of trails managed and maintained by FAMB, this salvage operation as proposed has the potential to directly and significantly impact Otter Pop, Maple Syrup, Recess, Malice in Plunderland, and Big Gulps, Eh?, plus impacts to the rest of the trail system and trailhead indirectly via closures that may be required due to the presence of logging trucks and other hazards.
We were dismayed to hear that you were not willing to postpone this timber salvage sale – as FAMB has requested - to the Fall months when recreational use is not at its peak as it is during the midsummer months, which is when this salvage sale is targeted for. We do understand that there is very real risk for resource damage from Douglas Fir bark beetles. We also understand that this salvage sale is motivated by the current high market price of lumber and that the DNRC is statutorily obligated under Montana state law to manage these state trust lands for the financial benefit of several Montana educational institutions. That all being said, we have made several requests to you in this matter that we hope you will honor and follow through on, and recent conversations with you have provided us with encouragement that this will be the case. Our requests are squarely aimed at preventing and/or mitigating damage to the trails, technical terrain features (TTFs), and the trailhead at North Spencer. FAMB has invested heavily in Spencer Trails over the last seven years - to the tune of $83,000 in RTP-funded trail and TTF construction and maintenance costs, and 2,528.25 hours of FAMB volunteer trail construction and maintenance labor (which has a value of $63,206.25 at $25/hour), plus significant administrative payroll costs, all for the benefit of the public. A substantial portion of that money has been spent on trails that are within the salvage sale project area.

The SRUL requires the DNRC to work with the licensee to minimize impacts to recreation, stating in Section 7(C) that “licensee will be invited to participate in the MEPA process to develop a solution that minimizes impacts to licensed activities while meeting Trust Land Management goals.” The SRUL also provides in Section 26(E) that “when forest management activities are scheduled that may impact the SRUL corridor, DNRC will take reasonable precautions within the scope of the logging process to avoid unnecessary damage within the trail corridor.” Below, FAMB lays out several safeguards that we believe must be taken by the DNRC in order to minimize unnecessary impacts to recreation on Spencer Trails.

First, we are happy to hear that the DNRC intends to limit any temporary closure of any or all of Spencer Trails, including the trailhead amenities, to a 30-day period as required under Section 26(G) of the SRUL. Because the DNRC has the ability to place restrictions and requirements in the unit card and resulting salvage sale contract, FAMB has requested that the timber salvage operation cross trails only in this manner so as to “minimize impacts to licensed activities while meeting Trust Land Management goals”, as mandated under Section 7(C) of the SRUL:

- perpendicularly,
- with skid trails no wider than 15’,
- as infrequently as possible but no more than every 200’, and
- to avoid all built trail features including bermed turns and freeride features (with a 50’ no-work zone around any built wood features to protect approach/landings which take significant investment to construct and often help provide stability to the structure).

We have also requested an explicit ban on skidding up or down trail corridors “to avoid unnecessary damage within the trail corridor” pursuant to Section 26(E) of the SRUL, and have requested that the DNRC walk the affected trails with a FAMB representative to flag zones where skid trails would be best placed, and to designate zones as “off-limits” for skid trails due to significant past investments made by FAMB in certain trail features and TTFs. Furthermore, we request that the salvage operator be contractually obligated to abide by these restrictions during the salvage operation. These safeguards would help satisfy section 7(C) of the SRUL mandating that the licensee “be invited to participate in the MEPA process to develop a solution that minimizes impacts to licensed activities while meeting Trust Land Management goals”. When we last spoke, both FAMB and the DNRC were committed to doing this “walk-through”, and FAMB was encouraged that both parties seemed to agree that skid trails could be placed so as to minimize unnecessary damage yet still allow for the practical harvest of timber, and that such zones could be marked and dictated to the operator. FAMB’s key objective here is to ensure that the salvage operator is contractually obligated to abide by these requirements and that there be a mechanism for such contractor to be held accountable for disregarding any such requirements and inflicting significant, unnecessary damage to the trails and features. As such, we would like to do this walk-through at a time that allows for these safeguards to be placed in the unit card and salvage contract. FAMB also extends the offer to be a point of contact with whom the operator can consult during the salvage operation for any
questions the operator has, with the understanding that the DNRC is the operator’s main point of contact during the salvage operation.

FAMB has requested that log landings and slash piles be located away from trail junctions and trail corridors, since they can create a safety hazard if located in a runout zone or near a trail intersection and the woody debris left over from log decks and slash piles is detrimental to the trail tread and difficult to repair. We would like to cover this during the above-mentioned walk-through with the DNRC and are happy to serve in a consulting role with the salvage operator if necessary and helpful.

FAMB requests that the DNRC give as much prior notice as possible to the City of Whitefish, Whitefish Legacy Partners, and FAMB of trail closures and restrictions of public access. The DNRC is the appropriate party to take on the responsibility of providing to the public via on-site signage all necessary information regarding trail closures at trailheads and anywhere else in the project area deemed necessary or appropriate, as well as a public announcement in print and/or social media if this isn’t already part of the salvage sale process. FAMB is happy to assist in this process by getting the word out about closures via social media or subscriber email communications.

FAMB has specifically requested that every effort be made to limit the time span of trail closures, as well as the overall trail mileage of closures, with the recognition that closing a significant portion of a trail effectively closes the entire trail for recreational use. This is especially true in the case of trails that are designated primarily for downhill traffic, which includes all trails managed and maintained by FAMB at Spencer.

Additionally, FAMB requests that the contract require the salvage operator return the trailhead to the same condition it was in prior to the salvage operation. FAMB, along with Whitefish Legacy Partners, has invested substantial funds in the grading and graveling of the trailhead, and any damage needs to be promptly addressed. Since repairing the trailhead will almost certainly require a continued closure of the trailhead, FAMB requests that this work be completed within the 30 day period required under Section 26(G) of the SRUL.

FAMB also anticipates that, even with the salvage operator taking reasonable precautions to preserve and avoid damaging the trails, some damage is inevitable. As such, as part of this project, FAMB requests approval to use a mini-excavator (no larger than 10,000 lbs) to repair all trails within the project area, as needed. As with past use of a mini-excavator, FAMB would notify the DNRC prior to moving the machine on site and would ensure that the machine had been cleaned so as to minimize the spread of noxious weeds.

