Environmental Assessment Checklist

Project Name: Comers Butte Timber Sale
Proposed Implementation Date: 09/2026
Proponent: Helena Unit, Central Land Office, Montana DNRC
County: Cascade

Type and Purpose of Action

Description of Proposed Action:

The Helena Unit of the Montana Department of Natural Resources and Conservation (DNRC) is proposing the Comers Butte Timber Sale. The project is located northeast of Belt, MT (refer to Attachments vicinity map A-**1** and project map A-**2**) and includes the following sections:

Beneficiary	Legal Description	Total Acres	Treated Acres
Common Schools	**19N 8E 16**	**640**	**78**
Public Buildings			
MSU 2nd Grant			
MSU Morrill			
Eastern College-MSU/Western College-U of M			
Montana Tech			
University of Montana			
School for the Deaf and Blind			
Pine Hills School			
Veterans Home			
Public Land Trust			
Acquired Land			

Objectives of the project include:

- Generate Revenue for the Common Schools Trust.
- Improve forest health and vigor by removing trees in declining health from insect and disease infestations.
- Create a multiage forest that will be less susceptible to future insect and disease outbreaks.
- Reduce fuel loading and related wildfire risk.

Proposed activities include:

Action	Quantity
Proposed Harvest Activities	# Acres
Clearcut	
Seed Tree	
Shelterwood	62
Selection	
Old Growth Maintenance/Restoration	
Commercial Thinning	
Salvage	
Overstory Removal	16
Total Treatment Acres	**78**
Proposed Forest Improvement Treatment	# Acres
Pre-commercial Thinning	
Site preparation/scarification	
Planting	**70**
Proposed Road Activities	# Miles
New permanent road construction	0.82
New temporary road construction	
Road maintenance	0.56
Road reconstruction	0.29
Road abandoned	
Road reclaimed	
Other Activities	

Duration of Activities:	3 years
Implementation Period:	Year round when soil conditions allow, and as approved by the Forest Officer.

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),
- and all other applicable state and federal laws.

Project Development

SCOPING:

- DATE:
  - 01/29/2026 – 03/02/2026
- PUBLIC SCOPED:
  - The scoping notice was posted on the DNRC Website: https://dnrc.mt.gov/News/scoping-notices
  - The scoping notice was sent to adjacent landowners, the lessee for this parcel, and posted on the DNRC website.
- AGENCIES SCOPED:
  - USFS, FWP, and Montana Tribal Agencies
- COMMENTS RECEIVED:
  - How many: 2
  - Concerns: 3. Concern 1: The concern was about protecting fences on the property lines. Concern 2: Visual Aesthetics was a concern for a neighboring landowner and how the proposed timber harvest may impact their viewscape. Concern 3: The concern was that the southern most proposed harvest unit is used by elk and moose throughout the year, and if it was thinned to hard or clearcut it would negatively impact the wildlife that use that area throughout the year.
  - Results: For Concern 1, a map of the proposed harvest units was provided to the commentor, and an explanation of what would occur in the event a fence was damaged during the timber sale and how it would be repaired by the successful bidder at their own cost as soon as possible. The other two concerns have been analyzed in this Environmental Assessment (EA) Document.

DNRC specialists were consulted, including: Jeff Schmalenberg (Science Program Manager), Patrick Rennie (Archeologist), & Kyle Harrington (DNRC Service Forester).

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.)*

- **United States Fish & Wildlife Service-** DNRC is managing the habitats of threatened and endangered species on this project by implementing the Montana DNRC Forested Trust Lands HCP and the associated Incidental Take Permit that was issued by the United States Fish & Wildlife Service (USFWS) in February of 2012 under Section 10 of the Endangered Species Act. The HCP identifies specific conservation strategies for managing the habitats of grizzly bear, Canada lynx, and three fish species: bull trout, westslope cutthroat trout, and Columbia redband trout. This project complies with the HCP. The HCP can be found at https://dnrc.mt.gov/TrustLand/about/planning-and-reports.

- **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 2010). As a member, DNRC must submit a list of planned burns to the Airshed Group's Smoke Monitoring Unit describing the type of burn to be conducted, the size of the burn in acres, the estimated fuel loading in tons/acre, and the location and elevation of each burn site. The Smoke Monitoring Unit provides timely restriction messages by airshed. DNRC is required to abide by those restrictions and burn only when granted approval by the Smoke Monitoring Unit when forecasted conditions are conducive to good smoke dispersion.

- **Montana Department of Fish, Wildlife and Parks (DFWP)-** A Stream Protection Act Permit (124 Permit) is required from DFWP for activities that may affect the natural shape and form of a stream's channel, banks, or tributaries. Such activities include:
    - The proposed Comers Butte Timber Sale would require new road construction with one stream crossing on Big Willow Creek to access the timber sale area. The drainage area above the proposed crossing on Big Willow Creek was calculated to determine an appropriate culvert size. DNRC applied for a 124 Permit as a part of the Comers Butte Timber Sale Package.

