Environmental Assessment Checklist

Project Name: HB 883 Precommercial Thinning Projects – Phase 2 Proposed Implementation Date: July 2025 Proponent: Trust Lands Forest Management Program, Montana DNRC Counties: Flathead, Lake, Lincoln Trust Beneficiary: Common Schools (57%), Public Buildings (14%), Montana State University (10%), Montana Tech (9%), State Normal School; MSU – Eastern/Western (3%), School for Deaf & Blind (4%) and MSU Morrill (3%)

Type and Purpose of Action

Description of Proposed Action:

The Trust Lands Forest Management Program of the Montana Department of Natural Resources and Conservation (DNRC) is proposing the Phase 2 HB 883 Precommercial Thinning Project. The project is located across 3 counties within the Stillwater, Kalispell, Swan and Libby DNRC administrative Units (refer to Attachments vicinity map A-1 and project map A-2) and includes numerous parcels in the following counties:

Counties	Legal Description	Project Area Acres	Treated Acres
Flathead	72 parcels	38,442	3,650
Lake	11 parcels	4,451	350
Lincoln	3 parcels	1,875	998

Objectives of the project include:

 Utilize HB 883 funds to treat forested State Trust Lands that are present within or in proximity to Wildland Urban Interface (WUI) areas or Forest Action Plan (FAP) priority areas. DNRC would utilize precommercial thinning (PCT) to manage stand density, increase stand vigor, and in some instances, promote desired species compositions to achieve goals and objectives outlined in the State Forest Management Plan. Proposed activities include:

Action	Quantity
Proposed Harvest Activities	# Acres
Clearcut	0.0
Seed Tree	0.0
Shelterwood	0.0
Selection	0.0
Old Growth Maintenance/Restoration	0.0
Commercial Thinning	0.0
Salvage	0.0
Total Treatment Acres	0.0
Proposed Forest Improvement Treatment	# Acres
Pre-commercial Thinning	4,998
Site preparation/scarification	0
Planting	0
Proposed Road Activities	# Miles
New permanent road construction	0.0
New temporary road construction	0.0
Road maintenance	0.0
Road reconstruction	0.0
Road abandoned	0.0
Road reclaimed	0.0
Other Activities	

Duration of Activities:	24 months
Implementation Period:	July 1, 2025 – June 30, 2027

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)
- Montana Fish, Wildlife and Park Lazy Creek Conservation Easements, Phase 1 and 2 (2018)
- Bonneville Power Administration Swift Creek Conservation Easement (2018)
- > and all other applicable state and federal laws.

Project Development

SCOPING:

- DATE:
 - $\circ \quad \text{December 13, } 2024-January 27, 2025$
- PUBLIC SCOPED:
 - The scoping notice was posted on the DNRC Website: https://dnrc.mt.gov/News/scoping-notices
 - The scoping notice was emailed to the Statewide, Kalispell, Stillwater, Libby, and Swan timber scoping lists via GovDelivery
- AGENCIES SCOPED:
 - Montana Department of Fish, Wildlife & Parks
 - Montana Tribal Agencies
 - Bureau of Land Management
 - United States Forest Service
- COMMENTS RECEIVED:
 - How many: Two comments were received in the form of emails.
 - Concerns: One comment was received from Lincoln Electric Cooperative, Inc. (LEC) requesting consultation if the proposed project activities will occur near power line right-of-ways (ROW). One comment was received from Swan Valley Coalition, a nonprofit organization, with concerns about wildlife, fisheries, vegetation, recreation, slash, weeds, roads and public participation.
 - Results (how were concerns addressed): DNRC acknowledged receipt of written comments. All scoping comments were considered by the ID team during the project development process. DNRC developed analysis issues from substantive public comments, which are analyzed in the following document. Non-substantive public comments or public comments outside the scope of this project were dismissed from analysis with rationale.

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

INTERDISCIPLINARY TEAM (ID TEAM):

- Forest Management Planner: Emilia Grzesik (Project Leader)
- Wildlife Biologist: Chris Forristal
- Hydrologist/Soil Scientist: Jeff Schmalenberg
- Fisheries Biologist: Mike Anderson
- Silviculturist: Tim Spoelma

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 <u>https://dnrc.mt.gov/TrustLand/about/planning-and-reports</u>.

- 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.

ALTERNATIVES CONSIDERED:

No-Action Alternative: Under this alternative, no precommercial thinning treatments would occur on the proposed parcels. Wildfire risk in areas within or in proximity to WUI and FAP priority areas would not change. Forest stand density, vigor and species composition would not change.

<u>Action Alternative</u>: Precommercial thinning treatments (PCT) would occur on approximately 4,998 acres of forested Trust Lands to decrease risk of wildfire, decrease stand density, increase stand vigor and in some instances promote desired species composition. PCT treatments would be largely accomplished using hand thinning methods, with minor mechanical thinning (<6% of the project area).

Impacts on the Physical Environment

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

VEGETATION:

Vegetation Existing Conditions:

Project scoping identified eight issues, listed below, related to potential effects on vegetation from this project.

- 1. The proposed project may affect forest cover types and species composition.
- 2. The proposed project may affect stand age classes through tree removal.

- 3. The proposed project may affect forest stand vigor through tree removal.
- 4. The proposed project may affect stand structure through tree removal.
- 5. The proposed project may reduce the risk of wildfire in treated areas.
- 6. The proposed project may result in slash piles that may be burned.
- 7. The proposed project may affect sensitive plants, including whitebark pine.
- 8. The proposed project may increase the amount and spread of invasive weeds.

The proposed project area encompasses 44,766 acres, of which 43,626 acres are forested. The proposed treatment units include 4,998 acres, of which 4,974 acres are forested. Direct and indirect effects were analyzed at the scale of the proposed treatment units and cumulative effects were analyzed at the scale of the project area.

Forest Cover Types and Species Composition:

Current forest types in terms of species composition within the project area and proposed treatment units are described in Table V-1. The current forest types can be directly compared to the desired cover type for a given stand determined by DNRC's site-specific model (ARM 36.11.405). As shown in Table V-1, the mixed conifer, lodgepole pine, Douglas-fir, and subalpine cover types are currently over-represented in both the project area and proposed units, while the western larch/Douglas-fir and western white pine cover types are currently under-represented cover types.

		Project Area		Proposed Treatment Units						
Forest Type	Current	Desired	Difference	Current	Desired	Difference				
Douglas-fir	3,275	655	2,619	273	0	273				
Hardwoods	387	433	(46)	24	23	1				
Lodgepole pine	5,658	2,339	3,318	461	174	287				
Mixed conifer	14,454	4,855	9,599	1,296	424	872				
Non-stocked	1,132	-	1,132	648		648				
Ponderosa pine	1,033	1,160	(126)	166	184	(18)				
Subalpine	4,342	2,067	2,275	429	206	223				
Western larch/ Douglas-fir	11,351	24,554	(13,204)	1,312	2,906	(1,594)				
Western white pine	1,994	7,562	(5,568)	366	1,057	(691)				
Total	43,626	43,626		4,974	4,974					

Table V-1: Current cover types and desired future conditions in the project area and proposed treatment units.

Age Classes:

DNRC assigns age class based on the dominant canopy layer in terms of percentage of canopy cover. Age classes within the project area and proposed treatment units are shown in Table V-2. The proposed treatments focus on younger age classes, with 83% of the proposed treatment acres in the seedling/sapling (0-39) and pole timber (40-99) age classes. Treatment is proposed in 31 acres of old growth where reduction of small-diameter ladder fuels is a treatment

objective or where small portions of old growth stands are adjacent to larger stands in younger age classes that are proposed for treatment.

