Environmental Assessment Checklist

Project Name: No Tellum Timber Sale
Proposed Implementation Date: Spring, 2025
Proponent: Kalispell Unit, Northwest Land Office, Montana DNRC
County: Flathead

Type and Purpose of Action

Description of Proposed Action:
The Kalispell Unit of the Montana Department of Natural Resources and Conservation (DNRC) is proposing the No Tellum Timber Sale. The project is located 12 miles southwest of Marion, 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	**Section 16, T26N R25W**	**542**	**99**
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:

- Sanitize the stand of severe insect and disease infestation (such as dwarf mistletoe and bark beetles).
- Reduce fuels and hazards associated with wildfire to promote resiliency and protection for numerous nearby homes.
- Generate revenue for the Common Schools Trust.
- Promote and regenerate a healthy and productive forest.

Proposed activities include:

Action	Quantity
Proposed Harvest Activities	# Acres
Clearcut	
Seed Tree	
Shelterwood	
Selection	
Old Growth Maintenance/Restoration	
Commercial Thinning	
Salvage	
Sanitation	99
Total Treatment Acres	**99**
Proposed Forest Improvement Treatment	# Acres
Pre-commercial Thinning	
Site preparation/scarification	**58**
Planting	**33**
Proposed Road Activities	# Miles
New permanent road construction	
New temporary road construction	
Road maintenance	5.3
Road reconstruction	
Road abandoned	
Road reclaimed	
Other Activities	

Duration of Activities:	2 Years
Implementation Period:	Spring 2025

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:
  - 7/30/2024
- PUBLIC SCOPED:
  - The scoping notice was posted on the DNRC Website: https://dnrc.mt.gov/News/scoping-notices
  - Adjacent landowners and the statewide scoping list.
- AGENCIES SCOPED:
  - Montana FWP, Tribal agencies, USFWS.
- COMMENTS RECEIVED:
  - How many: 7
  - Concerns: Six of the seven comments stated specific concerns about the project. Four of these individuals were concerned/ seeking assurance on the maintenance of the main haul rout as it is the route utilized by many to access their homes. Two of these commenters also had concerns the DNRC were not harvesting enough acreage for fire protection for nearby residencies.
    The fifth comment was received during a verbal conversation. They explained their concerns about the future of the forest. And the sixth comment was from Montana FWP regarding concerns for wildlife habitat and requested that FWP be kept informed as the project develops.
  - Results:
    DNRC employees took the time to address each of the concerns given. Assurance has been provided that the DNRC will complete road maintenance during and after the sale is completed, as well as contributing to cost share agreements. An email was sent to those wanting the project to be expanded explaining that we cannot operate outside of state trust lands boundaries, and that some areas are excluded due to hydrological restrictions. Wildlife concerns would be address in the Environmental Assessment.

DNRC specialists were consulted, including:
Tim Spoelma, Silviculturist
Tony Nelson, Hydrologist
Justin Cooper, Wildlife Biologist
Patrick Rennie, Archaeologist

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

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

- **Montana Department of Environmental Quality (DEQ)-** DNRC is classified as a major open burner by DEQ and is issued a permit from DEQ to conduct burning activities on

state lands managed by DNRC. As a major open-burning permit holder, DNRC agrees to comply with the limitations and conditions of the permit.

- **Montana/Idaho Airshed Group-** The DNRC is a member of the Montana/Idaho Airshed Group which was formed to minimize or prevent smoke impacts while using fire to accomplish land management objectives and/or fuel hazard reduction (Montana/Idaho Airshed Group 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:
    - Replace current culvert with a larger one to allow fish passage for all species at all stages of life.

ALTERNATIVES CONSIDERED:

No-Action Alternative: No timber harvest activities would occur. Forest succession would continue to be influenced by the occurrence of natural events such as insect and disease outbreaks, windthrow, or wildland fire. No road maintenance or improvements would occur, except for those occurring on roads currently open to the public or those with existing easements.

Action Alternative: Timber harvest would occur, and 99 acres of a sanitation treatment would be implemented. Forest health and vigor would be improved in all treated acres, and fuel loading/ continuity in the wildland urban interface (WUI) would be reduced. Timber would be harvested using traditional ground-based logging systems. The transportation plan would utilize approximately 6.3 miles of existing road.

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:

Harvest Unit	Habitat Group	Fire Regime	Current Cover Type	Age Class (years)	DFC	RX	Acres
1	Cool and moist (westside)	Mixed	Western Larch/Douglas Fir	40-99	Western Larch/Douglas Fir	Sanitation	41
2	Moderately cool and moist (westside)	Mixed	Western Larch/Douglas Fir	150-199	Western Larch/Douglas Fir	Sanitation	19
3	Cool and moist (westside)	Mixed	Western Larch/Douglas Fir	100-149	Western Larch/Douglas Fir	Sanitation	5
4	Cool and moist (westside)	Mixed	Mixed Conifer	100-149	Western Larch/Douglas Fir	Sanitation	4
5	Moderately cool and moist (westside)	Mixed	Western Larch/Douglas Fir	100-149	Western Larch/Douglas Fir	Sanitation	25
6	Cool and moist (westside)	Mixed	Western Larch/Douglas Fir	100-149	Western Larch/Douglas Fir	Sanitation	4

Fire Hazard/Fuels: The entire project area can be classified as part of the wildland urban interface (WUI). There are several homes and power/telephone lines located in and adjacent to the project area. Regeneration has been overly successful in old harvest units, creating dense continuous fuels. The proposed silvicultural prescriptions aim to reduce the amount of fuel loading in the area as well as promote fire resistance and resilience

Insects and Diseases: The most prevalent concern in the project area is dwarf mistletoe, mainly affecting western larch. Each proposed harvest unit contains patches of varying sizes of heavily infested trees. Also effecting the stand is bark beetles attacking the Douglas-fir. Mortality from

the beetles are most often found in patches of mature Douglas-fir stands. The proposed silvicultural prescriptions have been designed to prioritize and manage these concerns.