ALTERNATIVES CONSIDERED:

No-Action Alternative: The No-Action Alternative would result in the Comers Butte Timber Sale not occurring. No timber would be harvested from this parcel, and no revenue would be generated for the Common Schools Trust.

Action Alternative: Under the Action Alternative a commercial timber harvest would occur on 78 acres, removing approximately 698 MBF of sawtimber. Conventional ground-based equipment would be used to harvest timber resources.

A shelterwood prescription would apply to 62 acres that would leave an estimated volume of 60 Basal Area Factor (BAF) per acre. An overstory removal prescription would apply to 16 acres and would leave a younger stand of advanced regeneration.

Under the Action Alternative 0.82 miles of new road with one stream crossing would be constructed. Additionally, 0.56 miles of road maintenance and 0.29 miles of road reconstruction would occur.

Post harvest under the Action Alternative, tree planting and noxious weed management may occur.

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: The existing conditions of this section are upland grass habitats, aspen stands, and conifer forests. There were two previous timber harvest entries on this section, with the largest entry occurring in 1992 and a second salvage harvest in 2009. The proposed timber sale area for Comers Butte Timber Sale is comprised of two types of Douglas-fir stands. The units designated as Shelterwood Harvest Units are mature even aged stands of Douglas-fir. The units designated as Overstory Removal Harvest Units are multi-age stands of Douglas-fir that have 2-3 age classes present.

Harvest Unit	Habitat Group	Fire Regime	Current Cover Type	Age Class (years)	DFC	RX	Acres
1	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	28
2	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	40-99	Douglas Fir	Overstory Removal	15
3	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	29
4	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Overstory Removal	1
5	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	.5
6	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	.25
7	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	1
8	Cool and moist (eastside)	Low-to-mixed	Douglas Fir	100-149	Douglas Fir	Shelterwood Harvest	3

Fire Hazard/Fuels: The project area is comprised of mature even age Douglas-fir in the Shelterwood Units and multi-age stands within the Overstory Removal Harvest Units. There are areas of standing dead and down trees within and adjacent to the Timber Sale Boundary. Areas of dead and down trees are currently difficult to traverse through on foot. The dead trees are a result of previous insect and disease infestations.

Insects and Diseases: There is evidence of insects and diseases throughout the project area and the remainder of this parcel. Mature trees appear to be the most impacted by these issues. There are numerous locations in the project area where groups of trees have died. Some of these pockets of dead trees likely occurred in the mid 2010's. It is unclear whether tree mortality was directly caused by root rot or a beetle infestation.

Sensitive/Rare Plants: An environmental summary for the timber sale area was created on the Montana Natural Heritage Program website for the proposed project area. No threatened or

endangered plant species were identified. A plant species of concern that may occur near the project area is Marsh Horsetail and Acuminate Dung Moss.

Noxious Weeds: Noxious weeds are present on this State parcel. Hound's-tongue, spotted knapweed, and some Canada thistle can be found on this section. This section is actively grazed by cattle.

Vegetation	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Current Cover/DFCs	**x**				**x**				**x**					
Age Class	**x**				**x**				**x**					
Old Growth	**x**				**x**				**x**					
Fire/Fuels		**x**				**x**				**x**			**no**	**1**
Insects/Disease		**x**				**x**				**x**			**no**	**2**
Rare Plants	**x**				**x**				**x**					
Noxious Weeds	**x**				**x**				**x**					
Action														
Current Cover/DFCs		**x**				**x**				**x**			**yes**	**3**
Age Class		**x**				**x**				**x**			**no**	
Old Growth	**x**				**x**				**x**					
Fire/Fuels		**x**				**x**				**x**				
Insects/Disease		**x**				**x**				**x**				
Rare Plants		**x**				**x**				**x**			**yes**	**4**
Noxious Weeds		**x**				**x**				**x**			**yes**	**5**

Comments:

1. Fuel loading will continue to increase over time if a timber harvest does not occur. This will result in an elevated risk of wildfire.
2. Insect and disease issues will continue to impact existing stands of mature timber.
3. The current stands are currently comprised of Douglas-fir as the dominant tree species and the Desired Future Condition (DFC) of the proposed harvest area is Douglas-fir stand. Ground disturbance from harvesting could promote establishment of aspen and hardwood brush species, but post-harvest planting of Douglas-fir would increase the likelihood of maintaining the Douglas-fir cover type.
4. The Montana State Library website was used to produce a Species of Concern list for the proposed project area. Neighboring land was also included in the report. Rare plants that may be within the project area are Marsh Horsetail (Equisetum palustre) and Acuminate Dung Moss (Tayloria acuminata). Both species, if present would occur in wet or moist areas. The proposed timber sale will avoid wet and moist areas, and best management practices will be used to create a buffer along any streams or isolated wet lands that are near the proposed project boundaries.