As we have discussed, this process will require some “give and take” on both sides. If this project is slated for completion during peak recreational use months (now through the end of October), FAMB formally requests a pro rata refund or credit of SRUL fees proportionate to the acreage and mileages of trail affected (keeping in mind the point above regarding “effective closure” of entire trails and networks when a significant portion of a trial or network is closed) and a pro rata refund of the Base/Recreation Use fees associated with that time frame (recognizing here that the apex of recreational use occurs midsummer and slowly tapers until dropping steeply in October). This pro rata refund should extend to the time when FAMB is next able to conduct repair and reconstruction work on damaged trails, most likely Spring of 2022. This gesture would serve to recognize that the licensed use FAMB will have paid for as of June 15, 2021 is being temporarily taken away. A refund/credit determined in the above-mentioned manner is arguably just a de minimis cost of doing business (the salvage sale), especially when taken in the context of the substantial income likely to be generated by the salvage sale. FAMB would invest these funds instead in repairing damage done during the salvage operation, although we anticipate this may not even come close to covering the cost of repairs after this operation.

FAMB is committed to a continued partnership with the DNRC, the City of Whitefish, and Whitefish Legacy Partners at Spencer Trails. We appreciate the time DNRC has spent explaining the timber salvage sale process and its justifications.
FAMB is contractually obligated to manage and maintain Spencer Trails for the benefit of the public - specifically recreationalists. We take this responsibility very seriously, and feel that the requests made in this letter are those that we must make in order to prevent unnecessary damage to a trail system in which FAMB has invested a total of $146,206.25, plus significant administrative payroll, since 2014. Although recreation is the secondary use under the SRUL, the SRUL requires the DNRC to work with the license holder to prevent any “unnecessary damage” to trails and trailhead amenities. We have laid out some achievable objectives toward accomplishing this goal, and we are encouraged by the willingness expressed by the DNRC to do what is necessary to minimize any such unnecessary damage.

Sincerely,
Dan Hansen
President
Flathead Area Mountain Bikers, Inc.

Comment Letter 5

Hello,

I am an avid mountain biker and regular user of the mountain bike trails, both freeride and cross country, at Spencer Lake in Whitefish. As a Whitefish local, these trails are an important part of the way I recreate, especially after work during the summer months. Furthermore, my wife and I are signed and named trail sponsors of one of the trails, as well as trail volunteers and FAMB members.

I understand that logging and timber salvage are an important part of keeping Spencer profitable, and necessary to ultimately manage the land. I do, however, ask that any logging or timber salvage operation be postponed until the fall, when traffic and use greatly decrease at Spencer. Closing these trails during the peak of their usage season will not only take away the main usage area for a lot of local mountain bikers, but will also take away a unique set of trails that Whitefish markets itself on to tourists.

If the DNRC plans to go forward with the proposed operation on their proposed dates, I implore you to make as many efforts as possible to limit closure time and minimize trail and feature impact, including honoring FAMB’s feedback and requests for skid trail placement.

Lastly, if the trails are going to be closed and impacted, I would very much like to request that FAMB is given a refund toward their SRUL for the time that the trails are closed, as well as time any trail damage needs to be repaired. Furthermore, as a donor to specific trails at Spencer, I would expect that FAMB would also be reimbursed and compensated for lost advertising to signed trail donors.

I realize there are many factors the DNRC has to consider when planning this timber salvage operation. However, the proposed timing could not be more detrimental to the central users of the trail system and will ultimately render FAMB’s major financial and man-power investments in the Spencer trail system far less cost effective.

Thank you for your time and consideration.

Sincerely,
Kyle Watkins
FAMB member and donor
Comment Letter 6

Please consider an alternative timeframe for logging the front side of Spencer, like late fall, when it’s not prime recreation time. I am a FAMB member and I enjoy mountain biking and hiking at Spencer during the summer. I hope you can work closely with FAMB on this process. They have worked extremely hard to make Spencer an amazing recreation area for locals.

Thanks,
Paul Feldt
FAMB Member
Spencer user since 1996

Comment Letter 7

Hello Riley,
I am a mountain biker from Missoula and I would like to comment on the upcoming timber salvage sale at Spencer mountain to harvest downed trees. Spencer is a truly special place for western Montana mountain bikers and one of the only non-lift access purpose built trail systems in the Pacific Northwest. The Flathead Area Mountain Bikers (FAMB) and citizen volunteers have put an enormous amount of work into the trail system to make it what it is today. It is now a destination-worthy mountain bike trail system that draws tourism from all over Montana and beyond. Living in Missoula, I have never been able to make any trail work sessions at Spencer, but I give to FAMB annually specifically for the purpose of using it for the construction and maintenance of trails at Spencer.

I ask the DNRC to do everything in its power to during the timber salvage to avoid equipment damage to the trails, features, and trailhead. The Spencer trails are built upon the sweat, effort, and funding from the community and they cannot be repaired or replaced easily. Please also honor FAMB’s requests for the placement of skid trails to limit damage. They know the trail layout and the value of their work better than any contractor. In the effort of fairness, I also want to express my support for FAMB’s request for the refund or credit of it’s SRUL fee in a pro rata amount equal to the extent of the required trail closures due to unsafe conditions that will likely be needed after the project is complete. FAMB pays the SRUL fee to enable the public to use the trails and the trail closures would amount to an impediment to their use.

I also want to add that it is extremely disappointing that the timber harvest has been planned for the middle of peak mountain bike season. I understand that there are other factors at play, but FAMB is a fee-paying user in good standing. It would seem reasonable that the DNRC could plan around the circumstances of Spencer’s primary use and put user conflict as a higher priority.

I appreciate your consideration of these comments.

Thanks
Eric Anderson

Comment Letter 8
Dear Riley,

I am writing in response to the DNRC’s plan for a salvage sale at Spencer Mountain this summer. As a Whitefish resident and local user of these trails, I kindly ask that the DNRC include mitigations in the salvage sale to protect and minimize impacts on the recreation infrastructure including trails, trail signs, and built trail features.