Sensitive/Rare Plants: N/A

Noxious Weeds: Knapweed, Oxeye Daisy, and thistles are present in the project area.

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			Y	V-1
Insects/Disease			X			X				X			Y	V-2
Rare Plants	X				X				X					
Noxious Weeds		X			X					X			Y	V-3
Action														
Current Cover/DFCs		X				X				X			Y	V-4
Age Class			X			X				X			Y	V-5
Old Growth	X				X				X					
Fire/Fuels		X				X				X			Y	V-6
Insects/Disease			X			X				X			Y	V-7
Rare Plants	X				X				X					
Noxious Weeds		X				X				X			Y	V-8

Comments:

V-1: No treatment within the stand would leave fuel loading at its current state and allow for the possibility of a higher intensity fire, thus having less of a chance to control a fire.

V-2: Without silvicultural treatment, insects and disease (especially dwarf mistletoe and bark beetle) would continue to impact trees in the area.

V-3: The spread of noxious weeds may continue even in the absence of timber harvest activities due to open roads, easements, recreation, and public traffic throughout the project area.

V-4: The proposed silvicultural prescriptions are all designed to maintain or transition the stands from their current cover towards the desired future condition (DFC).

V-5: Impacts on age class will be variable due to harvest prescriptions. Healthy, disease-free regeneration is prioritized and promoted. In areas where disease is prevalent, more mature infected trees will be removed to enhance vigor for the next age class. In healthier areas, the preferred leave trees in each harvest unit are the largest and most dominant trees. Ultimately, the age class would not be significantly impacted or altered by harvest activities.

V-6: Timber harvest activities within the WUI would aid in fuel reduction by reducing vertical and horizontal continuity within the stand and promote the healthiest and most fire resistant/resilient tree species.

V-7: Silvicultural prescriptions have been created to aggressively target insect and disease issues, and to promote health and vigor of the residual stand. Infected and highly susceptible trees will be removed to stop/slow the further spread of insect and disease issues.

V-8: Timber harvest activities and associated road work may lead to an increase in the occurrence of noxious weeds.

Vegetation Mitigations:
DNRC plans to complete herbicide treatments of noxious weeds as seen needed for several years after harvest operations are completed. This will help control existing and any potential new occurrences of weeds that may be caused by harvest activities. All equipment would be cleaned and inspected prior to the start of work. The project area would be monitored for noxious weeds after harvest operations are complete.

Merchantable timber containing dwarf mistletoe will be harvested. If needed post-harvest, sub merchantable trees infected with dwarf mistletoe may require to be slash and piled.

Slash piles created from harvest operations would be burned within 1-2 years of those operations being completed. Overall, silvicultural treatments will help to reduce fuel continuity and fuel loading in the project area, which is classified as being within the WUI.

SOIL DISTURBANCE AND PRODUCTIVITY:

Soil Disturbance and Productivity Existing Conditions: The proposed project area has approximately 6.2 miles of existing road that would be proposed for use. Some of these roads are moderate standard forest roads, and several reaches are subdivision standard with a crushed gravel surface. Timber management has been conducted in the proposed project area since the 1950s, and the most recent timber sale in the project area was completed in 1980. Existing skid trails from the prior entry have mainly ameliorated due to root penetration and frost action and impacts from past entries are not readily apparent. No existing sources of erosion or sediment delivery were identified during field reconnaissance.

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**					
Erosion	**X**				**X**				**X**					
Nutrient Cycling	**X**				**X**				**X**					

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		
Slope Stability	**X**				**X**				**X**					
Soil Productivity	**X**				**X**				**X**					
Action														
Physical Disturbance (Compaction and Displacement)		**X**				**X**				**X**			**Y**	**S-1**
Erosion		**X**				**X**				**X**			**Y**	**S-2**
Nutrient Cycling		**X**				**X**				**X**			**Y**	**S-3**
Slope Stability	**X**				**X**				**X**					
Soil Productivity		**X**				**X**				**X**			**Y**	**S-4**

Comments:

S-1: Based on DNRC soil monitoring on similar soils with a similar harvest intensity, approximately 14% of area may be in an impacted condition (DNRC, 2006). This level is below the range analyzed for in the *EXPECTED FUTURE CONDITIONS* section of the *SFLMP*, and well within the 20-percent impacted area established as a level of concern in the *SFLMP (DNRC 1996)*. This level translates to a low risk of low direct, secondary and cumulative impacts to soil physical disturbance.

S-2: Low impacts to soil erosion are possible due to exposure of bare soil during yarding operations. Risk of erosion would be mitigated by implementing all applicable BMPs to harvesting activities.

S-3: Based on research by Graham, et. al. (1994), habitat types found in the project area should have 7-25 tons/acre of coarse woody debris for nutrient cycling. Currently, much of the proposed project area is at or near this range. Logging residue left on the ground as mitigation would likely have a positive effect on nutrient cycling and improve the project area over the current condition.

S-4: Soil productivity would be impacted by the use of ground-based machinery to yard timber. As stated in comment **S-1**, levels of ground disturbance are expected to be less than 14% with roads included, which is well below the range analyzed for in the EXPECTED FUTURE CONDITIONS section of the SFLMP, and well within the 20-percent impacted area established as a level of concern in the SFLMP (DNRC 1996). This level translates to a low risk of low direct, secondary and cumulative impacts to soil productivity.

Soil Mitigations:

- Operate ground-based equipment only during periods of dry, frozen or snow-covered conditions
- Space skid trails a minimum of 60 feet apart to minimize areas impacted by ground-based equipment

- Use existing skid trails if they are in suitable locations to minimize potential for cumulative impacts to soil physical disturbance
- Leave approximately 7-25 tons of woody material 3-inches in diameter or greater on the ground for nutrient cycling

WATER QUALITY AND QUANTITY:

No Tellum Creek is a class 1 stream that flows through the center of the proposed project area. It is perennial and contains fish. Several other class 2 channels were identified in the proposed project area by DNRC personnel, including a DNRC hydrologist, in 2024. Channels were found to be stable and not actively eroding.