5. Noxious weeds are present on this parcel of State land, and this parcel is actively grazed by cattle. Soil disturbance from timber management activities may propagate the spread of weeds within the project area.

Vegetation Mitigations:

- Mitigation measures for noxious weed control include washing equipment before entering the site and applying grass seed on disturbed soil from road construction activities. Post harvest, for a period of three years the DNRC will need to monitor and mitigate the spread of noxious weeds within the project area and haul routes that were used in this section.

SOIL DISTURBANCE AND PRODUCTIVITY:

Soil Disturbance and Productivity Existing Conditions: Soils in the project area are derived from residuum and alluvium parent materials and typically range from loam to silty clay loam in texture. Upland soils are generally deep, well drained, and low in coarse fragments. Because of their relatively high clay content, these soils are susceptible to rutting and compaction when heavy equipment is operated during wet conditions. Soils have low base erosion rates.

The project area supports moderately productive forest sites due to elevated precipitation, soil moisture holding capacity and favorable northernly aspect.

Evidence of past slope instability was observed throughout the project area and is consistent with instabilities found in landscapes with similar residual and alluvial soils. No slope instability was observed in areas of proposed harvest or new road construction. No evidence of recent slope movement or failure was observed in the project area.

Soil Disturbance and Productivity	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Physical Disturbance (Compaction and Displacement)	**x**				**x**				**x**				**N/A**	
Erosion	**x**				**x**				**x**				**N/A**	
Nutrient Cycling	**x**				**x**				**x**				**N/A**	
Slope Stability	**x**				**x**				**x**					
Soil Productivity	**x**				**x**				**x**					
Action														
Physical Disturbance (Compaction and Displacement)		**x**			**x**					**x**			**Y**	**1**
Erosion		**x**				**x**				**x**			**Y**	**2**
Nutrient Cycling	**x**				**x**				**x**				**Y**	**3**
Slope Stability	**x**				**x**				**x**				**Y**	**4**
Soil Productivity		**x**			**x**				**x**				**Y**	**5**

Comments:

1. Existing detrimental soil disturbance for forest management activities was ocularly estimated using professional judgement at approximately 10% based on previous harvest systems, harvest intensity and soil monitoring results of similar soil and project types. Reusing existing skid trails and line corridors would minimize the extent of new disturbance and would likely limit detrimental disturbance to under 20% of the harvest area. Low levels of detrimental disturbance from cattle grazing were observed which is expected to continue until grazing management is precluded.
2. Low levels of soil erosion were observed along cattle trails and around water features from stream bank trampling. Road surfaces and historic skid trails were erosively stable. There is a low probability of intense precipitation events occurring during project implementation that would limit the effectiveness of BMPs. Buffers in the project area have been unmanaged and would provide effective sediment delivery filtration if such an event occurred. As a result, there is a low risk of low-level effects of erosion from implementing the action alternative.
3. Coarse woody debris retention of 5-10 tons/acre would provide mitigation for nutrient budget impacts. Snag and snag recruitment would also provide long-term large wood recruitment to facilitate microsite creation, moisture retention and soil organic matter accumulation. Effects are forecasted to be low with no indirect or cumulative effects expected.
4. Slope stability is largely mitigated by avoidance of unstable slopes and landforms. Through avoidance, the risk of the proposed actions to slope stability is low.
5. Existing soil productivity within the project area is low to moderate dependent on aspect and proximity to shallow groundwater sources. The soil mitigations provided below and standard forest management BMPs have demonstrated to provide adequate soil protection so that 80% of the soil resource in the project area would remain intact, porous, and productive. Though some detrimental disturbance (<20%) is inevitable when operating heavy equipment in the woods, there is low risk of low-level effects to long-term loss of soil productivity because of implementing the action alternative.

Soil Mitigations:

1. Limit equipment operations 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. 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 or reuse 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. Untethered, ground-based skidding should be limited to slopes of less than 45 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 and/or skidding from more moderate slopes of less than 40 percent.
4. Keep skid trails to 20 percent or less of the harvest unit acreage. Provide drainage on skid trails and roads concurrently with operations.
5. Slash disposal: Limit the combination of displacement and scarification to 30 to 40 percent of the harvest units. No dozer piling on slopes over 35 percent; no excavator piling on slopes over 40 percent, unless the operation can be completed without causing excessive erosion. Consider lopping and scattering or jackpot burning on the steeper slopes. Consider disturbance incurred during skidding operations to, at least, partially provide scarification for regeneration.
6. Retain 10-15 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 so that fine material accounts for approximately 30-40% of the total coarse wood material tonnage. Coarse woody debris retention may also be met through breakage during normal felling and skidding operations.