I also request that the DNRC not close the Twin Bridges trailhead, Whitefish Trail, and Freeride Trails during the apex of summer use, and instead consider delaying the sale until the fall when trail use is less and/or consider allowing public access during the evenings and weekends.

Finally, I am concerned about trail user safety during logging operations, increased logging traffic, and increased dust. I support the need to remove the downed trees before a bark beetle infestation harms the living trees and the DNRC’s objective to generate revenue on behalf of MT schools and universities, but it would be great if this could be undertaken while supporting existing recreation during Montana’s short summer season.

Thank you for your consideration.

Best,

Katherine Ward

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Comment Letter 9

Hi Riley,

I’m an avid mountain biker and work full-time as a trail crew member for FAMB. I just got word about the planned closure of Spencer Mountain later this summer and I’m writing this email to express my strong opposition.

Last summer I was on Bike Patrol/Trail Crew for Whitefish Mountain Resort, and a lot of our job was to reopen trails that had been impacted by the logging operation that took place in spring 2020. It seemed the logging that happened had no regard for the trails. As a result we had to take months to completely rebuild 3 trails, along with various sections of the Summit Trail. Rebuilding is hard, especially when there is an expectation from the public that the trails will be the same or similar to how they were before. There was a lot of disappointment that was voiced by bikers about the changes to some of the trails. Some of that cannot be avoided, however the operators of that project seemed to walk their equipment everywhere they could.

It seems the actual act of logging these downed trees isn’t up for discussion, but I would like to express my concern as a biker and trail crew member. I am worried that the logging will impact the trails more than we think, and it will be hard to rebuild (especially if it’s a dry fall season). Experiencing the fallout of the logging at the Resort and the rebuilding of the trails over the course of several months with a 10 person trail crew, I’m not sure rebuilding these high-use trails will be possible with our current 4 person crew.

If desired, I am open to extensively flagging all the trails you think will be impacted in the slightest, in order to hopefully reduce the impacts the logging equipment will have on them. As you know, FAMB has put in a lot of time and money into these trails and no one wants to see that wasted. I support FAMB’s request for a refund or credit on its SRUL fee in a pro rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.
I hope you read this with the understanding that people across the Flathead Valley will be impacted by this salvage operation. The end of the summer is when people try to bike and get out on trails as much as possible because winter is coming. I think the timing of this operation could have been better, but it seems that is not up for discussion as well.

Please let me know if I misunderstood anything, as I would like to know exactly what is happening and why, so I can continue to be a vector of information to the public.

Thanks for your time,
Stephen Keimach

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**Comment Letter 10**

Hi Riley,

My wife and I are mountain biker riders and equestrians that use the Spencer Mountain Trails, and we have some concerns regarding the upcoming salvage operations.

Because of ever-increasing recreational pressure in the Flathead Valley, we feel that ALL existing trail networks are essential. Less is a bad idea, especially during prime riding season months.

So we are asking that DNRC do everything reasonably possible to limit the time and extent of Spencer trail and trailhead closures. Additionally, we feel that the salvage operator needs to be *required* to avoid/limit damage to trails, features and trailheads. They should post an upfront bond to cover this, in the unlikely event that they do not follow through.

Additionally, FAMB should receive a refund (or credit) on its SRUL fee based on the extent of the closure and any subsequent closures required due to unsafe trail conditions after the salvage project is complete.

Thanks for your time!

Tom and Ruth

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**Comment Letter 11**

Hello Riley,

I was made aware of the salvage timber sale on the Spencer land and wanted to reach out with some concerns I have. I decided to relocate to Whitefish a couple years ago, due in large part to the great mountain biking and trails network in the Flathead - in particular, the area that stood out (and continues to) was Spencer.

I do understand the need to close trails, but would strongly request that the time spent on the land is as limited as possible. More importantly, there have been a large number of volunteer hours spent on the land and I have significant concerns with the operations permanently damaging these great trails.
I completely understand the purpose of the state lands and the need to maintain and support the school funds, but please, please, please do everything possible to keep this land as undisturbed as possible. To that end, if damage is done and time during the peak riding/hiking season is restricted, I highly support FAMB's request for a refund or credit for its SRUL fee.

Thank you for your time and please feel free to reach out with any questions.

Best,
Chase DeHan

Comment Letter 12

Mr. Stevenson,

I am a mountain biker, Spencer trails user and a full-time resident of the Flathead valley. The Spencer trail system is a unique economic and recreational resource for the north valley. It provides recreational opportunities to local and visiting mountain bikers that are exceptional- it is the only trail system in the Flathead valley that contains terrain features that attract the most aggressive trail users.

I am writing to request that the DNRC limits both the time and extent of proposed logging operations at Spencer Mountain. While I understand the economic, environmental and public safety implications of clearing the blowdown at Spencer Mountain the DNRC is proposing that Spencer Mountain closes during its peak usage period. This will have a major impact on local trail users and businesses that rely on rentals for the Spencer Mountain trail system. The DNRC must do everything within its power to ensure that the salvage operator avoids damage to trails, features and the trailhead. Volunteers pour thousands of hours of time into the trail system every year to maintain the unique berms, jumps and wood features that are unique to this trailhead. If they are damaged by the salvage operator it will be a crushing blow to the community. The salvage operator must understand that they are operating in an area that is used heavily by the community and treat the land with the same respect that local trail users do.

If the DNRC moves forward with logging the extent of the operations should be optimized for time to delivery and reduction of damage to the trail system to avoid further impacts to local users. Finally, I believe the DNRC should refund or credit FAMB and/or Whitefish Legacy Partners on its SRUL fee equal to the extent of any closure due to logging or trail repair that’s required as a result of damage by the salvage operator. Local residents are PAYING the state to use this land for recreational purposes and the proposed salvage operation essentially revokes that contract right out from under our feet. The least you can do is refund the money that we have paid for trail access that the state is revoking.