Water Quality and Quantity Existing Conditions: Several stream crossing structures were identified with adequate capacity to carry a minimum 25-year recurrence flow. These sites are not a current source of sediment, being well vegetated and stable at the time of field review.

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**					
Water Quantity	**X**				**X**				**X**					
Action														
Water Quality		**X**				**X**				**X**			**Y**	**WQ-1**
Water Quantity		**X**				**X**				**X**			**Y**	**WQ-2**

Comments:

WQ-1: All requirements found in ARM 36.11.301-313, and ARM 36.11.421-427 would be implemented, where applicable. In addition, all applicable forest management BMPs would be implemented. These measures would minimize any potential risk of sediment delivery to a stream or draw and leave a low risk of direct, secondary or cumulative impacts to water quality.

WQ-2: There is a very low risk of any proposed activities leading to increases in water quantity sufficient to destabilize any project area stream channel due to the low intensity of the proposed harvest prescriptions.

Water Quality & Quantity Mitigations:

- Avoid use of ground-based equipment in the bottoms of draws to reduce risk of scour, compaction or routing of surface runoff in draws
- Implement all applicable BMPs and SMZ Law rules to ensure protection of project area streams

FISHERIES:

Fisheries Existing Conditions: One class 1 stream channel was identified in the proposed project area during field reconnaissance. No Tellum Creek was surveyed by DNRC personnel in 2024 during field reconnaissance. These surveys identified Westslope cutthroat trout in No Tellum Creek above the reservoir. A stream crossing structure was identified on No Tellum Creek during field reconnaissance that is a likely fish passage barrier. The existing crossing is a 24" x 48" squash pipe. The pipe is likely a barrier to adult fish during low flow (due to low depth) and a barrier to juvenile fish during all flows.

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 (see Fisheries table below):

Fisheries	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Sediment	X				X				X					
Flow Regimes	X				X				X					
Woody Debris	X				X				X					
Stream Shading	X				X				X					
Stream Temperature	X				X				X					
Connectivity		X				X				X			Y	F-2
Populations	X				X				X					
Action														
Sediment		X				X				X			Y	F-1
Flow Regimes	X				X				X					
Woody Debris		X				X				X			Y	F-1
Stream Shading		X				X				X			Y	F-1
Stream Temperature		X				X				X			Y	F-1
Connectivity		X				X				X			Y	F-2
Populations	X				X				X					

Comments:

F-1: All possible low impacts would be mitigated by following all applicable rules found in ARM 36.11.301-313.

F-2: The crossing that is currently a fish passage barrier would be replaced as other sources of funding become available. This culvert would be replaced with a structure that meets fish passage parameters, but not as a direct result of this timber sale project. The structure would eventually be replaced with either a 54" round-equivalent squash pipe with approximately 12" of channel substrate installed, or with a 60" round culvert counter-sunk 2' and filled to 2' with channel substrate.

Fisheries Mitigations:

- Implement all applicable rules found in ARM 36.11.301-313

WILDLIFE:

Wildlife Existing Conditions: The 542-acre Project Area contains of variety of habitat conditions for native wildlife species, ranging from closed-canopy mature forest to young sapling stands. The DNRC-managed parcel that constitutes the Project Area is not included in DNRC's Habitat Conservation Plan (HCP) (*USFWS and DNRC 2010*). The Project Area is surrounded by private, U.S. Forest Service, and Flathead Ridge Ranch lands. Approximately 6.1 miles of roads are present within the Project Area. Open roads account for approximately 3.4 miles, and the remaining 2.7 miles are considered restricted roads. Restricted roads receive occasional motorized use for resource and fire-management purposes. Public motorized use of the open roads is high, and public non-motorized use of the restricted roads is likely high as well, especially during hunting seasons, due to their access from open roads, developed areas, and neighboring private residences. The Project Area sits south of McGregor Lake and contains multiple small streams, wetlands, and No Tellum Reservoir. The Project Area contains approximately 169 acres of mature forest (trees ≥9" dbh with ≥40% canopy closure). Mature forest occurs in long narrow corridors along stream management zones (SMZ) and riparian management zones (RMZs). Mistletoe is reducing host-tree vigor within almost all the mature western larch stands, and signs of mistletoe are present in the understory as well. There are 373 acres of sapling to pole-sized conifer regeneration within areas harvested around 1980. Overall, habitat conditions within the Project Area are adequate to support a variety of native wildlife species. Cumulative effects analysis areas (hereafter CEAAs) consist of lands near the Project Area and include a 5,169-acre area for smaller-ranged animals like pileated woodpeckers and a 64,217-acre area for animals that travel across larger areas such as grizzly bears and big game. Additional information on CEAAs and analysis methods are available upon request.

No-Action: 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 mature forest-associated species would likely remain similar or decrease (due to mistletoe or wildfire) compared to current conditions. Overall, in the absence of other natural disturbance, current wildlife habitat conditions would be expected to persist under the No-Action Alternative.