	Projec	ct Area	Proposed Treatment Unit					
Age Class	Acres	Percent	Acres	Percent				
0-39	13,004	30%	3,048	61%				
40-99	14,533	33%	1,105	22%				
140-149	7,434	17%	440	9%				
150-199	4,572	10%	317	6%				
200+	1,276	3%	33	1%				
Old growth	2,807	6%	31	1%				
Total	43,626	100%	4,974	100%				

Table V-2: Age class within the project area and proposed treatment units.

Stand Vigor:

Stand vigor is a qualitative assessment of stand health relative to growth potential, and is influenced by factors including stand density, age, insects and disease, and environmental factors such as drought. DNRC categorizes stand vigor in four categories:

- 1- Full vigor: individual trees have adequate growing space with full crowns, and tree growth is not impeded.
- 2- Good to average: individual trees are competing for resources but still have good crown form and growth.
- 3- Below average to poor: characterized by reduced growth, trees with poor crown form and ratio, and competition-induced mortality (stem exclusion) within the stand.
- 4- Poor: stand-level growth has stagnated, with individual trees affected by suppression or severely impacted by insects, disease, or environmental factors.

Table V-3 shows stand vigor classification within the project area and proposed treatment units. Within both the project area and proposed treatment units, most stands are classified in the full or good to average vigor classes.

	Projec	t Area	Proposed Treatment Units				
Vigor Class	Acres	Percent	Acres	Percent			
1-Full	7,583	17%	1,145	23%			
2-Good to average	30,130	69%	2,789	56%			
3-Below average to poor	4,118	9%	328	7%			
4 Door							
4-F001	359	1%	59	1%			
Unclassified	1,436	3%	652	13%			
Total	43,626	100%	4,974	100%			

Table V3: Stand vigor classification in the project area and proposed treatment units.

Stand Structure:

Stand structure refers to the number of distinct canopy layers present in a stand. Stand structure is described by three classes: single-storied, two-storied, and multi-storied. Single-storied stands are composed of one canopy layer and are typical of even-aged stands. Two-storied stands have two distinct canopy layers that are indicative of two separate age classes

within the stand, usually where regeneration has established under a dominant overstory canopy layer. Multi-storied stands have at least three distinct canopy layers and are indicative of uneven-aged stands and complex vertical canopy structure. Table V-4 shows stand structure categories within the project area and proposed treatment units.

	Projec	t Area	Proposed Tre	eatment Units
Structure Class	Acres	Percent	Acres	Percent
1-Single-storied	11,699	27%	1,684	34%
2-Two-storied	9,165	21%	1,304	26%
3-Multi-storied	21,441	49%	1,337	27%
4-Unclassified	1,321	3%	648	13%
Total	43,626	100%	4,974	100%

Table V-4: Stand structure classification in the project area and proposed treatment units.

Fire Hazard/Fuels:

Approximately 80% of both the project area and proposed treatment units are in fire groups characterized by infrequent, mixed severity natural fire regimes (fire groups 9 and 11 as defined by Fischer and Bradley 1987). Variable frequency mixed fire regimes (fire groups 6, 8, and 10) occur on approximately 10% of the project area and proposed treatment units, and infrequent, stand-replacing fire regimes (fire group 7) occur on 9% of the project area and proposed treatment units is elevated due to high tree density that ranges from 300 to over 5,000 trees per acre and presence of continuous canopy fuels associated with high tree density. Ladder fuels are present in stands where multiple canopy layers are present, leading to increased risk of crown fire. Ground fuels are variable but generally at low levels and not continuous from effects of past timber harvesting or wildfire. 1,873 acres of the proposed treatment units are within the Wildland/Urban Interface (WUI) as defined by county-specific Community Wildfire Protection Plans (CWPP), and an additional 2,179 acres are within one mile of WUI areas.

Sensitive/Rare Plants:

DNRC's SLI and the Montana Natural Heritage Program (MTNHP) were used to identify the potential presence of plant Species of Concern, including threatened, endangered, or sensitive plant species, in the project area. Species of Concern are native species that are considered at risk of extirpation in Montana due to declining populations, threats to their habitats, restricted distribution, or other factors. Designation as a Montana Species of Concern is not a statutory or regulatory classification (MTNHP 2025). Results of this search were compared to the location of proposed treatment units for potential direct and indirect impacts and to assess the need for protective mitigation measures.

MTNHP data queried in May 2025 identified 19 Species of Concern and 4 Potential Species of Concern with potential presence in the project area (see Vegetation Analysis Attachment Table 2 for a full list of species). Of those, 7 species are potentially present within the proposed treatment units, and one species, whitebark pine, has verified presence within seven proposed treatment units in the West Fork Swift Creek area of the Stillwater Unit.

Noxious Weeds:

Noxious weeds, including spotted knapweed (*Centaurea mauclosa*), yellow hawkweed (*Hieracium caespitosum*), orange hawkweed (*Hieracium aurantiacum*), Canada thistle (*Cirsium arvense*), Bull thistle (*Cirsium vulgare*), oxeye daisy (*Chrysanthemum leucanthemum*), and common St. John's-wort (*Hypericum perforatum*), among others, are present within the project area. These weeds are most often present along roads and landings from previous timber sales within the project area, but also occur less frequently and with limited distribution within the proposed treatment units.

Vegetation Environmental Effects:

		Impact												Comment
Vegetation	Direct					Secondary				Cum	ulative)	Impact Be	Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	willigated?	
No-Action														
Current Cover/DFCs	Х				Х				Х					
Age Class	Х				Х				Х					
Old Growth	Х				Х				Х					
Tree/Stand Vigor	Х				Х				Х					
Stand Structure	Х				Х				Х					
Fire/Fuels	Х				Х				Х					
Sensitive/Rare Plants	Х				Х				Х					
Noxious Weeds	Х				Х				Х					
Action														
Current Cover/DFCs				Х				Х		Х				1,8
Age Class	Х				Х				Х					2,8
Old Growth	Х				Х				Х					2,8
Tree/Stand Vigor			X				X			Х				3,8
Stand structure	Х				Х				Х					4,8
Fire/Fuels			X			Х				Х				5,8
Sensitive/Rare Plants	Х				Х				Х				Yes	6,8
Noxious Weeds		Х				X				Х			Yes	7,8

Potential effects on vegetation are summarized in the table below.

Comments:

- Treatment would alter species composition, favoring shade-intolerant, early seral species such as western white pine, western larch, ponderosa pine, Douglas-fir, and lodgepole pine in most treatment units. As a result, forest cover types are expected to trend toward desired cover types on 59% of the treated acres, while desired cover types would be maintained and remain unchanged on 41% of the treated acres. See Vegetation Analysis Attachment Table 1 for a detailed summary of expected changes to forest cover types within proposed treatment units.
- 2. The determination of age class is based on the dominant overstory layer in the stand. Tree removal associated with this project will reduce tree density but maintain the existing canopy structure; as a result, no changes in age class, including old growth, are expected from this project.

- 3. Reduction of stand density within the proposed treatment units is expected to increase both individual tree growth and overall stand vigor (Moreau *et al.* 2022, del Río Gaztelurrutia *et al.* 2017). Stands currently classified as good to average vigor are expected to increase to full vigor and stands currently classified as below average vigor are expected to increase to good to average vigor. Overall, 79% of treated acres would be expected to attain full vigor, and 7% would have good to average vigor following treatment. Stands currently classified as poor vigor may see a modest increase in vigor but are expected to remain below average due to effects of suppressed or stagnant growth.
- 4. The proposed treatments are not expected to alter stand structure in terms of the presence of canopy layers that currently exist within treated stands. Treatments in single-storied stands will maintain a single-storied canopy structure, with reduced tree density and increased spacing between trees. Treatments within two-storied stands would maintain a two-storied canopy structure with reduced tree density and increased tree spacing in the lower canopy layer. Treatments in multi-storied stands would maintain presence of all canopy levels, with reduced tree density and increased tree spacing in the lower and mid-canopy levels.
- 5. The proposed treatments would alter the amount and distribution of canopy and surface fuels in the project area, including on 4,052 acres (81% of the proposed acres) that are within the WUI or within one mile of the WUI.