On a recent ride from the South Spencer trailhead I encountered residents enjoying the trails on horseback, bike, and on foot. Clearly this is a multi-recreational trail system that is beloved by the community and logging will have an impact far beyond mountain bikers. The DNRC must do what's right and reimburse FAMB and WLP for SRUL fees, as well as be good stewards of the land by limiting logging operations and trail damage.

kind regards,

Will Urbanski

Comment Letter 13
Mr Stevenson,

I am a resident of Whitefish and a regular user of the Whitefish Trail. Anyone who uses the North Spencer Trailhead or who lives in this area can tell that this trailhead parking lot is nearly full or overflowing every day of the entire biking/hiking season. It is one of the most popular and heavily used areas in the WFT system.

The proposed salvage timber sale probably makes good sense in some respects. I know there is a lot of blowdown up there. But, for HEAVEN’S SAKE, does this work really have to be done in the middle of our busiest and best season?!? Why in the world couldn’t the project be done in the winter? I do not believe that the revenue from this sale will begin to offset the loss of revenue that would be generated by the multitude of recreational users of the trail this summer!

PLEASE reconsider the unfortunate timing of this timber project. This a community project!

Thank you,
Mike Buesseler

Comment Letter 14

I get that you need to do your work, but doing it in the height of the tourist season doesn't make much sense to me. We have two shoulder seasons, one coming in the Fall, when there are fewer tourists.

The amount of money that comes into the Valley is huge and part of that draw are the biking and hiking trails close to town. Spencer Mountain is perfect for that.

Please reconsider the timing of the Salvage.

Thank you, Sally Schmidt

Comment Letter 15

DNRC Kalispell Unit,

On behalf of the Legacy Lands Advisory Committee, comprised of members of the City of Whitefish City Council and Board of Directors of Whitefish Legacy Partners, please accept the following public comments in response to the May 24, 2021, Spencer Mountain Blowdown Salvage Permit public scoping notice.

In partnership, Flathead Area Mountain Bikers, City of Whitefish, and Whitefish Legacy Partners construct and maintain the Spencer Trails and Whitefish Trail at Spencer Mountain on behalf of the Whitefish community. The 10-year SRUL was put in place to secure the public’s right to recreate at Spencer Mountain, as well as to assist the DNRC in managing the existing dispersed and unmanaged recreation in the area. We recognize that timber management is the primary use of the State Trust Lands at Spencer, and we believe the managed recreation of the Spencer Trails and Whitefish Trail have become an important secondary use to the State, both in how these lands benefit the public and the financial benefit provided to Montana’s schools and universities. We ask that you support the recreation asset as you plan the Blowdown Salvage Permit. We recognize the need to conduct salvage operations to protect against bark beetle infestation,
promote forest productivity, and to reduce future wildland fire hazard, and we ask that the DNRC also help protect the community’s significant interest and investment in the recreation infrastructure at Spencer Mountain throughout the salvage operations.

The State and community have invested a great deal of time and energy in constructing, maintaining, and managing the Spencer Trails and Whitefish Trail through public grant funding and private donations, as well as everyone’s time spent working together to carry out the Whitefish Area Neighborhood Plan and the SRUL. The 2014 10-year SRUL ensures the recreation investments will be protected as the SRUL states “when forest management activities are scheduled that may impact the SRUL corridor, DNRC will take reasonable precautions within the scope of the logging process to avoid unnecessary damage within the trail corridor” (Section 26E), “minimize impacts to licensed activities while meeting Trust Land Management Goals” (Section 7C), and “avoid unnecessary damage within the trail corridor” (Section 26E). In order to fulfill the mandates of the SRUL, the Legacy Lands Advisory Committee requests that the Spencer Mountain Blowdown Salvage Permit environmental assessment clearly identifies all recreation mitigations to be included in the permit contract, and that the DNRC’s sale administrator will actively ensure the conditions are met. As the SRUL states, the MEPA process should be used to “develop a solution that minimizes impacts to licensed activities while meeting Trust Land Management Goals” (Section 7C).

Specifically, we ask that the salvage sale protects the existing recreation infrastructure and public access, is included as a sale objective, and that the following mitigations are included:

1. Plan harvest unit boundaries and unit plans to avoid recreation infrastructure as possible.
2. When skid routes must cross a trail, concentrate skidding in established routes to reduce the number of trail crossings, ensure crossings are made perpendicular to the trail, and are limited to no closer than 200’.
3. Prohibit skidding on existing licensed trails.
4. Ensure all skid trails are no more than 15’ wide and reclaimed after salvage work is complete including use of brush and logs to discourage social trails.
5. Ensure all skid trails avoid built trail features such as bermed turns, freeride features (with a 50’ no work zone around any built wood features), and sign posts.
6. In areas of high trail and built feature density, conduct site visit with sale administrators and recreation partners (FAMB, WLP, City) to determine best possible skid routes and trail crossing locations.
7. Avoid road widening and expansion of licensed roads/trails when possible.
8. Design timber haul route through the Twin Bridges Trailhead to avoid damaging trailhead infrastructure including vault toilet, kiosk, sign posts, trash can, landscaping boulders, and parking area/driveway surface. Ensure that the trailhead is returned to existing conditions following the completion of the sale.
9. Following the completion of the sale, restore roads licensed under SRUL back to favorable recreation conditions with reseeding, hiker/biker compatible water bars, and compaction of loose materials.
10. Treat impact areas near trails, roads, and trailheads for noxious weeds following salvage, and in upcoming years.
11. If needed, provide appropriate permissions for trails to be rehabilitated by the City, WLP, and FAMB after the Salvage Sale to ensure a high quality recreation experience on the 39” Whitefish Trail and freeride Spencer Trails.

In addition to reducing sale impacts on recreation infrastructure, we also request that the DNRC consider recreation and public access in planning the timing and associated sale closures. While the SRUL allows for closures of up to 30-days, we ask that the DNRC work with the sale contractor to plan the phasing of the sale to reduce all closures as much as possible. While we recognize the incompatibility of active hauling with public use of the Twin Bridges Trailhead, we request that trailhead and access to trails be reopened outside of active operations (evenings and weekends). Additionally, as the sale administrator, we request that the DNRC provides clear, easy-to-find closure and sale information postings to help the public successfully navigate the salvage operations.
If a lengthy closure during the height of the recreation season is planned, a SRUL credit proportionate to the acreage and mileages of trail affected (either by formal closure or access being cut off by closures) and the base fee associated with the closure timeframe will be requested, including closures incurred to repair damaged trails.