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)* Habitat: Recovery areas, security from human activity	**X**				**X**				**X**					**WI-1**

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
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**					**WI-3**
Sensitive Species														
Bald eagle *(Haliaeetus leucocephalus)* Habitat: Late-successional forest within 1 mile of open water	**X**					**X**			**X**					**WI-4**
Black-backed woodpecker *(Picoides arcticus)* 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**					**WI-5**
Fisher *(Martes pennanti)* Habitat: Dense mature to old forest less than 6,000 feet in elevation and riparian		**X**				**X**				**X**			**Y**	**WI-6**
Flammulated owl *(Otus flammeolus)*	**X**				**X**				**X**					**WI-3**

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Habitat: Late-successional ponderosa pine and Douglas-fir forest														
Peregrine falcon *(Falco peregrinus)* Habitat: Cliff features near open foraging areas and/or wetlands	**X**				**X**				**X**					**WI-3**
Pileated woodpecker *(Dryocopus pileatus)* Habitat: Late-successional ponderosa pine and larch-fir forest		**X**				**X**				**X**			**Y**	**WI-7**
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**	**WI-8**
Hoary bat (*Lasiurus cinereus*) Habitat: coniferous and deciduous forests and roost on foliage in trees, under bark, in snags, bridges		**X**				**X**				**X**			**Y**	**WI-9**
Townsend's big-eared bat *(Plecotus townsendii)* Habitat: Caves, caverns, old mines	**X**				**X**				**X**					**WI-3**
Big Game Species														
Elk		**X**				**X**				**X**			**Y**	**WI-10**
Moose		**X**				**X**				**X**			**Y**	**WI-10**
Whitetail		**X**				**X**				**X**			**Y**	**WI-10**
Mule Deer		**X**				**X**				**X**			**Y**	**WI-10**
Other														

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Mature Forest		**X**				**X**				**X**				**WI-11**
Northern Goshawk			**X**				**X**			**X**			**Y**	**WI-12**

Comments:

WI-1. Grizzly Bear – The Project Area is not in a recovery zone and is over 10 miles from the nearest recovery zone habitat (Wittinger 2002). While the occasional presence of a grizzly bear in the Project Area is possible, appreciable use by grizzly bears would not be expected due to low grizzly bear densities and distance from occupied grizzly bear habitat. As grizzly bears continue to expand their range outside of recovery zones, bears could occasionally travel and forage through the parcel during their long-range movements. For example, one male grizzly bear was recently observed within in the large cumulative effects area (Large CEAA) along the north side of McGregor Lake in 2018; however, this individual was captured and moved to the west side of Lake Koocanusa. Should any bears be in the area, they could be temporarily displaced by the proposed activities. Disturbance caused by harvesting activities would be additive to other human activities occurring in the surrounding Large CEAA. The greatest risks to bears within the Large CEAA would be conflicts with grazing livestock or attractants that bring bears into conflict with people. Mitigations included under the Action Alternative would require contractors to manage potential attractants to minimize conflicts.

WI-2. Canada Lynx – Approximately 99 acres of suitable lynx habitat (18.3% of the Project Area) would be altered by the proposed Action Alternative. Of these acres, 96 acres (18.6% of existing suitable habitat in the Project Area) would be treated with harvest prescriptions that would not retain enough conifer cover to continue providing suitable lynx habitat immediately post-harvest. To ensure that some forest structural attributes preferred by lynx and lynx prey (snowshoe hares) remain following harvest, patches of advanced regeneration and shade-tolerant trees would be retained within portions of existing suitable lynx habitat. Additionally, 7 to 25 tons/acre of coarse woody debris would be retained in accordance with DNRC Forest Management Rules (ARM 36.11.414) and retention of large, downed logs ≥15-inch diameter would be emphasized (ARM 36.11.428(4)(b)). Lynx habitat connectivity within the Project Area is currently high and include suitable summer foraging habitat from previous harvests over 40 years ago and narrow riparian corridors that consist of winter forage habitat for lynx. Lynx have not been observed within 15 miles of the Project Area over the past 10 years (MNHP 2024); however, occasional use of the Project Area by lynx is possible. The proposed Action Alternative would not appreciably reduce lynx habitat connectivity within the Project Area; however, connectivity on the surrounding lands is low due to small, irregularly shaped patches, interspersed unsuitable habitat types, heavy forest management, and adjacent agricultural land use. Any lynx that might be using the area could be temporarily displaced from the Project Area for up to three years by the proposed activities. Approximately 436 acres of suitable habitat would be retained in the Project Area but remain largely unconnected to suitable habitat in the surrounding 64,217-acre large cumulative effects analysis area (Large CEAA). The Action Alternative would slightly reduce potentially suitable lynx habitat from 8.4 to 8.2% within the Large CEAA. Disturbance/displacement and lynx habitat alteration by the proposed DNRC activities would be additive to forest management projects within the larger CEAA. Considering the small amount of harvest and the lack of recent observations at the scale of the Large CEAA, negligible effects to lynx in the Large CEAA would be expected.

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. Bald Eagle – Historically, there has been a bald eagle territory near McGregor Meadows, in which the home range includes portions the Project Area. The eagle hasn't been documented since 2014, and the last known nest was 2 miles from the Project Area. Eagles using the McGregor Meadows territory are likely habituated to a great deal of disturbance, as the nest is within 500 feet of an occupied home and 0.4 miles of U.S. Highway 2. In addition, the nest site is within 2 miles of McGregor Lake, which receives high amounts of recreational activity and motorized disturbance. Harvest activities associated with the Action Alternative would not occur adjacent to the lake and would not affect shoreline habitat. If the pair is active and using this area, temporary disturbance from motorized activities is possible within their home range.

WI-5. Common Loon – Suitable lake habitat occurs within the Project Area. Common loons successfully nested on No Tellum Reservoir during the 2024 breeding season. The loon nesting area is approximately 200 feet from any proposed harvesting. Harvest activities associated with the Action Alternative would not affect shoreline habitat, and motorized forest management activities (including road maintenance, timber hauling and site preparation) within a 500-foot radius of the nest site are prohibited between April 15 and July 15. A moderately traveled open road accesses the reservoir, and evidence of camping and recreational use was present. Additionally extensive recreational use of nearby McGregor Lake could be heard from this location. Loons using this lake 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-6. Fisher – Approximately 34 acres of suitable fisher habitat would be affected by the proposed activities (26.3% of potential fisher habitat in the Project Area). Approximately 32 acres (19.4% of suitable fisher habitat) would be converted to temporary non-suitable habitat post-harvest due to low amounts of remaining mature conifer cover. Harvest prescriptions on 2 acres would reduce habitat quality but retain sufficient large trees and crown closure to provide suitable fisher travel and foraging habitat post-harvest. Mature forest along several riparian areas continue to provide potential travel corridors in the Project Area. Across the broader area (CEAA), connectivity would not substantially change as existing suitable fisher habitat is largely absent from adjacent lands due to interspersed unsuitable habitat and past forest management. Mature forest cover along streams would offer limited connectivity outside the Project Area. To reduce potential adverse effects on fisher habitat, at least 2 large snags and 2 large snag recruitment trees per acre (>21 inches dbh, or largest size class available) would be retained (*ARM 36.11.411*). These snags are important habitat features that provide resting and denning sites for fishers. Proposed harvest would remove 3.9% of available fisher habitat leaving approximately 12.6% of lands in the Small CEAA as suitable habitat. Should any fishers be present within the Small CEAA, habitat alteration and potential disturbance would be additive to any activities occurring or planned on surrounding lands, including recent forest management on private lands. Considering the low availability of suitable habitat in the surrounding area, lack of any fisher observations within the Small CEAA (MNHP 2024), and prevalence of unsuitable habitat types, the likelihood of fishers using the Project Area or CEAA and being impacted by the Proposed Action is low.