Tree density would be reduced to 170 (16 x 16 foot spacing) to 222 (14 x 14 foot spacing) in most treatment units, resulting in decreased canopy fuel continuity and decreased potential for spread of fire from tree to tree (Piqué *et al.* 2022, Peterson *et al.* 2005). Reduction in tree density would also decrease the amount of ladder fuels, especially in multi-storied stands, resulting in reduced likelihood of transmission of surface fire to tree crowns (Johnson *et al.* 2007).

Slash treatment and disposal is essential to fully realize the positive impacts of thinning and reduced tree density on fire hazard and potential behavior (Piqué et al. 2022, Morici and Bailey 2021, Fulé et al. 2001, Graham et al. 1999, Agee 1993, Alexander 1988, Alexander and Yancik 1977). Trees in treated stands that have low amounts of surface fuels have higher tree survival in the event of subsequent wildfire than untreated stands (Prichard et al. 2010, Stephens et al. 2009, Ritchie et al. 2007) or treated stands where slash was not treated (Leverkus et al. 2021, Raymond et al. 2005, Weatherspoon and Skinner 1995). In the proposed treatment units, slash will be lopped and scattered, hand piled and burned, or masticated to comply with the requirements of Montana's administrative rules for slash hazard reduction (ARM 36.11.221-232). High standard reduction requirements would be implemented where treatment unit boundaries coincide with changes in land ownership or near residences, campgrounds, or other infrastructure such as communications structures or powerlines (ARM 36.11.223-226). In all cases, expected surface flame lengths would be less than four feet in accordance with the general standard for slash reduction (ARM 36.11.223). Hand piling and burning or mastication would provide a higher level of surface fuel reduction than lop and scatter treatments. In areas where slash is lopped and scattered, material is typically compressed following one winter and fine branches and needles begin to decompose and incorporate into the forest floor (Schnepf, no date). After 6 years, lopped and

scattered slash is expected to return to pre-treatment levels (Morici and Bailey 2021, Vaillant *et al.* 2015).

6. Whitebark pine, a federally listed threatened species under the Endangered Species Act that occurs in upper subalpine and timberline forest habitats, is present within seven proposed treatment units in the West Fork Swift Creek area of the Stillwater Unit. Forest management activities can be beneficial for whitebark pine and aid in its recovery (US Department of the Interior); however, no whitebark pine will be commercially harvested under this project and individual whitebark pine trees encountered in the project area will be protected to the greatest possible extent during activities associated with this project. Any previously unknown whitebark pine stands will be reported according to ARM 36.11.428(3).

No other plant Species of Concern have been observed in any of the proposed treatment units, and of those potentially present in the project area or proposed treatment units, most occur in wetland habitats where forest management activities are not proposed or are unlikely to occur.

- 7. Opportunities for continued spread or establishment of noxious weeds from this project would be limited because of minimal ground disturbance caused by hand thinning operations and the lack of road building associated with this project. Treatment units where mechanical equipment is used to accomplish mastication provide the best opportunity for ground disturbance or introduction of weeds from other sites. Integrated weed management measures, including required washing and inspection of mechanized equipment prior to operation would be required to minimize potential spread of noxious weeds. Other ongoing weed management activities conducted by DNRC, such as spot or roadside herbicide application to control existing populations, would continue.
- 8. Precommercial thinning has been completed on 1,147 acres within the project area since 2015. Other precommercial thinning projects within the project area that are not associated with this project are currently in progress or planned within the next five years on 2,113 acres. In total, precommercial thinning will have occurred on 8,049 acres (18%) of the project area. The effects of previously completed, planned, or in-progress precommercial thinning treatments are like those expected for this project regarding impacts on species composition and progress toward desired conditions, age class, stand vigor, stand structure, fire and fuel hazard reduction, sensitive plants, and noxious weeds.

Vegetation Mitigations:

- Protect individual whitebark pine trees encountered in proposed treatment units ("ghost" during thinning operations).
- Document presence and establish and implement measures to protect any plant Species of Concern encountered in proposed treatment units.
- Required washing and inspection of mechanized equipment prior to operations to reduce potential spread of noxious weeds.

SOIL DISTURBANCE AND PRODUCTIVITY:

<u>Soil Disturbance and Productivity Existing Conditions:</u> Soils supporting forest growth in areas proposed for treatment were predominately derived from argillite and quartzite parent material of the Belt Supergroup. Soil texture is commonly a gravelly silt-loam grading from sandy loams to clay loams, dependent on elevation and aspect. Soil compaction, displacement and erosion hazard is generally low to moderate if standard forest management best management practices are implemented effectively.

Soil productivity in stands proposed for treatment have moderate to high productivity due to favorable precipitation regimes, productive soils and, in many locations, a volcanic ash cap that hold moisture well throughout the growing season. Site nutrient balances were likely affected in previous commercial forest harvests, but have since been restored through soil biotics, decomposition and mycorrhizal activity as observed by fully stocked and vigorous growing conditions within areas proposed for treatment. All proposed treatments are within past harvest units or areas of wildfire disturbance. Historical detrimental soil disturbance from previous entries is estimated at or slightly above 20% of the area as many forest entries occurred prior to forest management BMP's or direction from the State Forest Land Management Plan.

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

The proposed actions present no risk to slope instability.

Comments:

S-1. Approximately 6% of the total acres (504 acres) proposed for thinning would employ mechanical thinning and/or mastication using small, motorized equipment. On these acres, the

potential for compaction and displacement exists, though the equipment used typically has much lower ground pressure then traditional commercial harvest equipment. As a result, there is a low risk of direct effects to soil physical properties. All other acres proposed for treatment would use hand-thinning methods, resulting in no potential for soil disturbance.

S-2. Erosion potential from in-woods operations where motorized, tracked equipment would be used (6% of treatment area) has a low probability of surface erosion due to type of equipment that would be used, implementation of BMP's and contract specific mitigation measures, which are listed below.

S-3. Most slash treatments would use lopped and scattered and, to a lesser degree, mastication methods. These methods would retain all foliar nutrients on site. In some instances where slash hazard laws would not be met with these treatment methods or adjacent to private property boundaries, hand piling and burning would occur. All of these slash disposal methods would have unmeasurable effects to available soil nutrients.

S-4. Soil productivity was likely reduced in areas proposed for treatment as a result from the initial commercial entry or stand replacement fire event. These effects have since been ameliorated through time as a result of freeze-thaw processes, soil biologic activity and natural regeneration. The proposed activies will have no measurable negative effect on soil productivity.

Soil Mitigations:

- 1. Limit equipment operations to periods when soils are relatively dry, (less than 20 percent oven-dried weight), frozen, or snow-covered to minimize soil compaction and rutting and maintain drainage features. Check soil moisture conditions prior to equipment start-up.
- 2. The contractor and forest officer would agree to a general equipment operations plan prior to operations. Locations of equipment operations and/or restrictions would be identified. Existing skid 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 provide control erosion as needed.
- 3. Implementation of all Administrative Rules for Forest Management

WATER QUALITY AND QUANTITY:

Water Quality and Quantity Existing Conditions: The proposed actions encompass 28 separate 6th code watersheds throughout northwest and west-central Montana. Waters in project area watershed 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. Road inventory has been completed on 94% of the roads in project area watersheds (Table H-1) with 89% of the

roads meeting Best Management Practices for Forestry. Road inventory information suggests a high probability of low level existing cumulative effects to water quality from sediment delivery to surface waters from forest road networks in project area watersheds.