WATER QUALITY AND QUANTITY: The following physical attributes of the Big Willow Creek watershed provide rationale that supports the assumption that the proposed actions present a low risk of low-level cumulative watershed effects:

1. 47% of the upper basin of Big Willow Creek is forested. The proposed action is proposing to manage less than 10% of the forest cover (largely non-forested).
2. Mean annual precipitation is low at 24 inches per year (continental climate)
3. Average hillslope gradient in the basin is 25 percent with only 9% of the area steeper than 50% slope (low energy environment).

Water Quality and Quantity Existing Conditions:

The Big Willow Creek watershed is classified as B-1. Waters classified B-1 are to be maintained suitable for drinking, culinary, and food processing purposes, after conventional treatment; bathing, swimming, and recreation; growth and propagation of salmonid fishes and associated aquatic life, waterfowl and furbearers; and agricultural and industrial water supply. Big Willow Creek is a tributary to Belt Creek downstream of Belt, Montana. All identified beneficial uses are fully supported in Big Willow Creek.

The Big Willow Creek is a perennially, Class 1 stream under the Montana Streamside Management Zone law. This stream, as well as adjacent wetlands, will be provided with SMZ protection. Roads in the project area meet BMPs and are restricted to motorized public access to limit road maintenance requirements and maintain vegetated road surfaces.

No active sediment delivery from road surfaces was documented during field review. Chronic streambank trampling and riparian cattle trailing are causing ongoing, low-level sediment delivery to the stream, and this is expected to continue until grazing management practices are changed to prevent livestock access and use patterns that damage stream banks.

Water Quality & Quantity	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Water Quality	**x**					**x**				**x**				**1**
Water Quantity	**x**				**x**				**x**					**2**
Action														
Water Quality		**x**				**x**			**x**				**Y**	**3**
Water Quantity	**x**				**x**				**x**				**N/A**	**2**

Comments:
1. Livestock grazing would continue to occur under the existing grazing license. Streambank hoof shear and stream channel disturbance would occur at existing levels and would continue to occur at existing levels regardless of selection of the No Action or Action Alternative.
2. Forest stands are not likely to be a major influence on the hydrology and flow regimes of streams in the project area. Anticipated harvest levels would manage approximately 10 percent of the forested acres with even aged management. Considering this level of harvest and the existing condition of the watershed, in concert with implementing BMPs and streamside buffers, the action alternative is not expected to result in measurable effects on the timing, magnitude, or duration of peak flows in disconnected downstream receiving waters.
3. Due to harvest systems utilized, location and size of harvest units relative to stream channels, implementation of Forest Management BMPs, the low precipitation levels observed in the project area, there is a low risk of additional direct water quality impacts for the proposed actions. One new road-stream crossing would be constructed resulting in short-term, low magnitude water quality effects from turbidity. Considering these impacts in combination with past and current activities, the proposed action is not likely to elevate cumulative watershed effect beyond the existing condition.

Water Quality & Quantity Mitigations:
1. Best Management Practices for Forestry would be implemented and monitored for effectiveness concurrent with all forest management activities.
2. Implementation of Montana Administrative Rules for Forest Management and Streamside Management Zones.
3. Implement all requirements prescribed under the Montana Stream Protection Action permit for the culvert replacement.

FISHERIES:

Fisheries Existing Conditions: No fisheries are supported adjacent to the proposed activities. Downstream waters on Big Willow Creek supports a native warmwater fishery composed of Brassy Minnow, Fathead Minnow, Lake Chub, Longnose Dace, Northern Redbelly Dace and White Sucker. No salmonids have been detected in Big Willow Creek.

No-Action: No direct or indirect impacts would occur to affected fish species or affected fisheries resources beyond those described in Fisheries Existing Conditions. Cumulative effects

(other related past and present factors; other future, related actions; and any impacts described in Fisheries Existing Conditions) would continue to occur.

Action Alternative: All protections under the SMZ law would apply and all BMPs for forest management would be implemented. Due to the existing condition and mitigations incorporated into the action alternative, the effect to fisheries resources because of implementing the action alternative would be no different than those described under No-Action.