WI-7. Pileated Woodpecker – The proposed activities would affect 55 acres of suitable pileated woodpecker habitat (27.6% of habitat available in the Project Area). Of these acres, 52 acres (26.3% of habitat available in the Project Area) would be treated with overstory removal, causing these stands to become unsuitable for nesting pileated woodpeckers post-harvest. The

remaining 3 acres, adjacent to existing mature forest not proposed for management, would undergo a thinning-type treatment and would likely remain suitable for pileated woodpeckers post-harvest, although fewer large trees and snags would be available for nesting and foraging. In these units, larger, healthy seral tree species would be retained. Combined with an additional 144 acres of mature forest available for foraging, the Project Area could continue to support breeding pileated woodpeckers. To reduce potential adverse effects on pileated woodpeckers, 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 all snags cut for safety reasons would be left in the harvest unit (*ARM 36.11.411*). Additionally, 7 to 25 tons/acre of coarse woody debris would be retained in accordance with DNRC Forest Management Rules (*ARM 36.11.414)* and retention of downed logs ≥15 inch diameter would be emphasized. Habitat availability within most of the Small CEAA is limited (17.4% of the CEAA) due to past timber harvesting and unforested habitat. In surrounding non-DNRC lands of the CEAA, suitable pileated woodpecker habitat is comprised of small, scattered patches. Proposed harvesting would affect approximately 6.1% of suitable habitat within the CEAA, of which 5.8% would be removed. Habitat alterations due to the proposed action would be additive to recent forest management projects on adjacent private lands within the Small CEAA.

WI-8. Fringed myotis – The proposed activities would affect approximately 50 acres of potential fringed myotis foraging habitat (29.5% of potential habitat within the Project Area). Because fringed myotis typically roost in Douglas-fir forests, roosting habitat would be disturbed by the proposed activities. Potential disturbance would only be expected from April through October, when fringed myotis are in Montana. After the conclusion of activities, continued use of harvested areas by fringed myotis 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 structure for foraging habitat. Should any fringed myotis be present within the Project Area, habitat alteration and potential disturbance would be additive to any activities occurring or planned within the Large CEAA. Fringed myotis are considered rare in northwestern Montana, and wind energy and diseases such as white-nosed syndrome pose threats to their population (Bachen et al. 2020).

WI-9. Hoary bat – The proposed activities would affect approximately 50 acres of potential hoary bat habitat. Hoary bats utilize both forested and open habitats and are considered common and widespread throughout Montana. Typically, hoary bats are solitary and roost among the foliage of trees during the day (Bachen et al 2020). If present, roosting bats could be temporarily displaced during timber harvesting. Potential disturbance would only be expected from late May through September, when hoary bats are in Montana. At least 2 large snags and 2 large snag recruitment (live) trees per acre (>21 inches dbh, or largest size class available) would be retained and could provide roosting habitat. After the conclusion of activities, continued use of harvested areas for foraging and roosting would be anticipated, thus low impacts to hoary bats would be expected.

WI-10. Big Game – The Project Area provides winter range habitat for white-tailed deer (DFWP 2008). Elk, mule deer, and moose may also use the area during other times of the year (DFWP 2008). The proposed timber harvest would remove 55 acres of thermal cover/snow intercept (29.2% of available) in the Project Area. Mature tree canopy cover would be reduced such that there would be little capacity of these stands to provide thermal cover during winter conditions. Thermal cover/snow intercept would remain on approximately 136 acres, or 25.0% of the Project Area. The proposed activities would impact approximately 99 acres, or 18.6% of available hiding cover in the Project Area. The proposed sanitation treatments would remove all

99 acres of hiding cover. Approximately 436 acres, or 80.4% of the Project Area, would remain hiding cover after harvest activities. No new permanent road would be constructed. Approximately 2.7 miles of existing restricted road within the Project Area would see a temporary increase in use. During all phases of the project, any currently restricted roads would be restricted from motorized-use by the public and remain closed after completion of project activities. The sanitation prescription would likely leave very little visual screening along approximately 1.3 miles of open roads, facilitating non-motorized human access combined with a reduction in hiding cover and could result in increased mortality risk to big game species due to hunting. Approximately 1.2% of thermal cover/snow intercept in the Large CEAA would be removed by the proposed harvest and thermal cover/snow intercept abundance would remain low (7.0% of the Large CEAA). Hiding cover would be reduced slightly from 70.7% to 70.6% of the Large CEAA and remain moderately abundant. Minor changes in movement patterns of big game in proximity to the Project Area could occur within the Large CEAA.

WI-11. Mature Forest – The proposed action would affect approximately 50 acres of mature forest (29.5% of mature forest within the Project Area). All these acres would be removed by harvesting. Connectivity of mature forest would remain low but be retained within the Project Area where it exists. Connectivity with adjacent mature forests on private, public, and commercial lands would remain limited within the Small CEAA, and mature forest abundance would remain low (12.5% of the Small CEAA). Mature forest within the Small CEAA is in low abundance due to 1,981 acres of extensive timber harvesting on surrounding commercial and public lands within the last 40 years (38.3% of Small CEAA). Changes under the proposed Action would be additive to the harvest activities at the broader spatial scale.