As the demonstrated over the past decade and a half with all the timber sales and salvage sales that have occurred on State Trust Lands around the Whitefish Trail, with planning, communication, and careful sale administration, we believe it is feasible for the DNRC to include protecting the recreation infrastructure as a sale objective, designing reasonable mitigations to lessen the sale’s impact on the recreation infrastructure, and minimizing public closures, all while achieving forest management goals and generating revenue for Montana schools and universities. On behalf of the community, the Legacy Lands Advisory Committee requests the DNRC include the above mitigations in the salvage sale contract to ensure that the SRUL provisions to reduce tail impacts are met, and the public’s vested interest in protecting the landscape, user experience, and conservation values of Spencer Mountain are respected.

Thank you,
Legacy Lands Advisory Committee, City of Whitefish and Whitefish Legacy Partners staff:
Maria Butts, Director of Parks and Recreation, City of Whitefish
Andy Feury, City Councilor
Steve Quell, City Councilor
Heidi Van Everen, Executive Director, WLP
Margosia Jadkowski, Program Manager, WLP
Diane Conradi, WLP Board member
Becky Smith-Powell, WLP Board member

Comment Letter 16

Riley,
Hello. I’m writing to give my opinion on the Spencer salvage logging. I am a mountain biker and trail runner who frequently uses the trails at Spencer. I am often there multiple times per week recreating, so I certainly think that the area is a very important community and recreation site in the Whitefish and Flathead Valley. I do include community, as this is a popular site for local residents to congregate to enjoy an outdoor experience, from adults to kids. I myself have invested 10-15 hours of volunteer trail work for these trails. There is no other site in the valley like this, with multiple types of trails offering this type of freeride mountain bike experience. I also note the number of out of town users that are often in the parking lot. This site is an important component of the the outdoor recreation of the Flathead valley that draws visitors to the areas. I would ask that the DNRC please make all efforts to limit the time of trail and trailhead closures so as to mitigate the impacts of local use and tourism loss of the use of the site. I would also ask that the DNRC mitigate or avoid trail damage wherever possible, especially around specially built features that have taken time and money to construct. I do also support FAMB’s request for a refund or credit on its SRUL fee in a pro rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.

Thank you so much,
Joel Shehan
Comment Letter 17

Hello there. It has been brought to my attention that the trails on Spencer mountain will be closing soon for clean up of fallen trees. I have been riding these trails on my bike for several years now and have also helped with trail work to restore trails on Spencer Mountain. These trails are very special to me and all of my friends who use these trails. I ask that the trails and the features be spared from the brunt of any abuse by any heavy equipment. Please take care around these trails. They are very special to the valley and those that recreate upon them.

Thanks work your time
Nicholas Johnson

Comment Letter 18

Riley Stevenson:

Good afternoon. I'm writing to you as a mountain biker in the Flathead Valley. I ride out at the Spencer trails a few times a year but more importantly, I am part of the Flathead Composite NICA (National Interscholastic Cycling Association) Team as a coach for youth cycling.

The trails at Spencer provide an invaluable place for mountain bikers of all ages and abilities to practice their technical riding skills. There is no other place like it around here that is so accessible and free to everyone. Between volunteer trail work and coaching sessions, I have spent 12 hours on these trails in the past year.

For the upcoming logging operations, I encourage you to ensure that workers minimize their impact on these trails per Flathead Area Mountain Bikers suggestions. As an employee of another trails non-profit, I understand the needs of landowners to close trailheads and portions of trails for logging operations. The timber sales near Herron Park in both 2018 and 2019 saw minimal damage to the existing trails because of the care executed by Weyerhaeuser.

I also encourage you to prorate the permit fees paid by FAMB congruent with the amount of time trails will be inaccessible. Money saved can then go directly to repairing those sections by your partner. Nonprofits like FAMB are largely funded by the community and it is important to stretch those dollars whenever possible.

Sincerely,

Gabe Dillon

Comment Letter 19

Hi:

As a local mountain biker I wanted to send a quick note in support of FAMB’s request that the upcoming DNRC timber salvage at Spencer be done with as little impact as possible on the trails and the ability of riders to enjoy them this summer.

Spencer is an amazing trail network that has become a very popular local amenity for both locals as well as visitors to our area. Having done trail work there with FAMB several times myself, I can vouch for the huge amount of effort and man power that has gone into making that place as special as it is. And, being aware of FAMB’s fundraising efforts they
continually engage in to support and maintain Spencer and other trails in the valley, I hope the DNRC understands and will grant the request to refund or credit the user fee paid for the period the trails are shut down for the timber salvage.

Thanks!

Andy Crites
Columbia Falls

Comment Letter 20

Hi Riley,

My son and I are mountain bikers that use the Spencer Trails regularly during the summer months. This is a very important trail system to the mountain biking community and attracts riders for all over the state and beyond. While I have not had the opportunity to volunteer for trail work I instead am able to donate financially to the FAMB each year to help them fund the work they do to build and maintain the Spencer Trails. I realize that timber prices are at an all time high currently but it would be a priceless benefit for the mountain biking community to have the Spencer Trails open during the peak summer months of July and August. I would hope that the DNRC consider this when planning their timber operations. I would also hope that the DNRC considers the extensive volunteer hours and funding that has gone into this trail system and take every consideration possible to protect the trails from damage during the timber operations. If the trails have to be closed during the peak summer months for the timber operations and any subsequent repairs that are needed I would respectfully ask that the DNRC consider a pro rata refund for the FAMBs annual SRUL fee to help fund anticipate trail repairs. The partnership between the DNRC and the FAMB is truly a model for the mountain biking community both in Montana and across the country and my son and I certainly appreciate and respect everything that you do to support this partnership. Best,

Mike & Ryan

Comment Letter 21

Hello

My name is Steve B. I understand that there is a salvage operation going to happen at the Spencer trailhead, we as mountain bikers really enjoy the time we spend there on the trails. I find myself going there after work, to get on couple of laps.
Would it be possible to schedule the salvage operation later in the summer? And if not how about prorating the SRUL fee to save the club some hard to come by money. The club and its members have worked hard on building the terrain there, it would be great if the logging workers would Tread lightly as possible.
Thanks for your time.