WILDLIFE:

Wildlife Existing Conditions:

The project area is comprised of both forested and unforested grassland habitat used by a variety of wildlife species. Forest habitat is dominated by both mature and regenerating Douglas-fir stands, with aspen stands also prevalent. The project area occurs along a forest-grassland ecotone that provides habitat for many native songbirds, raptors, big game species, and predators. Habitats transition to grasslands and badlands to the east and south of the project area, whereas to the north and west forested and montane grasslands of the Highwood Mountains become abundant. Forested stands make up approximately 66.6% (426 acres) of the project area and occur as naturally fragmented patches interspersed within small wetlands and grasslands. In general, unforested grasslands are present on drier, south and west-facing slopes, while north and east-facing slopes contain stands of Douglas-fir. Approximately 68 acres of harvest occurred in the project area between 1992 and 2009, resulting in more open forest conditions on 26 acres and regenerating pole-sized Douglas-fir on 42 acres. Numerous small to moderate-sized snags are found in forested portions of the project area. Coarse woody debris amounts are patchy in some locations due to the age of stands and past forest management. The year-round, open Willow Creek Road runs through the northern portion of the project area. An additional 1.6 miles of existing restricted road provide limited motorized access for occasional forest or grazing management access. Non-motorized public use of the project area is likely low except during the big game hunting season. The project area and surrounding cumulative areas are comprised of private grazing lands and the isolated Highwood Mountains, which are made up of similar wildlife habitats as the project area. Primary land management/owners in this area are the USDA Forest Service, private landowners, and Montana DNRC.

No-Action:

Under the no action alternative, none of the proposed vegetation treatments would occur. Thus, no direct, indirect or cumulative effects to habitat and associated species would be expected as a result of the proposed activities.

Action Alternative (see Wildlife table below):

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Threatened and Endangered Species														
Grizzly bear *(Ursus arctos)*		X				X			X				Y	1

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Habitat: Recovery areas, security from human activity														
Lynx (*Felis lynx*) Habitat: mosaics--dense sapling and old forest >5,000 ft. elev.	**X**				**X**				**X**				**NA**	**2**
Wolverine proposed Threatened *(Gulo gulo)*	**X**				**X**				**X**				**NA**	**2**
Sensitive Species														
Bald eagle *(Haliaeetus leucocephalus)* Habitat: Late-successional forest within 1 mile of open water	**X**				**X**				**X**				**NA**	**2**
Black-backed woodpecker *(Picoides arcticus)* Habitat: Mature to old burned or beetle-infested forest	**X**				**X**				**X**				**NA**	**2**
Black-tailed prairie dog (*Cynomys ludoviscianus*) Habitat: grasslands, short-grass prairie,	**X**				**X**				**X**				**NA**	**2**

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
sagebrush semi-desert														
Flammulated owl *(Otus flammeolus)* Habitat: Late-successional ponderosa pine and Douglas-fir forest	**X**				**X**				**X**				**NA**	**2**
Greater sage grouse (*Centrocercus urophasianus*) Habitat: sagebrush semi-desert	**X**				**X**				**X**				**NA**	**2**
Peregrine falcon *(Falco peregrinus)* Habitat: Cliff features near open foraging areas and/or wetlands	**X**				**X**				**X**				**NA**	**2**
Pileated woodpecker *(Dryocopus pileatus)* Habitat: Late-successional ponderosa pine and larch-fir forest	**X**				**X**				**X**				**NA**	**2**

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Fringed myotis (*Myotis thysanodes*) Habitat: low elevation ponderosa pine, Douglas-fir and riparian forest with diverse roost sites including outcrops, caves, mines		**X**				**X**			**X**				**Y**	**3**
Hoary bat (*Lasiurus cinereus*) Habitat: coniferous and deciduous forests and roost on foliage in trees, under bark, in snags, bridges		**X**				**X**				**X**			**Y**	**3**
Townsend's big-eared bat *(Plecotus townsendii)* Habitat: Caves, caverns, old mines	**X**				**X**				**X**				**NA**	**2**
Big Game Species														
Elk		**X**				**X**				**X**			**Y**	**4**
Whitetail	**X**				**X**				**X**				**Y**	**4**
Mule Deer		**X**				**X**				**X**			**Y**	**4**
Moose		**X**				**X**				**X**			**Y**	**4**

Comments:

1. The proposed project area lies 70 miles west of Non-Recovery Occupied Habitat associated with the NCDE grizzly bear Recovery Zone (Wittinger et al. 2002). Grizzly bears could potentially travel through the project area and utilize preferred riparian habitat, however appreciable use of the project area is unlikely. The proposed action would harvest approximately 74 acres (18.2%) of forested hiding cover within the project area. Habitat connectivity would be reduced on these 74 acres, however, forest patches in this landscape are relatively discontinuous and interspersed with grasslands. Preferred habitat associated with riparian areas and wetlands would not be harvested or altered. Approximately 0.8 miles of new, permanent restricted road would be constructed to access the harvest units and facilitate long-term access for fire/forest management. All roads would prohibit public motorized access, but some additional disturbance could occur. Temporary disturbance and removal of hiding cover would be additive to other past and ongoing projects in the vicinity of the project area. Given the scope and scale of the proposed activities, and relatively marginal habitat quality for grizzly bears combined with low likelihood of bear presence, adverse direct, secondary and cumulative impacts to grizzly bears as a result of this project are expected to be low to negligible.