WI-12. Northern Goshawk – An active goshawk nest was discovered within a proposed harvest unit in 2024. Harvest operations would be prohibited within ¼ mile of the nest site or to the nearest open road from April 1 to August 15 (if the nest is found to be active each breeding season). Proposed harvesting adjacent to this nest will be conducted during the winter months, outside of nesting season. A protective buffer will be left around the nest tree if needed to ensure that the nest tree is not taken. Occupancy status and nest location would be surveyed in the spring to ensure that the correct area is protected with timing restrictions. Proposed harvest adjacent to the nest would likely displace nesting goshawks to stands with a greater density of mature trees post-harvest. Thus, considering that timing restrictions would be implemented to reduce potential for disturbance and that displacement is likely, moderate adverse direct and secondary impacts and minor cumulative effects to northern goshawks would be anticipated as a result of the Action 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)*.
- Effectively close all restricted roads and skid trails in the Project Area via a combination of gates, berms, rocks, and stumps.
- Retain some scattered patches of advanced regeneration where practicable and available.

- Retain at least 2 snags and 2 snag recruits per acre >21 inches dbh or the next 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 7-24 tons/acre of coarse-woody debris and emphasize retention of 15-inch diameter downed logs, aiming for at least one 20-foot-long section per acre. High-hazard cleanup areas adjacent to private lands are exempt from this mitigation.
- Protect the goshawk nest tree.
- Avoid prolonged administrative motorized activities within sight of the goshawk nest tree.
- Prohibit motorized forest management activities (including road maintenance, timber hauling and site preparation) that utilize existing roads within the designated buffer surrounding the nest location between April 1 and August 15. Nesting activity will be checked annually by a DNRC biologist and timing restrictions will be relaxed if the nest site is not active or the nest is damaged/destroyed by natural causes.
- Limit construction of new permanent roads, structures, or permanent developments within a 500-foot radius of the loon nest site.
- Prohibit motorized forest management activities (including road maintenance, timber hauling and site preparation) within a 500-foot radius of the loon nest site between April 15 and July 15.

Literature:

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:
http://fwp.mt.gov/gisData/imageFiles/distributionElk.jpg
http://fwp.mt.gov/gisData/imageFiles/distributionMoose.jpg
wihttp://fwp.mt.gov/gisData/imageFiles/distributionMuleDeer.jpg
http://fwp.mt.gov/gisData/imageFiles/distributionWhiteTailedDeer.jpg

MNHP. 2024. Natural Heritage Map Viewer. Montana Natural Heritage Program. Retrieved on October 31, 2024, from http://mtnhp.org/MapViewer.

USFWS and DNRC. 2010. Montana Department of Natural Resources and Conservation Forested Trust Lands Habitat Conservation Plan, Final Environmental Impact Statement, Volumes I and II., U.S. Department of Interior, Fish and Wildlife Service, Region 6, Denver, Colorado and Montana Department of Natural Resources and Conservation, Missoula, MT.

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														
Smoke	**X**				**X**				**X**					
Dust		**X**				**X**				**X**			**Y**	**AQ-1**
Action														
Smoke		**X**				**X**				**X**				**AQ-2**
Dust		**X**				**X**				**X**			**Y**	**AQ-2**

Comments:
AQ-1: Dust may be created from public traffic on roads located in the project area.

AQ-2: Smoke will be created from pile burning, and dust may be created from log hauling.

Air Quality Mitigations:
Burning would occur only on days approved by the Montana/Idaho Airshed group and the DEQ. A test burn will be conducted to verify good dispersal. The DNRC will implement measures to mitigate dust created from log hauling operations as needed. These mitigations may include slow driving speeds, a restricted haul period, and/or application of dust abatement on road surfaces.

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**					
Aesthetics	**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		
Demands on Environmental Resources of Land, Water, or Energy	**x**				**x**				**x**					

Comments/ Mitigations:
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.

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

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 Project EA

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					
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					
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					
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					

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		
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**					

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.*

- N/A

Other Appropriate Social and Economic Circumstances:

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

No Action: The No Action alternative would not generate any return to the trust 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 $109,779 based on an estimated harvest of 764 thousand board feet (4,773 tons) and an overall stumpage value of $23.00 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: Kayla Johnson
Title: Management Forester
Date: 10/1/2024

Finding

Alternative Selected

Action alternative

Significance of Potential Impacts

I find that the impacts of the proposed action alternative as described in this Environmental Assessment are not significant. This Environmental Analysis has been completed for the No Tellum Timber Sale. After a thorough review of the EA, project file, responses/discussions with Department and outside specialists, Department policies, standards, and guidelines and the State Land Management Rules, I have made the decision to choose the action alternative. I believe this EA has provided a good approximation of what this project would accomplish. Harvesting timber from the project area would remove diseased and dying trees from the area, improve the health and vigor of the remaining trees, mimic natural disturbance patterns, and help move the forest towards more historic stand conditions and a future desired condition. Management activities would also help reduce fuel loading and continuity in the WUI, as well as generate revenue for the Common Schools trust.