Comment Letter 22
To whom it may concern,

I am writing to express my concern for the mountain bike trails at Spencer. I love mountain biking and my time for this activity is limited these days due to having two little kids. Spencer is a place that I can get to quickly and do a shorter (fun all mountain) ride. Please do what you can to limit the damage to these trails and limit the time these trails are unusable. I know these trails mean so much to so many people.

Cayla Erslev
Whitefish, MT

Comment Letter 23

Hi Riley,

Melissa Rees writing to you here as a long time Whitefish local and avid trail user, both by foot and by mountain bike. I have frequented the Spencer Trails often and they are some of my favorites in the area. These trails are easily accessible, well cared for and allow me to be immersed in some incredible landscapes. Also, as a mountain biker, they allow me to hone in on my skills, as the trails vary in ability and features. The Spencer trail system is highly important to me as a part of my frequently visited public land use.

As a lifelong Montana resident, I understand that logging can be a useful and, when executed well, beneficial process not only to the profit of a company, but also to the land. I implore you to have not only monetary value in mind, but also the health of the forest, the trails and the animals and people who are a part of this community. As I am sure you are aware, our summer months here are short and time for potential trail usage even shorter. If this project is to happen before the fall, it is my hope that you will do all you can to keep the length of trail closures to a minimum to allow public use of the trails to resume within a respectable time frame.

It is also highly important to me that you keep the impact on the land and trails minimal. This includes trails, features and the trailhead and in good faith I hope you heed FAMB’s feedback on the placement of your skid trails. Please, as we understand that logging is a part of public land life, I hope you understand and respect the public value of keeping these trails as accessible and undamaged as possible.

I stand with FAMB and all of its requests on the issue of the logging event planned on Spencer and I, a part of the Whitefish community and frequent user of the public trail systems, hope that you honor their requests.

Thank you for your time.

Sincerely,
Melissa Rees

Comment Letter 24

Hi, I am a mountain biker who rides often at the Spencer Trails. As one of two highly technical trails in the area it is very important to me to be able to ride the trails at Spencer as much as I can.

I have helped out on multiple trail build/dig days at Spencer, and even with only mountain bikers using the trails it could be a full time job to maintain those trails. I would like to request that the DNRC make an effort to limit the time and
extent of trail and trailhead closures so that we as riders can use the trails. I would also request that the DNRC do everything in it's power to limit damage to existing trails during the salvage operation. This includes the trails, trailhead, and features that have been built on the mountain already.

I also support FAMB's request for a refund or credit on its SRUL fee in a pro rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.

I understand the need to salvage the downed trees that are covering the mountain, and I hope that FAMB, the DNRC, and the users of the trails themselves can all find an agreeable method and time period for that effort.

Thanks,
Thomas Sebby

Comment Letter 25

I've recently heard about logging, and trail closure at Spencer Mountain this summer. I'm concerned as this is a very popular trail system near Whitefish, and something visitors to the area will expect to have access to.

I'm asking for consideration of the time and impact on the community of users, as well as FAMB, and the Whitefish Legacy Partners, who put in time and money to build and maintain the trails and facilities. Their budgets are tight, and as a contributor and user of both organizations and all the trails in the area (they're the reason we live here), and a pro-rated refund of the SRUL fee would be extremely helpful.

Thanks for your consideration.

Kevin Bauman

Comment Letter 26

Hi Riley,

I am an avid user of Spencer Mountain. Mostly I mountain bike but I do occasionally hike the trails as well. Although I am not opposed to logging and understand the nature of the State Trust Lands, I am deeply concerned about this new project and the effect it will have on the trails. FAMB has spent a lot of time and money on these trails which are used by locals and tourists alike. I ask that you please respect the suggestions FAMB has made to you. I also request you please limit the time and extent of trail and trailhead closures. I feel like the timing would be better served for the community with a fall project.

I would hope the DNRC will do everything in its power to ensure the salvage operator avoids damage to trails, features, and the trail. A lot of money and volunteer time has been spent on Spencer. I also support FAMB's request for a refund or credit on its SRUL fee in a pro-rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.

Thank you,

Pete
Comment Letter 27

Hey Riley,

My name is John, I'm a 32-year-old mountain biker who is lucky enough to call Whitefish MT my home. A staple to that fortune is the spencer mountain bike trail system. My wife and I spend 50+ days a year on those trails, it has been a key contributor to our fitness and our skillset. She in fact won the silver mountain DH NW CUP race last year for Cat 2 + 30 women.

We understand the need for logging and the money generated from it, but we would like to request that process respects the trails that could be affected by this process. That request it to respect them in the most possible way.

Please do everything in your power to protect this staple of our community. The sense of community spencer provides is simply unquantifiable. From teaching our youth the rewards of hard work from trail building to the endless smiles the two wheels bring us in that park on a daily basis. Spencer is something absolutely special. Please understand the deep love, and passion we mountain bikers have for what is there.

I support FAMB’s request for a refund or credit on its SRUL equal to the closure.

Most importantly please do everything to not ruin the hard work. Spencer is a part of our community that bond’s us as one unit. There are a lot of things that drive people apart today. We are lucky to have spencer to remind us that we Montanans are hardworking, wild, humble, and most importantly respectful of each other and nature.

Thank you,

John Polaris

Comment Letter 28

Dear Riley,

My family is an avid mountain biking family. My husband was building trails on Spencer long before FAMB came around. Now as our seven year old is riding the trails at Spencer we are really looking forward to this summer. Not only are they amazing trails, but the community you meet while out there is encouraging. In this time of uncertainty and change and nothing being normal...the trails are. I love being able to take my daughter out and watch her be a kid on her bike in the woods.