2. This project area is either out of the range of the normal distribution for this species or suitable habitat is not present. Thus, no direct, secondary, or cumulative effects would be anticipated.

3. The proposed activities would directly affect approximately 78 acres of potential fringed myotis and hoary bat habitat. However, no fringed myotis bats have been observed or recorded within the Highwood Mountains and surrounding area. Hoary bats typically roost in tree foliage (Bachen et al. 2020) and if present they could be temporarily displaced by timber harvesting. Tree and crown closure reductions under the action alternative would likely improve habitat quality and the possibility of use by foraging bats in these stands by creating a more open understory. Potential disturbance would only be expected from late May through September, when hoary bats are in Montana. After the conclusion of activities, continued use of harvested areas by hoary bats would be anticipated. At least 2 large snags and 2 large snag recruitment trees per acre (>21 inches dbh, or largest size class available) would be retained and could provide potential roosting habitat.

4. The project area provides suitable habitat for mule deer, elk and moose during all seasons, including calving and winter range (DFWP 2008). Some use by white-tailed deer is also likely. Under the proposed action, 78 acres of forested habitat (18.3% of forest present, 12.1% of the project area) would have tree density and associated crown cover reduced by timber harvest, which could influence local use of the area by big game by a minor degree for several decades. Of these 78 acres, tree removal would impact approximately 59 acres with over 40% crown closure that likely provide thermal cover and snow intercept to ungulates. Relatively well-stocked stands providing potential thermal cover would remain on approximately 55 acres in the project area following the proposed harvest, although 18 acres are aspen stands that do not offer substantial

protection during winter conditions. Harvesting activities are unlikely to occur during the winter months under typical winter conditions. Hiding cover utilized by big game would be impacted by timber harvest on 74 acres, of which 62 acres would be removed by shelterwood treatments. Hiding cover would persist on 12 acres of overstory removal treatments, along with 344 total acres of hiding cover providing security for big game within the project area. New restricted road construction of 0.8 miles would not measurably increase long-term motorized disturbance in the project area; however short-term harvesting activities could temporarily displace big game species. Non-motorized human use and resulting disturbance to big game would likely increase due to new permanent road. A minor increase in mortality risk to big game during the fall hunting season would be expected. Across the larger cumulative effects analysis area, hiding cover and thermal cover would remain relatively abundant (56.2% and 31.2%, respectively). Given the location, relatively small size of the proposed activities, and habitat attributes found on the project area and surrounding area, minor adverse direct, secondary and cumulative effects to mule deer, elk, and moose would be anticipated.

Wildlife Mitigations:

- A minimum of two snags and two snag recruitment tree per acre, of the largest diameter class, would be retained. Cull live trees and cull snags would be retained where possible given human safety considerations.
- Following project work, existing and new restricted roads would remain closed to motorized public access.
- All applicable Administrative Rules for Forest Management and commitments in Montana's Forest Management Habitat Conservation Plan would be applied.

References:

Bachen, D.A., A. McEwan, B. Burkholder, S. Blum, and B. Maxell. 2020. Accounts of Bat Species Found in Montana. Report to Montana Department of Environmental Quality. Montana Natural Heritage Program, Helena, Montana. 58 p.

DFWP. 2008. Maps of moose, elk, mule deer, and white-tailed deer distribution in Montana. *In* Individual GIS data layers. Available online at: https://gis-mtfwp.opendata.arcgis.com/

MNHP. 2026. Natural Heritage Map Viewer. Montana Natural Heritage Program. Retrieved on April 23, 2026, from http://mtnhp.org/MapViewer.

Wittinger, W.T. 2002. Grizzly bear distribution outside of recovery zones. Unpublished memorandum on file at USFS, Region 1, Missoula, Montana.

AIR QUALITY:

Air Quality	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														

Air Quality	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Smoke	x				x				x					
Dust	x				x				x					
Action														
Smoke		x				x				x			yes	1
Dust		x				x				x			yes	2

Comments:

1. Air Quality may be impacted temporarily during the burning of slash piles generated by the proposed timber harvest. Burning within the project area would be short term and only conducted when conditions favor good to excellent smoke ventilation and dispersion as determined by the Montana DEQ and Montana/Idaho Airshed Group.
2. Dust from log hauling activities may occur during dry conditions. There are no homes located near the proposed haul routes within this section.