Need for Further Environmental Analysis

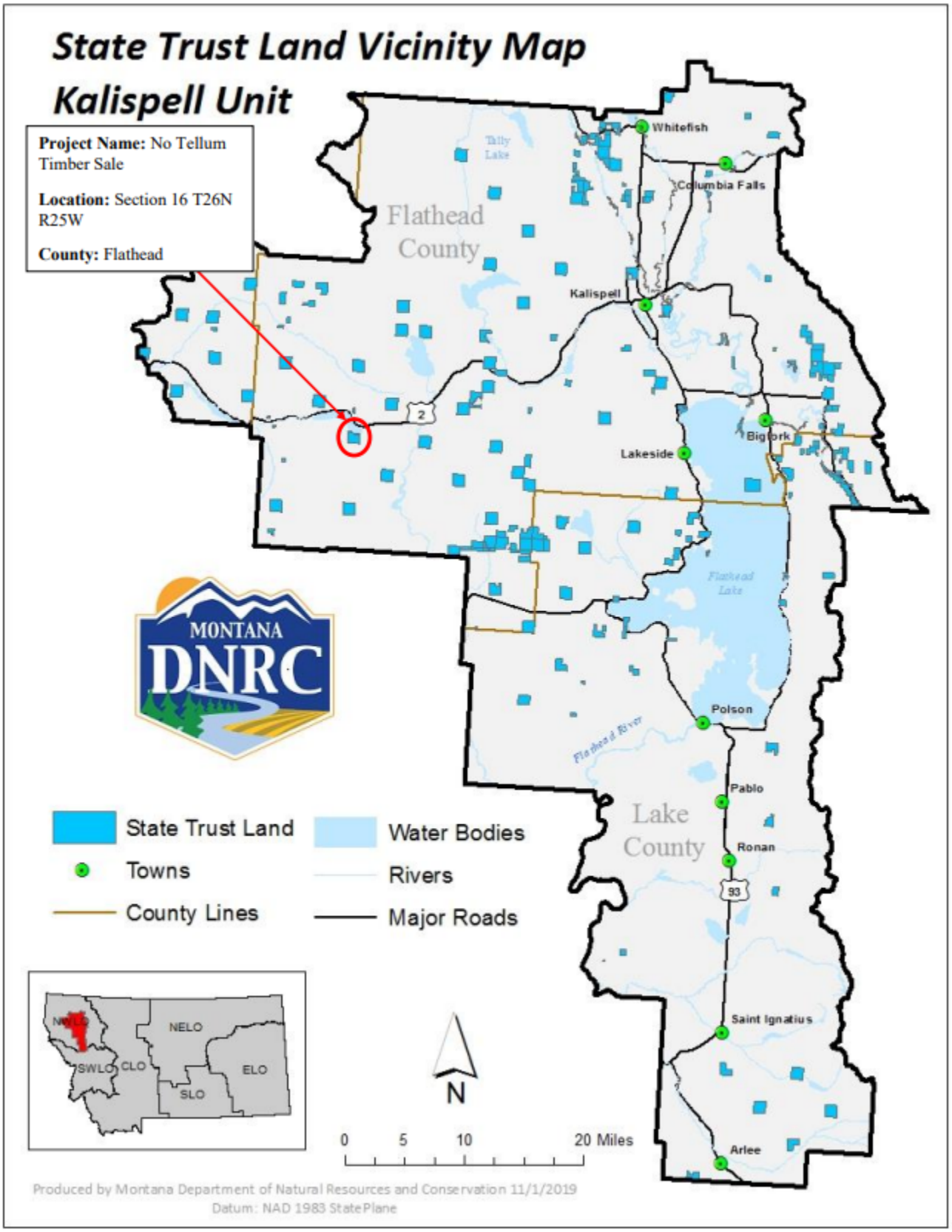
[ ]	EIS	[ ]	More Detailed EA	[X]	No Further Analysis

Environmental Assessment Checklist Approved By:

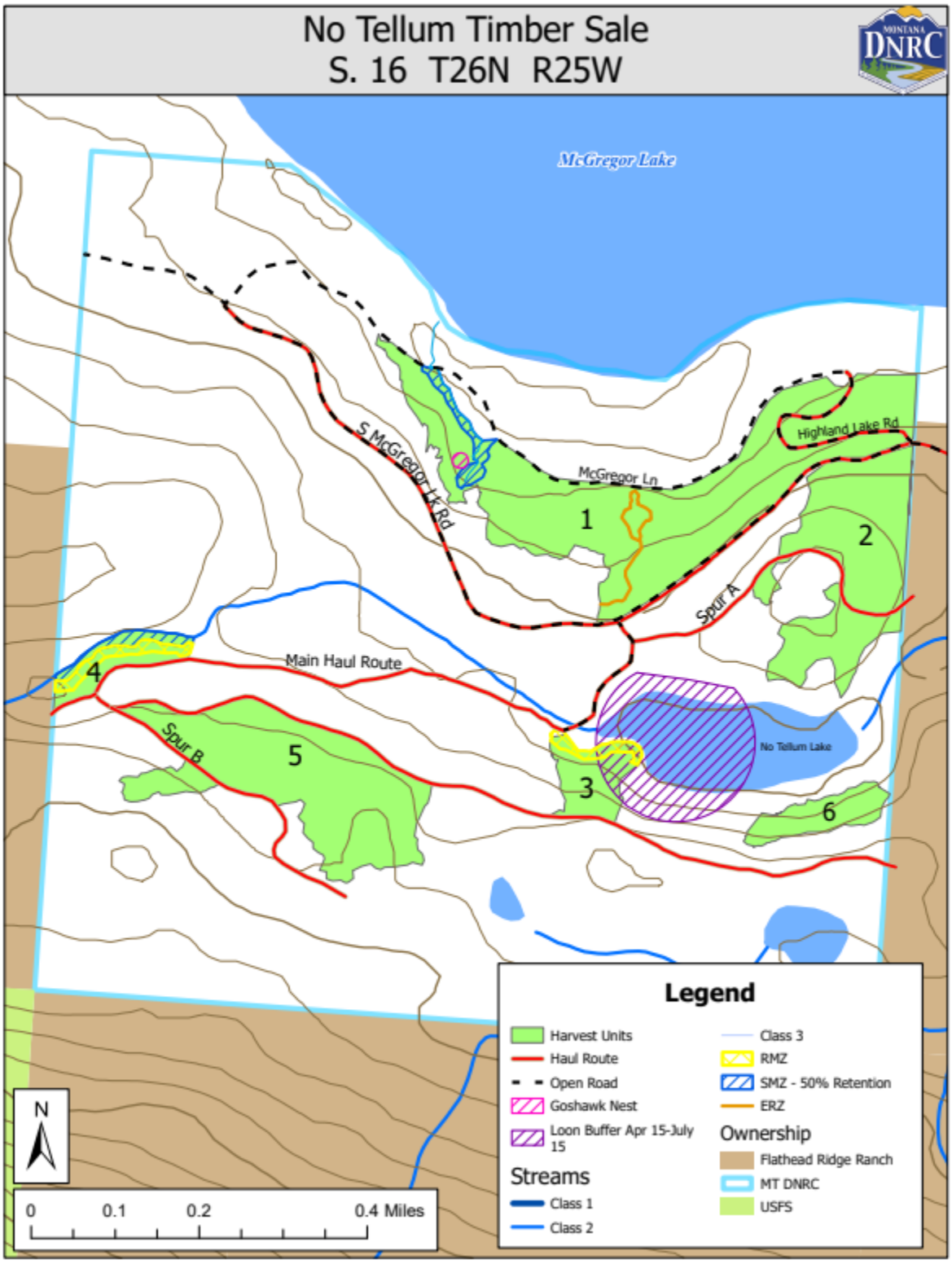
Name: David M. Poukish
Title: Kalispell Unit Manager
Date: November 25, 2024
Signature: /s/ David M. Poukish