I know how important the lumber sale is, I’m just asking that you postpone until after summer. I am asking that the DNRC do everything within its power to ensure that the salvage operator avoid damage to trails, features, and the trailhead, including honoring FAMB’s feedback on placement of skid rows. I also support FAMB’s request for a refund or credit on its SRUL fee in a pro rata amount equal to the extent of the closure and any subsequent closures required due to unsafe trail conditions after the project is complete.

Thank you for your time.

-Anna Danley
Comment Letter 29

Hi there Riley,

My name is Ricky. I am a resident of Whitefish and an avid mountain biker. I love the trails up at Spencer Mountain and would hate to see them closed for the height of MTB season.

After last year and the stress of the pandemic, folks are more excited than ever to get outside and get back to real life. Spencer Mountain is an absolute gem of Whitefish for both local and traveling MTB tourists. I understand the value the DNRC sees in the down lumber on site however, I see no reason the sale cannot wait until the fall after?

Having volunteered with the FAMB group on multiple occasions helping maintain the trails at Spencer Mountain, I would hate to see our efforts go to waste. Again, this year in particular I think is extra special for the residents and bikers of the Whitefish area. :)

If possible, we'd love to see the DNRC limit the time and extent of trail closures, and if possible, postpone the lumber sale until fall.

Appreciate your consideration!

Best,

-Ricky

Comment Letter 30

Riley,

I am a local mountain biker, hiker, member of FAMB and utilize the Spencer Trail system. I am requesting that the DNRC make efforts to limit the time and extent of Trail and traffic closures. My co-worker and great friend, Matthew Gilman, passed away in a tragic accident on Big Mountain this past February. Friends, co-workers and family members donated to FAMB so we could sponsor a trail sign to honor his memory (which is at the top of Recess Trail). We have hiked up on his birthday and other times stopped while biking to see the sign, pay our respects and feel close to his memory. It would impact a lot of us to have the trail system closed.

I'm also asking that the operator avoids damage to Trails features and trailhead. I support the Flathead area mountain biking association's request for a refund or credit on its fee due to the closure.

Thank you for your time and consideration,

Monica Preisendorf
Comment Letter 31

Riley and DNRC,

As local Spencer Mountain trail user (for 22 years and counting) and FAMB Member, I was disappointed to read that DNRC is proposing to log during mid-summer and close access to trails. Spencer is a very popular recreation area, and has extremely high use spring, summer and early fall. I know FAMB has worked incredibly hard at building and maintaining these trails through private fundraising efforts, and pay DNRC fees to maintain and use the trails, while also building and maintaining the trailhead and facilities. I strongly urge you to delay your logging event to a less popular recreation time at Spencer like late fall/early winter. I also hope when the logging event occurs that you work directly with FAMB to preserve as much of the trails as possible and make sure the trailhead and access is equal to or greater than it currently exists. SO much hard work, paid and volunteer, has been dedicated to this area, making it an incredible asset to recreation in our community for all ages. Furthermore, I assume you will provide FAMB a refund or credit for fees paid to DNRC for the time that recreational use is prohibited during logging, and also extend that credit into the future to account for time that access and trails will be closed due to rehabilitation after the logging event. Please honor your relationship with our community and FAMB and make this a limited impact event, and please consider the timing and the impact on prime recreation use. Thank you for your time and for working closely with our community and FAMB.

Sincerely,
Courtney Feldt
FAMB Member and local trail user

DNRC Response to Comment Letters 1-31

Thank you for your participation in the implementation of this project. We are working to make this a collaborative process that reflects our commitment to the terms established in Special Recreational Use License #NWLO-RU3-153, which was granted to the City of Whitefish as an authorization to maintain designated trails on and around Spencer Mountain. This authorization of recreational use is a secondary use on classified forest land and does not take precedent over the DNRC’s mandate to manage timber resources on classified forest land. We plan to address concerns regarding the minimization of impacts to the licensed activities, timing of the harvest operations, and SRUL fee refunds within the scope of the terms in the SRUL.

The DNRC intends to minimize impacts to authorize trails to the greatest extent practical without compromising our mandate to maximize revenue through the management of timber resources. We acknowledge the terms in section 7 of the SRUL as an inclusion of the City of Whitefish to participate in the MEPA process to develop solutions to minimize impacts caused by resource management activities. In addition to working with the City of Whitefish, FAMB, and WLP in the public comment process, the DNRC project lead will work with FAMB to identify high-value trail features that will be avoided by equipment to the greatest extent possible. During the harvest operations, the project lead will work with the logging contractor to minimize the number of trail crossings and skid trail width. Impacts to the trail are not wholly avoidable, but the DNRC project lead will incorporate contractual terms to ensure that the contractor will “take reasonable precautions within the scope of the logging process to avoid unnecessary damage within the trail corridor”, as stated in section 26 of the SRUL. Contractual terms will be implemented to require a mutual agreement of skid trail location, orientation, and frequency between the operator and DNRC project lead. The contractor will be prohibited
from skidding down licensed trail corridors. The DNRC project lead will also strive to minimize impacts to the license area by maintaining road widths to an average of 14 feet, stipulating slash dispersal on skid trails that may encourage off-trail use, and implement Montana Forestry Best Management Practices to ensure proper road drainage and grass seeding post-harvest. The contractor will be contractually obligated to avoid and protect License improvements including vault toilets, kiosks, signs, trash cans, and landscaping boulders. The running surface of the trailhead parking lot will be improved to preharvest conditions. Noxious weed propagation will be monitored in the years following operations and will be addressed as needed. Such contractual terms will not include specific, quantified standards for trail crossing frequency, orientation, width, or no-work zones, as these set-in-stone standards would make various scenarios operationally impractical, or cause excessive sidehill yarding of logs; a practice that is more impactful to soils than conventional practices. Additionally, stipulating the use of excessive sidehill yarding of logs will incur more cost on the purchaser, thereby reducing the revenue generated for the Trust Beneficiaries.