Flow regimes within these watersheds are likely within the natural range of variability considering the dominant natural disturbance regimes in western Montana and levels of historic forest cover (Losensky,1997). Watershed canopy cover has likely vacuolated over the past 200 years as forests experience stand replacement fire events and subsequent regeneration. Stand density in areas of proposed treatment is currently well to overstocked with transpiration likely accounting for a higher proportion of the water balance than historical condition.

	DNRC	Total DNRC	Percent	Road Monting	Road Not
Watershed Name (6th Code HUC)	Ownership	Project Area Road	Inventoried		Meeting BMP's
	(Acres)	(miles)	(%)	DIVIP 5 (%)	(%)
Cyclone Creek	5,143	11.2	88	80%	20%
Dog Creek	8,552	36.3	90	80%	20%
Flathead River-Rose Creek	2,770	9.2	100	100%	0%
Flower Creek	1,268	4.8	100	100%	0%
Hay Creek	2,233	10.5	100	87%	13%
Lower Coal Creek	5,203	9.8	88	80%	20%
Lower Good Creek	1,731	11.9	85	86%	7%
Lower Kootneai River	525	1.5	100	100%	0%
Lower Lake Creek	1,114	6.2	100	89%	0%
Lower Stillwater River-Tobie Creek	6,962	0.2	100	100%	0%
Lower Whale Creek	775	4.4	100	100%	0%
Middle Fortine Creek	2,394	7.3	100	87%	3%
Middle Middle Swan River	25,101	23.7	99	94%	6%
North Fork Flathead River-Ford Creek	1,832	1.2	100	100%	0%
North Fork Flathead River-Winona Ridge	1,217	4.2	100	100%	0%
OBrien Creek	290	3.1	100	81%	0%
Pleasant Valley Fisher River-Loon Lake	1,272	13.1	83	66%	24%
South Fork Upper Coal Creek	1,036	2.9	30	100%	0%
Stillwater River Headwaters	14,545	5.6	100	100%	0%
Swift Creek-Antice Creek	7,392	6.4	100	100%	0%
Swift Creek-Hemlock Creek	14,378	32.1	100	83%	17%
Tobacco River	2,338	10.1	100	43%	46%
Upper Bitteroot River-Sickler Creek	4,356	3.5	95	95%	0%
Upper Stillwater River-Hellroaring Creek	14,254	32.5	96	91%	6%
Upper Stillwater River-Lower Stillwater Lake	12,872	59.2	99	94%	5%
West Fork Swift Creek	15,845	4.4	93	100%	0%
Whitefish Lake	1,016	3.5	100	99%	1%
Woodward Creek	12,608	1.1	99	55%	45%
Summary /Averages	169,022	320.2	94	89%	8%

 Table H-1: Project area road inventory summary.

Water Quality &	Impact											Can	Comment	
Quantity	Direct					Secondary			Cumulative				Impact Be	Number
-	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Miligateur	
No-Action														
Water Quality	Х				Х					X			N/A	H-1
Water Quantity	Х				Х				Х				N/A	
Action														
Water Quality	Х				Х					X			N/A	H-1
Water Quantity	Х					Х			Х				N/A	H-2

Comments:

H-1. No road construction, reconstruction or maintenance is proposed under the action alternative. Road use typically associated with administrative access use would be expected to implement proposed treatments. This would consist of light weight passenger trucks and vans over a period of 2-3 weeks for each project area. No additional sediment delivery from forest roads would be expected over the low-level effects described in the existing conditions. Application of corrective actions to address sediment delivery from road surfaces and stream crossings is ongoing and driven by commitments and timelines from DNRC Forest Management HCP (DNRC 2012).

H-2. Measurable increases to soil water availability would be expected as a result of decreasing tree density in proposed treatment units and subsequent reductions in transpiration. Canopy interception would be reduced resulting in reduced snow sublimation. No effects to streamflow or hydrograph timing would be expected due to the dispersed nature of treatment units over 42 watershed and total acres treated in any given watershed.

Water Quality & Quantity Mitigations:

- 1. Implement all applicable Best Management Practices for Forest Management.
- 2. Implement all applicable Administrative Rules for Forest Management.
- 3. Implement all applicable Streamside Management Zones laws.
- 4. Apply all applicable conservation commitments within Montana's Forest Management Habitat Conservation Plan.

FISHERIES:

Introduction: The proposed activities under consideration in this analysis include precommercial thinning on 4,997 acres of DNRC-Trust Lands. During project scoping, two comments were received related to the potential environmental effects of the proposed project.

- 1. The proposed project may affect fisheries or fisheries habitat.
- 2. The proposed project may affect riparian areas, which may directly or indirectly impact fisheries habitat.

Fisheries Existing Conditions: Project area watersheds and federally-listed endangered or threatened, and state species of concern are found in Table FS-1. The proposed project area includes 33 fish bearing watersheds (6th HUC) in three counties in western Montana. The fisheries analysis will focus on Bull (*Salvelinus confluentus*), Westslope cutthroat (*Oncorhynchus clarkii lewisii*) and Columbia Basin redband (*O. mykiss gairdnerii*) trout and habitat. While other fish species are present in the project area (MFISH 2025), anticipated

impacts of the proposed project would impact other species similarly, and all proposed mitigations would apply to this project in the same manner regardless of the species present. Considerable overlap between native and introduced species occurs in the project area.

<u>No-Action</u>: 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.

						Im	pact						Can	Comment
Fisheries	Direct					Secondary				Cum	ulative		Impact Be	Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Willigated?	
No-Action														
Sediment		X				Х				Х			Y	FS-1
Flow Regimes	Х				Х				Х					FS-2
Woody Debris	Х				Х				Х					FS-2
Stream Shading	Х				Х				Х					FS-2
Stream Temperature	Х				Х				Х					FS-2
Connectivity				X				Х				Х	Y	FS-3
Populations				X				Х				Х	N	FS-4
Action														
Sediment	Х				Х					Х			Y	FS-5
Flow Regimes	Х				Х				Х					FS-6
Woody Debris	Х				Х				Х					FS-6
Stream Shading	Х				Х				Х					FS-6
Stream Temperature	Х				Х				Х					FS-6
Connectivity	X				Х							Х	Y	FS-3
Populations	Χ				Χ							Χ	Ν	FS-4

Action Alternative (see Fisheries table below):

Fisheries Comments and Mitigations:

FS-1: Road inventory has been completed on the majority of project area streams during the last 10 years as a part of the HCP. Known sediment sources are present in 16 of the project area watersheds (DNRC 2025). Application of corrective actions to address sediment delivery from road surfaces and stream crossings is ongoing and driven by commitments and timelines from the HCP (DNRC 2012).

FS-2: While previous timber management has occurred in all project area watersheds, the current conditions of flow regime, stream shade, stream temperature, and large woody debris loading rates are likely within the range of historic conditions observed in natural watersheds subject to natural levels of disturbance (DNRC 1996).

FS-3: Fisheries connectivity is impaired by existing stream crossings in 8 project area watersheds (DNRC 2025). No existing crossings limit connectivity in Bull trout streams. All crossing barriers are on Westslope cutthroat or Columbia River redband trout streams.

Implementation of the HCP conservation strategy focused on improving connectivity would continue to occur under either the No-Action or Action Alternative. Existing high-level impacts to connectivity would continue to occur until stream crossings are replaced or removed under timelines established under the HCP (DNRC 2012).