Air Quality Mitigations:

- Only burn on approved days by the Montana/Idaho Airshed Group and DEQ.
- Conduct test burn to verify good smoke dispersion.
- Dust abatement strategies such as time of haul, mag chloride or other dust abatement applications may be applied on some road segments depending on seasonal conditions, level of traffic, and as determined by the Forest Officer.

ARCHAEOLOGICAL SITES / AESTHETICS / DEMANDS ON ENVIRONMENTAL RESOURCES:

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Historical or Archaeological Sites	x				x				x					
Aesthetics	x				x				x					
Demands on Environmental Resources of Land, Water, or Energy	x				x				x					
Action														
Historical or Archaeological Sites	x				x				x					1
Aesthetics	x				x				x					
Demands on Environmental	x				x				x					

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Resources of Land, Water, or Energy														

Comments:

1. Scoping letters were sent to those Tribes that requested to be notified of DNRC timber sales. No response was returned that identified a specific cultural resource issue. 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 results revealed that no cultural or paleontological resources have been identified in the APE, but it should be noted that Class III level inventory work has not been conducted there to date. Proposed timber harvest activities are expected to have *No Effect* to *Antiquities*. 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.

Mitigations: 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.*

- There are no known other environmental documents pertinent to this area.

Impacts on the Human Population

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

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Health and Human Safety	x				x				x					

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Industrial, Commercial and Agricultural Activities and Production	x				x				x					
Quantity and Distribution of Employment		x			x				x				no	1
Local Tax Base and Tax Revenues		x			x				x				no	1
Demand for Government Services	x				x				x					
Access To and Quality of Recreational and Wilderness Activities	x				x				x					
Density and Distribution of population and housing	x				x				x					
Social Structures and Mores	x				x				x					
Cultural Uniqueness and Diversity	x				x				x					
Action														
Health and Human Safety		x				x			x				yes	2
Industrial, Commercial and Agricultural Activities and Production	x				x				x					
Quantity and Distribution of Employment	x				x				x					
Local Tax Base and Tax Revenues	x				x				x					
Demand for Government Services	x				x				x					
Access To and Quality of Recreational and Wilderness Activities		x				x			x				yes	3
Density and Distribution of population and housing	x				x				x					
Social Structures and Mores	x				x				x					
Cultural Uniqueness and Diversity	x								x					

Comments:

1. No-Action Alternative would result in the loss of an employment opportunity and taxable transactions within Cascade County for the duration of the proposed project.
2. In the Action Alternative, Health and Human Safety could be a risk if people are recreating on State land did not stay a safe distance away from active timber harvest operations.
3. There will be short-term interruptions to recreation on portions of this parcel when timber management activities are occurring.

Mitigations:

- In order to warn the public of timber management activities, there will be multiple warning signs placed along the Willow Creek Road on State land and at the entrance of the new proposed road into this section.
- The proposed timber sale is a total of 78 acres out of 640 acres on this section. When the sale is active only a portion of that 78 acres will have activity occurring. This will allow for members of the public to disperse on the remainder of the State section and avoid being near active timber management operations.

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.*

- None

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 at this time.

Action: The timber harvest would generate additional revenue for the Common Schools Trust. The estimated return to the trust for the proposed harvest is $44,240 based on an estimated harvest of 698 thousand board feet (4,424 tons) and an overall stumpage value of $10 per ton. 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

DNRC 1996. State forest land management plan: final environmental impact statement (and appendixes). Montana Department of Natural Resources and Conservation, Forest Management Bureau, Missoula, Montana.

DNRC. 2010. Montana Department of Natural Resources and Conservation Forested State Trust Lands Habitat Conservation Plan: Final EIS, Volume II, Forest Management Bureau, Missoula, Montana.

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

Environmental Assessment Checklist Prepared By:

Name: Brian Krott
Title: Trust Land Forester
Date: 03/25/26

Finding

Alternative Selected

Upon Review of the Checklist EA and attachments, I find the proposed Action Alternative meets the intent of the project objectives, as stated in Section I – Type and Purpose of Action, address the public comments received during scoping, and complies with DNRC SFLMP and HCP, forest management ARMs, and all pertinent environmental law.

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

For these reasons and on behalf of DNRC I have selected the Action Alternative to be implemented on this project.

Significance of Potential Impacts

I have concluded that all impacts to the physical and human environment have been identified and addressed in this Checklist EA and its attachments. I find that mitigations, controls, and project design features, recommended by resource management specialists, have reduced adverse impacts to insignificance.