During operations that require access via the Twin Bridges trailhead, a closure of the trailhead will be imposed by the DNRC for a maximum of 30 days. This closure will be implemented due to public safety concerns. The City of Whitefish, FAMB, and WLP will be notified as soon as possible when timing of operations is known. No use of trails will be permitted within the project area at any time during the closure period. All trails within harvest units and haul routes will be closed due to potential hazards on and around trails. The DNRC plans to implement the salvage operation as soon as possible and is not obligated by the SRUL terms to delay the project. Various factors contribute to the urgency of implementing this project including the need to maximize the length of the operating period for prospective purchasers, minimize wood degradation, mitigate propagating insect infestations, and reduce fire hazards. The DNRC is mandated by laws, rules, and agency mission to conduct timber salvage in a timely fashion, and it would be contradictory to agency obligations to allow a secondary use to take precedence over the primary use by altering the timeline of the project.

The DNRC will follow the terms of the SRUL while addressing the matter of pro-rata reductions in SRUL fees. As per the SRUL, the City of Whitefish is only entitled to a reduction on pro-rata basis for the Acreage Fee, which encompasses parking areas and trail head amenities, as stated in section 4 (C). Any additional refunds to the City of Whitefish that exceed the SRUL terms would be an undue reduction in revenue to the Trust Beneficiaries.

Comment Letter 32

Dear Mr. Stevenson,

This letter is in support of the Spencer Mountain Blowdown Salvage Permit proposal. The project description outlined in your Initial Proposal letter describes the need for the project and the methods to achieve the desired future condition. Fuels reduction, forest health improvement, and the sale of forest products are critical for school trust lands. Weyerhaeuser operates three manufacturing facilities located in Northwest Montana and employs over 550 people. Logs from Department of Natural Resource and Conservation projects are an important source of raw materials for our operations. Specifically, the opportunity to purchase logs produced from the Spencer Mountain Blowdown Salvage Permit is important to our fiber supply to help sustain our manufacturing businesses.

Weyerhaeuser hopes that any decision made regarding the implementation of this project will consider its importance to our employees and their respective communities.

Thank you for your consideration.

Sincerely,

Jared Richardson, CF
Montana and East Region Raw Material Manager
DNRC Response

Thank you for your comment and support for this project.

Comment Letter 33

It is critical that this timber salvage be completed for fire mitigation and beetle damage control. We support it 100%!

Scott and Joni Foster
Bootjack Lake

DNRC Response

Thank you for your comment support for this project.

Comment Letter 34

We agree with the need for the project to happen. Weather forecasts call for a dry hot summer though and I am concerned about a logging operation taking place in July/August here on Spencer Ridge. Hot dry days and gusting winds will create a landscape for high fire danger...We who live below the mountain will not see a fire until it sweeps down the hill. I know, you want to take some fire prevention steps, but it is all for naught if the logging operation equipment starts a fire. Are they going to follow protocol for shutdown at noon to resume later in the day? That will create a snag with Whitefish Legacy. I think there is a need for more information and We need to know what the specialists think.... And, on a side note, with the daily traffic jam in Whitefish, how long would it take for the WFD to respond to smoke from the mountain? Would not late fall be a consideration? Thank you for keeping us informed. Bonnie and Dan Hodges

DNRC Response

The DNRC must abide by all Laws and Administrative Rules pertaining to harvest operations on classified forest lands during the legal Forest Fire Season between May 1st and September 30th. Logging contractors are required to adhere to various mitigations while operating on State Trust Lands. The DNRC will not limit operations to occurring in the fall for the reasons stated in the response to comments 1 through 31, so long as all laws a regulations are followed during fire season.

All internal combustion engines must be equipped with an approved and effective spark-arresting system, as established in the National Wildfire Coordinating Group’s Spark Arrester Guides. Chainsaw operators shall carry a fully charged and operable fire extinguisher, minimum-capacity 8-ounce liquid or 1-pound dry chemical, with a 4BC or higher rating. Vehicles and equipment, mobile or stationary, with a combustion engine/motor used for commercial, ranching, or industrial activities must have one operable, dry-chemical fire extinguisher with a minimum 2-1/2-pound capacity and 4BC or higher rating. Chainsaw operators shall maintain one usable shovel at chainsaw-fueling sites. It is required for all industrial activities to have one usable shovel or pulaski with each vehicle and equipment with an internal combustion engine/motor, mobile or stationary. One backpack pump is required with each vehicle and with any equipment, used off
road, mobile or stationary, with an internal combustion engine/motor, that cannot be used to build fireline and is being operated on combustible material.

In areas designated by public proclamation by the administrator, division of forestry, as areas of high fire hazard, the administrator may request all persons, firms, or corporations present or engaged in any activity in the areas to voluntarily cease operations or to adjust working hours to less critical periods of the day. In the event such a request is refused, the administrator may issue a written order directing compliance. When fire danger reaches extreme levels that cause operations to be curtailed through Stage II, Hoot Owl requirements or other measures, the State may suspend operations until fire conditions in and/or around the sale area improve. During periods of dangerous fire conditions, no person may enter or be upon those forest lands designated by public proclamation by the governor of the state of Montana as areas of dangerous fire hazard except under written permit issued by a recognized agency.

Comment Letter 35

I support subject timber sale. It’s a win-win for everyone.

Regards,
Roger Sievers

DNRC Response

Thank you for your comment and support for this project.

Comment 36 via Phone Call

Stuart Swenson:

Concerns were expressed regarding fire hazards during harvest operations. This individual inquired about when logging operations may be restricted during fire season, and what mitigations would be implemented during the operation. This individual also inquired about noxious weed management following operations.

DNRC Response

For inquiries regarding fire hazard mitigation, please see response to comment 34.

DNRC plans to mitigate the proliferation of noxious weeds through herbicide application on road surfaces and adjacent disturbed areas. All equipment would be washed and inspected prior to the beginning of the harvest operations. Areas that are disturbed through road maintenance will be reseeded with site adapted grass to mitigate noxious weed spread. Roads and harvest units will be monitored for noxious weeds after harvest operations are complete and herbicides will be applied as necessary.