FS-4: Significant overlap between native and introduced fish species occurs throughout the project area. No introduction, suppression, or removal of native or introduced fish would occur as a result of the implementation of this project. Existing high impacts of introduced species on native fish species including competition, displacement, predation, and hybridization would continue to occur with selection of either the No-Action Alternative or the Action Alternative.

FS-5: Selection of the Action Alternative would not elevate Sediment Delivery from existing levels. Access to proposed PCT units would be on existing open- and restricted-access forest roads, largely in light duty vehicle transporting hand crews. No equipment operation would occur in the RMZ. Low level cumulative impacts would continue to occur at sediment delivery locations until corrective actions are applied under the HCP.

FS-6: Some thinning would occur in the RMZ along Class 1 streams in 19 of the project area watersheds (Table FS-2). Target stand characteristics following thinning would promote focal species growth, with fully mature target stand condition being a nearly closed canopy, providing shade, recruitment of large woody debris, and moderating stream temperatures. Short-term impacts to flow regime, stream shade, stream temperature, and large woody debris are unlikely to occur under selection of the No-Action or Action Alternative. Long-term benefits may occur as a result of increased individual tree growth due to reduction in competition and increased individual tree vigor (See Vegetation Analysis for detail).

Table FS-1: Occupied river miles for Bull trout, including listed critical habitat, Westslope cutthroat, and Columbia River redband trout in project area watersheds.

		Bull trout		Westslope	Columbia River
		Critical	Habitat	cutthroat trout	redband trout
Watershed Name (6th Code HUC)	Miles occupied in watershed	Spawn-Rear	Foraging- Overwinter- Migration	Miles occupied in watershed	Miles occupied in watershed
Cyclone Creek	9.6	9.1		9.7	
Dog Creek				0.5	
Evers Creek					
Flathead River-Rose Creek	8.5		8.5	8.6	
Flower Creek	9.0			15.6	3.5
Hay Creek	22.2			25.4	
Lazy Creek					
Lower Coal Creek	10.9	10.9		20.2	
Lower Good Creek				18.5	
Lower Kootenai River	16.5	0.1	16.4	22.3	20.0
Lower Lake Creek	10.8	0.1	1.1	31.3	5.8
Lower Stillwater River-Tobie Creek	17.3				
Lower Whale Creek	14.3	14.2		24.3	
Middle Fortine Creek	0.9			29.8	
Middle Kootenai River	12.1	0.1	11.8	2.0	8.0
Middle Middle Swan River	14.1	0.1	14.0	16.0	
North Fork Flathead River-Ford Creek	36.7	0.1	23.0	47.9	
North Fork Flathead River-Winona Ridge	8.6	0.1	8.4	11.9	
OBrien Creek	12.5	17.2		32.4	
Pleasant Valley Fisher River-Loon Lake				15.0	0.6
South Fork Upper Coal Creek	9.3	9.2		10.5	
Stillwater River Headwaters	13.7	13.7		20.5	
Swift Creek-Antice Creek	3.1		3.1	8.2	
Swift Creek-Hemlock Creek	13.3		13.3	34.4	
Tobacco River	14.4		13.4	24.7	
Upper Ashley Creek					
Upper Bitteroot River-Sickler Creek				1.3	
Upper Stillwater River-Hellroaring Creek	14.0	14.0		10.1	
Upper Stillwater River-Lower Stillwater	9.1			1.0	
West Fork Swift Creek	7.8	7.8		16.8	
Whitefish Lake	0.1			9.4	
Whitefish River-Motichka Creek	17.7			17.7	
Woodward Creek	10.2	6.6		9.1	

Table FS-2: Riparian management zone timber stand characteristics in project area watersheds.

		Total Acres		RMZ Acres					
Watawaad Nama (6th Cada HIIC)	TAT to solve 1	DNRC	Proposed Thinning	Non-stock or Seedling-	Pole- or Saw-	Total RMZ	Proposed RMZ Treatment		
	watershed	0wnersnip	Acres	Sapling	11mber	Acres	Acres		
Cyclone Creek	8,373	4,378	46	59.5	145.3	204.7			
Dog Creek	8,561	8,293	231	49.2	422.3	4/1.5	4.1		
Evers Creek	7,769	1,360	15	7.1	89.9	97.0	0.6		
Flatnead River-Rose Creek	32,960	1,832	23	2.6	36.6	39.2			
Flower Creek	11,918	1,259	355	8.8	98.6	107.4	14.0		
Hay Creek	27,341	2,259	124	14.9	125.5	140.4	6.8		
Lazy Creek	10,432	7,512	727	126.1	317.4	443.5	6.2		
Lower Coal Creek	17,340	5,092	362	96.1	206.3	302.4	11.8		
Lower Good Creek	25,404	1,731	196	7.9	112.2	120.0	3.1		
Lower Kootneai River	33,920	479	5	0.4	24.6	24.9	0.1		
Lower Lake Creek	25,722	913	342	1.0	21.0	21.9	0.9		
Lower Stillwater River-Tobie Creek	28,662	5,992	0	7.7	247.9	255.6			
Lower Whale Creek	18,800	539	98	13.4	10.3	23.7			
Middle Fortine Creek	23,546	2,394	19	18.1	114.3	132.4			
Middle Kootneai River	32,566	257	10	2.1	0.0	2.1	0.9		
Middle Middle Swan River	26,729	19,185	323	71.3	761.3	832.6	1.2		
North Fork Flathead River-Ford Creek	37,714	980	50	9.2	49.0	58.2			
North Fork Flathead River-Winona Ridge	16,865	1,217	218	24.5	15.3	39.8	5.8		
OBrien Creek	30,894	290	44	0.0	0.0	0.0			
Pleasant Valley Fisher River-Loon Lake	30,342	1,272	115	15.7	9.5	25.3			
South Fork Upper Coal Creek	11,840	831	33	0.4	45.0	45.4	0.2		
Stillwater River Headwaters	21,128	14,363	43	84.4	979.5	1063.9			
Swift Creek-Antice Creek	6,829	6,829	15	51.9	489.2	541.0			
Swift Creek-Hemlock Creek	18,248	13,995	379	70.8	1008.7	1079.5	12.9		
Tobacco River	40,027	1,824	48	10.1	57.0	67.1	3.9		
Upper Ashley Creek	15,573	547	43	0.0	12.9	12.9			
Upper Bitteroot River-Sickler Creek	36,584	2,516	55	3.9	85.8	89.7	0.3		
Upper Stillwater River-Hellroaring Creek	22,672	14,105	316	45.1	850.2	895.2	15.8		
Upper Stillwater River-Lower Stillwater Lake	17,511	12,107	502	71.7	346.1	417.7	8.5		
West Fork Swift Creek	12,819	12,719	82	174.2	648.9	823.1	2.3		
Whitefish Lake	17,109	1,013	13	5.9	60.2	66.1			
Whitefish River-Motichka Creek	16,709	558	137	0.0	0.0	0.0			
Woodward Creek	16,089	11,776	27	29.9	538.3	568.2			

WILDLIFE:

Wildlife Existing Conditions: Direct and Secondary impacts were analyzed within the Wildlife Analysis Area (hereafter WAA). The 171,694-acre WAA is comprised of DNRC-managed parcels containing proposed thinning units plus the Swan, Coal Creek, Stillwater West, East and South Lynx Management Areas. Approximately 98% of these lands are included in DNRC's Habitat Conservation Plan (USFWS and DNRC 2010). Wildlife habitat is diverse within the WAA, ranging from treeless alpine terrain to wet mesic forest to dry ponderosa pine sites interspersed with open meadows. Human presence and influence on wildlife habitat is similarly diverse, with some areas containing major highways and human developments whereas other areas are remote and have little to no human presence. Roads, particularly open (unrestricted) roads can disturb or displace some wildlife species. Road densities within the WAA vary from 0 to greater than 5 miles per square mile. Public, non-motorized recreational use of the WAA is low to moderate and likely increases during the big game hunting season.