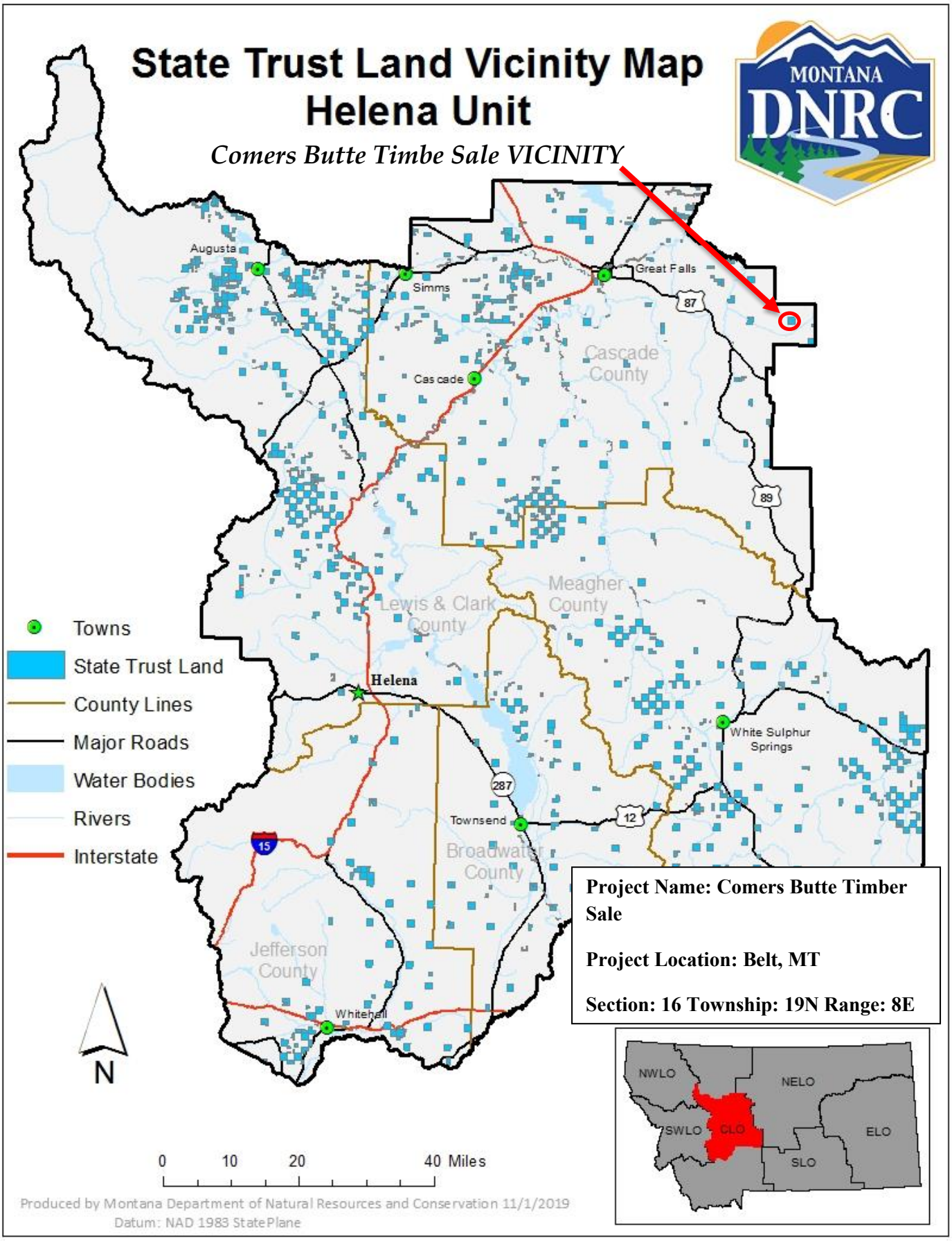
Need for Further Environmental Analysis

☐	EIS	☐	More Detailed EA	☒	No Further Analysis

Environmental Assessment Checklist Approved By:

Name: Adam Blythe
Title: Unit Manager
Date: 5/15/2026
Signature:

Attachment A - Maps


State Trust Land Vicinity Map
Helena Unit
Comers Butte Timbe Sale VICINITY
MONTANA
DNRC
Augusta
Simms
Great Falls
Cascade
Cascade County
87
89
Lewis & Clark County
Meagher County
Helena
White Sulphur Springs
287
12
Townsend
15
Broadwater County
Jefferson County
Whitehall
Towns
State Trust Land
County Lines
Major Roads
Water Bodies
Rivers
Interstate
N
0 10 20 40 Miles
Produced by Montana Department of Natural Resources and Conservation 11/1/2019
Datum: NAD 1983 StatePlane
Project Name: Comers Butte Timber Sale
Project Location: Belt, MT
Section: 16 Township: 19N Range: 8E
NWLO
NELO
SWLO
CLO
ELO
SLO

A-2: Timber Sale Harvest Units

Attachment A - Sale Map
Comers Butte Timber Sale
Section 16 T19N 8E, Cascade County