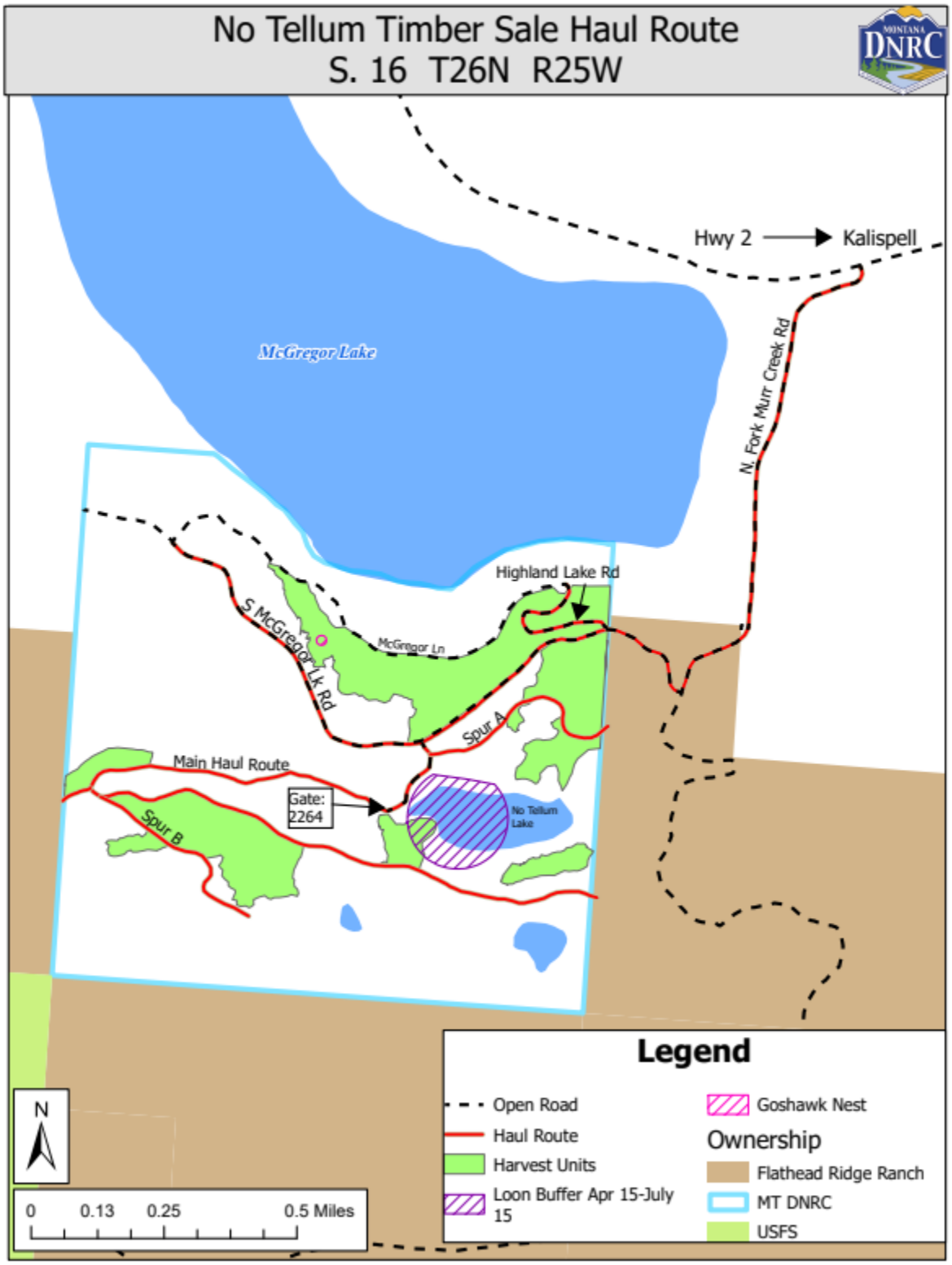
Attachment A - Maps

A-1: Timber Sale Vicinity Map



A-2: Timber Sale Harvest Units




No Tellum Timber Sale Haul Route
S. 16 T26N R25W
Hwy 2
Kalispell
McGregor Lake
N. Fork Murr Creek Rd
Highland Lake Rd
S McGregor Lk Rd
McGregor Ln
Spur A
Main Haul Route
Gate: 2264
Spur B
No Tellum Lake
N
0 0.13 0.25 0.5 Miles
Legend
Open Road
Haul Route
Harvest Units
Loon Buffer Apr 15-July 15
Goshawk Nest
Ownership
Flathead Ridge Ranch
MT DNRC
USFS