Although the WAA contains a wide range of wildlife habitat, precommercial thinning (PCT) treatments are typically focused on forested stands in young age classes dominated by densely stocked seedling to pole sized trees ranging from 4 to 20 feet tall. Increasing density of trees in stands can begin to exclude larger wildlife species due to the difficulty and danger of movement. In contrast, some smaller species (e.g. snowshoe hare) can utilize these forest conditions for shelter, food and protection. PCT treatments aim to increase the growth and vigor of healthy trees by reducing competition while still maintaining stocking levels of 170 to 302 trees per acre. In addition to increased growth, the risk of habitat loss or conversion by stand-replacement wildfire is reduced in treated stands (Piqué *et al.* 2022, Peterson *et al.* 2005).

Cumulative effects analysis areas (CEAA) include lands encompassing the WAA parcels and are large enough to consider annual movements of animals that travel across sizeable areas such as grizzly bears and big game. Primary land uses in the CEAAs are commercial timber harvest, outdoor recreation and ranching. Additional information on cumulative effects analysis areas and analysis methods are available upon request.

No-Action Alternative: None of the proposed activities would occur. In the short-term, no changes to the amounts, quality, or spatial arrangement of forested habitat would occur. In the long-term, habitat suitability for forest-associated species would remain similar to current conditions as long as disturbance (such as wildfire) is excluded. An increase in stand-replacement wildfire risk would be anticipated.

				Can	Commont									
Wildlife		Direct				Sec	ondary		Cumulative				Impact be	Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Mitigated?	
Threatened and Endangered Species														
Grizzly bear (Ursus arctos) Habitat: Recovery areas, security from human activity		x				x				x			Y	WI-1

Action Alternative (see Table W-1 below):

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	Impact										Can	Commont		
Wildlife		Di	irect			Seco	ondary			Cum	ulative		Impact be	Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Mitigated?	Number
Lynx (Felis lynx) Habitat: SF hab.types, dense sapling, old forest, deep snow zone			x				x			x			Y	WI-2
Yellow-billed cuckoo (Coccyzus americanus) Habitat: open cottonwood riparian forest with dense brush understories (Lake and Flathead counties)	x				x				x					WI-3
Wolverine (Gulo gulo) Habitat: high elevation areas that retain high snow levels in late spring		x				x			x				Y	WI-4
Sensitive Species														
Bald eagle (Haliaeetus leucocephalus) Habitat: Late- successional forest within 1 mile of open water		x				x			x				Y	WI-5
Black-backed woodpecker (<i>Picoides arcticus</i>) Habitat: Mature to old burned or beetle-infested forest	x				x				x					WI-3
Common loon (Gavia immer) Habitat: Cold mountain lakes, nest in emergent vegetation		x				x			x				Y	WI-6
Fisher (Martes pennanti) Habitat: Dense mature to old forest less than 6,000 feet in elevation and riparian		x				x				x			Y	WI-7
(Otus flammeolus)		X				X			Χ				Y	WI-8

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	Impact								Can	Commont				
Wildlife		Di	irect			Seco	ondary			Cum	ulative		Impact be	Comment Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Mitigated?	Humber
Habitat: Late-														
successional														
ponderosa pine														
and Douglas-fir														
forest														
Peregrine falcon														
(Falco peregrinus)														
Habitat: Cliff	v				v				v					W/I 2
features near open	^				^				^					VVI-5
foraging areas														
and/or wetlands														
Pileated														
woodpecker														
(Dryocopus														
pileatus)														
Habitat: Late-		Х				Х			Х				Y	WI-9
successional														
ponderosa pine														
and larch-fir forest														
Fringed myotis														
(Myotis														
thysanodes)														
Habitat: low														
elevation														
ponderosa pine,		Х				Х			Х				Y	WI-10
Douglas-fir and														
riparian forest with														
diverse roost sites														
including outcrops,														
caves, mines														
Hoary bat														
(Lasiurus cinereus)														
Habitat: coniferous														
and deciduous														
forests and roost		X				X			Х				Y	WI-10
on foliage in trees.														
under bark. in														
snags, bridges														
Townsend's big-														
eared bat														
(Plecotus														14/1 6
townsendii)	X				X				X					WI-3
Habitat: Caves.														
caverns, old mines														
Big Game Species														
Elk		Х				Х				Х			Y	WI-11
Whitetail		Х				Х				X			Y	WI-11
Mule Deer		Х				Х				Х			Y	WI-11
Other														

Comments:

WI-1 Grizzly bear - The WAA contains 161,356 acres of grizzly bear recovery habitat and 8,230 acres in non-recovery occupied habitat (USFWS 1993, Wittinger 2002). Nearly all of these acres are part of the Northern Continental Divide Ecosystem (NCDE), except for 1,386 acres within non-recovery occupied habitat associated with the Cabinet Yaak Ecosystem (CYE). Grizzly bear hiding cover would be altered by the proposed precommercial thinning on approximately 2,597 acres within grizzly bear recovery habitat and 458 acres within nonrecovery occupied habitat, or 3,056 acres in total (2.4% of hiding cover in the WAA). However, PCT treatments do not fully remove hiding cover as residual tree densities continue to provide adequate cover. No new roads would be constructed. Motorized use of existing open, temporary and restricted roads within the Project Area would increase short-term during project implementation. Existing restricted roads would remain restricted with gates or berms. In the recovery zone, visual screening would be maintained ≤ 100 feet from an open road where it is available. Where visual screening is scarce between an open road and preferred grizzly bear habitat (i.e. wetlands, meadows), all available cover will be retained. Proposed thinning units are spread across a broad geographic area and average 43 acres in size; potential displacement would be expected to be short-term and localized. Any grizzly bears using the immediate area near thinning units could be temporarily displaced by the proposed activities and associated disturbance for up to 1 month per unit. Spring timing restrictions would be applied from April 1 -June 15 (or June 30 in some parts of the Stillwater State Forest) to provide security for grizzly bears recovering from winter denning. Increased temporary disturbance under the Action Alternative would be additive to recent and ongoing forest management projects. Additional mitigations to minimize human-bear conflicts would be implemented (see Wildlife Mitigations). The greatest risks to bears within the CEAA would continue to be human habitations and associated attractants that bring bears into conflict with people.

WI-2. Canada Lynx – Approximately 3,136 acres (2.5%) of existing suitable habitat in the WAA would be impacted by the proposed thinning activities. All of these acres would receive thinning treatments that would reduce some habitat attributes and habitat guality but would continue overall to provide suitable lynx habitat. Anticipated changes in lynx habitat under the Action Alternative are enumerated in Table W-2. Thinning in more densely stocked stands would convert lynx "summer foraging" habitat into "other suitable" lynx habitat by reducing tree abundance. (Table W-2). To ensure that forest structural attributes preferred by snowshoe hares remain following treatment, some shade-tolerant tree species would be retained within thinning units. Additionally, coarse woody debris would be preserved in accordance with DNRC Forest Management Rules (ARM 36.11.414). Within lynx management areas (LMAs), deferral areas representing at least 20% of the acreage proposed for thinning (see Table W-3) would be excluded from any forest management until these stands grow into sawtimber (averaging ≥ 8 " dbh). Lynx habitat connectivity within the WAA would not be measurably affected. The proposed activities could temporarily displace any lynx that might be using the immediate area in or adjacent to thinning units. If present near a PCT unit, lynx could be temporarily displaced by forest management activities for up to 1 month per unit. Disturbance/displacement and habitat alteration by the proposed DNRC activities be additive to past, proposed, and ongoing forest management projects.

Lynx Habitat Category	Existing	Post-PCT
Other Suitable	20,836.1 (13.5%)	21,948.4 (14.2%)
Summer Forage	30,654.8 (19.8%)	29,542.5 (19.1%)
Temporary Nonsuitable	26,534.7 (17.2%)	26,534.7 (17.2%)
Winter Forage	76,648.5 (49.6%)	76,648.5 (49.6%)
Grand Total: Suitable Lynx Habitat	128,139.4 (82.8%)	128,139.4 (82.8%)

Table W-2: Anticipated changes to existing lynx habitat within the Wildlife Analysis Area (WAA) under the precommercial thinning (PCT) action alternative.

Table W-3: Precommercial thinning acres proposed in DNRC Lynx Management Areas (LMA) and corresponding mitigation deferral acres.

LMA	Treatment Acres	Mitigation Deferral Acres	Deferral Percent
Coal Creek	824.1	165.4	20.1%
Stillwater East	310.5	75.9	24.4%
Stillwater South	1,216.5	248.9	20.5%
Stillwater West	526.6	114.5	21.7%
Swan	349.9	71.0	20.3%

WI-3. This species was evaluated, and it was determined that the project area lies outside of the normal distribution for the species, and/or suitable habitat was not found to be present.

WI-4. Wolverine – Potentially suitable wolverine habitat exists within the WAA. Wolverines have been observed in the WAA (Montana Natural Heritage Program data, 15 April 2025, Southwestern Crown Carnivore Monitoring Team 2023) and occasional use of the area by wolverines is possible. Thinning could occur on 125 acres that retain persistent spring snowpack at least four out of seven years (Copeland et al. 2010). No effects to potential denning habitat are anticipated as avalanche chutes and talus are absent from proposed PCT areas. During the non-denning season, minor short-term displacement associated with thinning disturbance could occur if wolverines are in the immediate area. No new roads would be built. Given the large home range area wolverines occupy (average 150 plus square miles), the long distances wolverines typically cover during their movements, lack of denning habitat, and that the proposed activities would not occur between April 1 and June 15 and are unlikely to occur during the winter (most of the wolverine denning season); the proposed activities are not expected to measurably affect use of the area by wolverines. Negligible adverse direct, indirect,

or cumulative effects to wolverines would be expected to occur as a result of either Action Alternative.

WI-5. Bald Eagle – Portions of the WAA fall within active territories of bald eagles (*MTNHP* 2025, *DNRC unpublished data*). Proposed thinning is outside of known nest site and primary use areas (*ARM 36.11.436(7)*). To reduce potential adverse impacts on nesting eagles, thinning is prohibited within 330 feet of nest sites and no motorized thinning activities would be permitted from February 1 – August 15 within $\frac{1}{2}$ mile of unhabituated eagle nests.

WI-6. Common Loon – Suitable lake habitat occurs within the WAA. Loon nesting area(s) are at least 200 feet from any proposed thinning units. Activities associated with the Action Alternative would not affect shoreline habitat, and motorized forest management activities within a 500-foot radius of the nest site are prohibited between April 15 and July 15. Loons using lakes within the WAA are likely habituated to moderate levels of motorized and non-motorized human disturbance. Thus, negligible direct, indirect, or cumulative effects to common loons would be anticipated.

WI-7. Fisher – The proposed thinning activities could affect 718 acres of potentially suitable fisher habitat (1.2% of suitable fisher habitat available in the WAA). However, as PCT treatments are focused on stands dominated by young trees, most of these acres are likely of low quality to fishers. Fisher habitat would not be removed by thinning treatments targeting small trees. Another 2,088 acres of preferred fisher cover types would undergo thinning. By increasing growth and health of remaining trees, as well as favoring seral species, thinning treatments could result in stands growing into suitable fisher habitat more quickly. No new roads would be built, and existing restricted roads would continue to be restricted by gates or berms. At least 2 large snags and 2 large snag recruitment trees per acre (>21 inches dbh) would be retained (ARM 36.11.411). These snags and large trees are important habitat features that provide resting and denning sites for fishers (Olson 2014). Connectivity of suitable fisher habitat would not be appreciably affected by the proposed treatments. However, the likelihood of fishers using much of the WAA is low given the lack of fisher observations in the majority of the area within the last 20 years (MTNHP 2025, Krohner 2022). Should any fishers be present within the WAA, potential disturbance would be additive to any recent and ongoing forest management projects.

WI-8. Flammulated Owl – The proposed activities could alter up to 311 acres of preferred flammulated owl habitat types in the WAA. Many of these acres do not currently exhibit suitable forest structure for use by flammulated owls. Because mature trees are not targeted by PCT prescriptions, flammulated owl habitat would be minimally affected. Increased growth of thinned stands and the favoring of seral species would advance recruitment of future flammulated owl habitat. Snags and snag recruits would not be impacted (*ARM 36.11.411*). Temporary disturbance due to the proposed action could displace flammulated owls in the short term and would be additive to recent and ongoing forest management projects.

WI-9. Pileated Woodpecker – The proposed activities could affect up to 399 acres of potentially suitable pileated woodpecker habitat in the WAA. However, all of these acres would remain suitable habitat, because precommercial thinning does not target mature trees. The removal of saplings and small pole-sized trees would not appreciably affect pileated woodpecker habitat. Increased growth of thinned stands and the favoring of seral species would speed development of future pileated woodpecker habitat. Snags, snag recruits, and large woody debris would not be impacted (*ARM 36.11.411*). Pileated woodpeckers are generally tolerant of human activities, but any temporary disturbance due to the proposed action would be additive to recent and ongoing forest management projects.

WI-10 Fringed myotis and Hoary bat – Potential habitat for these two bat species could be affected by the proposed thinning. Fringed myotis utilize a variety of habitats and roost sites including pine and Douglas-fir forests (*Keinath 2004*). Hoary bats typically roost in tree foliage (*Bachen et al. 2020*). If present in the immediate vicinity of thinning units, they could be temporarily displaced by the activities. Potential disturbance would only be expected from late May through September, when these bats are active in Montana. Snags and large trees that could provide roosting habitat would not be impacted (*ARM 36.11.411*). No known caves or congregations of bats are present in the WAA.

WI-11. Big Game – Portions of the WAA contain winter range for deer, elk and moose (*DFWP 2008*). Hiding cover would be altered by the proposed activities on 3,335 acres (2.6% of hiding cover in the WAA). Sufficient vegetation would be retained on all of these acres to continue providing hiding cover for big game post-harvest. Mature forest stands providing high-quality thermal cover for wintering big game are not typically targeted for PCT prescriptions. Proposed harvest treatments would remove small trees that are not providing appreciable amounts of thermal cover or snow intercept on big game winter range. Increased growth of thinned stands and the favoring of seral species would likely favor big game in the long term by decreasing the amount of time needed for stands to mature and creating more foraging opportunities. No new roads would be built, and existing restricted roads would continue to be restricted by gates or berms. Hiding cover would remain abundant within the WAA and CEAA. Temporary disturbance due to the proposed action would be additive to recent and ongoing forest management projects. Measurable big game population changes at the scale of the CEAA would not be expected under either alternative.

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)*.
- Prohibit all motorized precommercial thinning activities more than 100 feet from open roads from April 1 – June 15 or June 30 depending upon location in grizzly bear recovery zones and NROH, referring to the Stillwater Transportation Plan in the Stillwater and Coal Creek State Forests (USFWS and DNRC 2010).
- Retain visual screening along open roads in the grizzly bear recovery zone. Where visual screening is scarce between an open road and preferred grizzly bear habitat (i.e. wetlands, meadows), retain all available cover. Retaining visual screening to the extent possible in non-recovery occupied habitat is recommended.
- Within precommercial thinning units, retain shade-tolerant trees as per LY-HB4 where available and appropriate (*USFWS and DNRC 2010*).
- Prohibit mechanized forest management activities within ¼ mile of active bald eagle nests from February 1 August 15 to protect nesting bald eagles.
- Maintain public motorized restrictions on restricted roads during and after thinning activities.
- Retain at least 2 snags and 2 snag recruits per acre >21 inches dbh or the next largest available size class, particularly favoring ponderosa pine, western larch and Douglas-fir for retention. 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 15inch diameter downed logs, aiming for at least one 20-foot-long section per acre LY-HB2

(USFWS and DNRC 2010). High-hazard clean up areas are exempt from standard coarsewoody debris retention guidelines.

AIR QUALITY:

						Impact							Can	Comment
Air Quality		Di	irect			Sec	ondary			Cum	ulative)	Impact Be	Number
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	Miligaleu ?	
No-Action														
Smoke	Х				Х				Х					
Dust	Х				Х				Х					
Action														
Smoke		Х			Х				Х				Yes	1
Dust		Х			Х				Х					2

Comments:

- 1. Hand-piled slash would be burned on some treatment units and would likely occur during the months of September through November or March through May depending on fuel and weather conditions. None of the proposed treatment units are within air quality impact zones. Burning activities would be short in duration and conducted when conditions favor good to excellent ventilation and smoke dispersion as determined and approved by *DEQ*, the smoke monitoring unit of the *Montana/Idaho Airshed Group*, and county air quality programs in Flathead, Lincoln, and Missoula Counties. Burning activities would be done in accordance with DNRC's Major Open Burning Permit issued by DEQ, and would meet *EPA* standards, which would minimize the direct, indirect, and cumulative effects of burning activities.
- PCT operations at a single site would be short in duration (2-3 weeks). Dust may be created from driving on portions of native surface roads during summer and fall months. Contract clauses would specify the use of dust abatement or require vehicles to reduce speed if necessary to reduce dust near any affected residences.

Air Quality Mitigations:

- Burning within the project area will be short in duration and will be conducted when conditions favor good to excellent ventilation and smoke dispersion as determined by the Montana Department of Environmental Quality and the Montana/Idaho Airshed Group.
- DNRC will only burn on days approved by the DEQ, Montana/Idaho Airshed Group, and county air quality programs.

ARCHAEOLOGICAL SITES / AESTHETICS / DEMANDS ON ENVIRONMENTAL RESOURCES:

Will Alternative					Can	Comment								
result in potential		D	irect			Secondary				Cum	ulative		Impact Be	Number
impacts to:	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	willigated ?	
No-Action														
Historical or Archaeological Sites	x				х				Х					
Aesthetics	x				x				x					
Demands on Environmental Resources of Land, Water, or Energy	x				x				x					
Action														
Historical or Archaeological Sites	х				x				х					1
Aesthetics		X			x				x					2
Demands on Environmental Resources of Land, Water, or Energy	x				x				x					

Comments:

 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.

Because the topographic setting and geology suggest a low to moderate likelihood of the presence of cultural or palaeontologic resources, proposed 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.

2. Forested stands proposed for PCT treatment are dense and over-stocked with early seral tree species. The proposed activities would thin out the trees within the stand, creating a more open stand structure. Noise from pre-commercial thinning activities, primarily from the use of chainsaws, would be audible in and around the project area but would be short in duration. Noise from project activities could be expected to be present anytime between July 2025 through to the end of June 2027 during the general "work week".

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.

- HB 883 Precommercial Thinning Projects Phase 1 EA
- Upper Stillwater Forest Management Project EA
- Olney North Forest Management Project EA
- Swift Stryke Forest Management Project EA
- Lupfer Loop Timber Sale EA
- Taylor to Swift Forest Management Project Scoping Notice (proposed)
- No Tellum Timber Sale EA
- Foothills Restoration EA
- West Woods Multiple Timber Sale EIS

Impacts on the Human Population

Evaluation of the impacts on the proposed action including <u>direct, secondary, and cumulative</u> impacts on the Human Population.

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

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Will Alternative						lm	pact		Can Impact Bo	Comment				
result in potential		Di	rect		Secondary				Cumulative				Impact Be	Number
impacts to:	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High	willigated?	
Action														
Health and Human Safety	х				x				Х					
Industrial, Commercial and Agricultural Activities and Production	x				x				x					
Quantity and Distribution of Employment	X				x				x					
Local Tax Base and Tax Revenues	х				х				х					
Demand for Government Services	х				x				Х					
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	х				х				Х					
Cultural Uniqueness and Diversity	х				X				х					

Comments: The proposed project would have no impacts on the human population.

Mitigations: N/A

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.*

• The project area was identified based on occurrence within or nearby the wildland urban interface (WUI) and/or within or nearby Montana Forest Action Plan priority areas.

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 or cost.

No Action: The No Action alternative would not utilize any HB 883 funds and would not change future revenue generation to the associated trusts at this time.

Action: The proposed action would utilize funds from House Bill 883 to conduct PCT activities within the project area. Approximately \$1,000,000 of the total HB 883 funds allocated to the Trust Lands Forest Management Program would be utilized to implement proposed treatments through third-party contractors. Management of stand density at this time would likely result in a

decreased risk of stand stagnation and an increase in stand vigor. As a result, trust beneficiaries would likely realize a return on investment sooner than the no action alternative.

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Does the proposed action involve potential risks or adverse effects that are uncertain but extremely harmful if they were to occur? None

Does the proposed action have impacts that are individually minor, but cumulatively significant or potentially significant? None

Environmental Assessment Checklist Prepared By:

Name: Trust Land Management – Forest Management Bureau Staff (see list of preparers) Date: June 2, 2025

Finding

Alternative Selected

After reviewing the project objectives, the project's proposed alternatives, public comment and resource specific environmental analysis, I have selected to implement the action alternative.

Significance of Potential Impacts

The following information was used to determine the potential for significant impacts:

- 1. Public scoping comments and issue statements developed from both public comments and resource specialists.
- 2. Geographic scope and scale of the proposed action including duration, timing and intensity of these actions.
- 3. Relevant plans, permits, rules and laws
 - a. State Forest Land Management Plan
 - b. Administrative Rules for Forest Management
 - c. Montana DNRC Forested Habitat Conservation Plan
 - d. Montana DNRC Incidental Take Permit
 - e. Montana 2023 House Bill 883 and Montana Code Annotated 76-13-150
- 4. Individual resource effects analysis presented in this Environmental Assessment

After using the information gained from the above listed sources and project considerations, I find that the proposed actions, as presented, do not pose any likelihood of significant impacts.

Need for Further Environmental Analysis

EIS

More Detailed EA

X No Further Analysis

Environmental Assessment Checklist Approved By:

Name: Dan Rogers Title: Forest Management Bureau Date: 06/03/2025 Signature: /s/ Dan Rogers Attachment A – Maps



A-1: Timber Sale Vicinity Map

A-2: Treatment Units



Project Area and Thinning Units Phase 2 Implementation - 2025 and 2026 Basemap Credits: Esri, NASA, NGA, USGS, Montana State Library, Esri, TomTom, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USFWS

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Phase 2 Implementation - 2025 and 2026

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HB 883 Phase 2 - Stillwater State Forest Project Area and Thinning Units Phase 2 Implementation - 2025 and 2026

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Phase 2 Implementation - 2025 and 2026

TomTom, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS