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Date: 18 July 2019

Ms. Piper Goessel
Physical Scientist
Payette National Forest
500 North Mission Street
McCall, ID 83638

Subject: Stibnite Gold Project Plan of Restoration and Operations (PRO); Forest Plan Consistency

Dear Piper:

Thank you for your May 1, 2019 email attaching the working draft LRMP (Forest Plan) consistency table that you indicated the Forest Service is using to summarize Forest Plan consistency considerations (“Table”), as part of the Forest Service NEPA and NFMA review process for the Stibnite Gold Project PRO. The Table is quite lengthy, referencing numerous different Forest Plan provisions, so it took us a while with the assistance of our consultant Tetra Tech and legal counsel to review the Table and prepare comments. We are providing you with comments in this letter and the attached annotated version of the Table that I believe will be helpful.

These comments are not exhaustive, and I understand that the Forest Plan consistency review process has progressed since our receipt of this information in May 2019. I propose that after your review of this letter and the attached version of the Table with appropriate members of the Forest Service and AECOM teams that, as a next step, we soon meet to review a more recent version of this assessment and to cover any questions or other discussion items.

General Comments:

1. As recognized in the Project Notice of Intent to Prepare an EIS, the Forest Service decision regarding approval of the PRO extends to whether to require changes or additions to the portions of the PRO on national forest lands, and whether to approve amendments to the Payette National Forest Land and Resource Management Plan (“PFP”) or Boise National Forest Land and Resource Management Plan (“BFP”), if required to approve the final PRO. 82 Fed. Reg. 25759, 25760-61 (June 5, 2017). Both the PFP and BFP recognize that under the Mining Laws, 36 C.F.R. 228 Subpart A and other legal authority, the Forest Service is limited in applying standards, guidelines or other Forest Plan management direction to reasonable terms, conditions and measures to minimize or



mitigate effects on national forest lands from locatable mining activities. PFP, Ch. III, page III-4; BFP, Ch. III, p. III-4.

2. Forest Plan consistency requirements are subject to locatable mineral and other valid existing rights under NFMA and its implementing planning regulations. 16 U.S.C. § 1604(i); 36 C.F.R. § 219.15. The Forest Service has the discretion to include one or more Project-specific exemptions or other amendments to the Forest Plan(s) in its Record of Decision regarding approval of the Project PRO, to allow components of the PRO on national forest lands to proceed which would otherwise be inconsistent with Forest Plan direction, as well as the option of requiring reasonable modification of the PRO to achieve consistency. 36 C.F.R. § 219.15(c)(3), (4).

3. Under the Forest Service 36 C.F.R. 228 Subpart A regulations, “Operations” are defined as “All functions, work, and activities in connection with prospecting, exploration, development, mining or processing of mineral resources and all uses reasonably incident thereto, including roads and other means of access on lands subject to the regulations in this part, regardless of whether said operations take place on or off mining claims.” 36 C.F.R. § 228.3(a). All aspects of the plan of operations (PRO) are considered as part of the locatable mineral operation. For example, a gravel pit included in the PRO as supporting access or other components of locatable mineral operations should be considered as part of the locatable mineral right, and not a separate saleable common variety minerals action to which different Forest Plan standards may apply.

4. We recognize that the Table you provided is a working draft. In that regard and based on our review considering the above described points, we believe there is an opportunity, with respect to the items currently identified in the Table as needing a Forest Plan amendment and the much greater number identified in the Table as “pending analysis” or “unsure,” to greatly reduce the number of Forest Plan items determined to be applicable or requiring further analysis, and ultimately the number and character of Forest Plan amendments or PRO adjustments that may be needed for PRO consistency.

5. We recommend that the Forest Service consider as part of the PRO NEPA and NFMA review process a Project-specific amendment to the PFP and BFP that modifies both Forest Plans to incorporate the terms, conditions, and measures contained in the alternative regarding PRO approval that is selected by the Forest Service in the Project ROD, and which supersedes any PFP or BFP management direction that would conflict with the ROD selected alternative. This amendment would apply in conjunction with any more specific PFP or BFP amendments that the Forest Service would include in the Project ROD with respect to particular identified PFP or BFP standards and guidelines. This amendment would help assure clarity regarding Forest Plan consistency compliance, the EIS environmental effects analysis, and the mitigation and other measures that will apply to PRO implementation. This amendment is particularly appropriate to consider given the multitude of PFP and BFP standards and guidelines that the Table identifies as potentially applicable to the Project, many of which appear to be subject to differing interpretations regarding scope, applicability and overlapping and potentially contradictory requirements.



More Specific Comments Regarding Particular Items in the Table:

We asked Tetra Tech to complete a review of the items in individual rows in the Table and provide comments, which are included the annotated copy of the Table attached with this letter. Tetra Tech's review was focused on the standard and guidelines indicated in the Table where the applicability was uncertain or determined to be applicable (Column G = Yes or Unsure), not conforming with the Forest Plans (Column I = No, Pending Analysis, or Unsure), and where a plan amendment was indicated to be needed (Column N = Yes or Pending Analysis). Tetra Tech did not review standards and guidelines indicated by the USFS as not applicable (Column G = No), already conforming with the Forest Plans (Column I = Meets), or where a plan amendment was indicated as not needed (Column N = No). Tetra Tech included a new Column P in the spreadsheet identifying the reasoning why a particular standard or guideline would not require a plan amendment. Some common themes are reflected in that Column P:

1. The Project is a locatable minerals project. All of the activities identified in the PRO are necessary for the Project and should not be considered any other type of project. Specifically, the Project is not a saleable or leasable mineral, right-of-way, recreation, recreation use, travel planning, timber management, vegetation management, or personal firewood project. Standards and guidelines that are clearly directed at these types of projects, even if they generically refer to "management actions" are not applicable. This perspective is supported by 16 U.S.C. § 1604(i) and 36 C.F.R. § 219.15.
2. Several standards and guidelines reflect requirements of federal or state laws. The review should assume that Midas Gold will meet the requirements of the law. An example is the transportation of hazardous materials (row 115).
3. Where an exception is allowed with impacts (degradation) occurring for less than 3 years (rows 45 through 51, 86, and 191), the review should consider that construction of facilities will be stabilized immediately after construction and degradation will not continue once stabilization has been reached.
4. The Idaho Roadless Rule, 36 C.F.R. 294 Subpart C, specifically allows for access for mineral rights. Standards and guidelines in Inventoried Roadless Areas ("IRAs") or recommended wilderness do not apply to access for locatable minerals activities (rows 44, 151, 161, 330, etc.). Per the Roadless Rule "Nothing in this subpart shall affect mining activities conducted pursuant to the General Mining Law of 1872." 36 CFR § 294.25(b). Cutting of timber is allowed in an IRA where it is incidental to implementation of an activity not otherwise prohibited (such as locatable mineral operations).
5. "Motorized use" is a recreational activity term and does not apply to approved administrative uses. Motorized activities needed to implement the PRO will be approved and standards and guides prohibiting such uses do not apply (rows 97, 107, 351, etc.).
6. In many places, reasonable mitigation has been proposed, much of which is already in the PRO. We note also that additional mitigation measures have also been incorporated into Midas Gold's Modified Proposed Action (Mod PRO) document. The spreadsheet indicates that the



standards and guidelines will be met with the implementation of the mitigation, yet the spreadsheet indicates an amendment is needed or consistency is pending analysis. These should be changed to show the standard and guideline is met. See Column P for reasoning.

7. There are four areas where we concur that a Forest Plan consistency determination may depend on pending analysis:

- Determining if the visual quality objectives (“VQOs”) are met;
- Determining if impacts on outstandingly remarkable values in Wild and Scenic River corridors would occur. However, given the limited activity within these areas, it seems unlikely that outstandingly remarkable values will be adversely affected;
- Determining whether desired vegetation conditions of the large tree size class would be degraded and whether 20 percent of acres in a 5th field HUC as large tree size would be maintained (row 493). This standard appears to be directed at vegetation management but does not appear to be clearly limited. The Forest Service should evaluate whether these standards apply to a locatable minerals project, and if so, complete the analysis. We suspect this standard will end up being met if applicable.
- Determining whether the PRO avoids adverse effects on Threatened, Endangered, Proposed or Candidate (“TEPC”) plants or habitat. If disturbance of TEPC plants occurs, we do not anticipate that there would be a magnitude of impacts under the PRO that would qualify as a “likely to adversely affect” determination.

If you have questions or wish to discuss these comments further prior to scheduling the meeting I have proposed at the beginning of this letter, please let me know.

Sincerely,

Alan Haslam
Vice President, Permitting
Midas Gold Idaho, Inc.

Attachments:

Attachment A – Annotated Forest Plan Consistency Review Spreadsheet

cc: Dave Rosenkrance, USFS
Keith Lannom, USFS
Valerie Porter, AECOM
Anne Baldrige, AECOM
Bill Killam, AECOM
Todd Glindeman, Brown and Caldwell

PAU/BSF Forest Wide	Equipment acquisition shall conform to type of flow during and shall include the following: 1. The equipment shall be suitable for use in wetlands, swamps, and other areas with high water table. 2. The equipment shall be suitable for use in areas with high water table. 3. The equipment shall be suitable for use in areas with high water table.	Yes	Unknown	Amendment may be required if fully compliant is established.	Prior to obtaining RMA or required permits, RMA and PCA will coordinate acquisition to ensure right-of-way acquisition the required environmental survey for the Project Facilities. (Section 6.2.3)	N/A	N/A	Pending analysis	Does not apply. The RMA is not applying any RMA for this project. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	Where the surface to be excavated, and in cooperation with the State, Federal, and local governments, holder of water rights, and other interested parties, ensure that water diversion structures be at least 100 feet from the project site. The water right and the riparian right shall be the basis of the water right and the riparian right. The water right shall be the basis of the water right and the riparian right. The water right shall be the basis of the water right and the riparian right.	Yes	Unknown	May require amendment to water rights. Mitigation measures listed.	All features of the Sibley Gold Project have been designed to protect and enhance the fishery, including the water systems. Any change of water right or riparian right will be coordinated to support fish passage, with other appropriate designed and constructed structures or bridges. (PRD 6.2.3)	N/A	N/A	Pending analysis	Water diversion structures will be maintained to limit water withdrawal to the project site. The water right and the riparian right shall be the basis of the water right and the riparian right. The water right shall be the basis of the water right and the riparian right. The water right shall be the basis of the water right and the riparian right.
BO-21	Mechanical vegetation treatments, salvage harvest, prescribed fire, and other fire use shall be coordinated with the State to ensure that the area was established, or to achieve other objectives that are consistent with the RMA establishment record or management plan.	Yes	Unknown	No project components occur in FARA 2.2. However there is a potential for indirect effects. EIS will discuss impacts.	N/A	N/A	N/A	Pending analysis	Not applicable - The PRD is not a mitigation measure for mechanical treatments. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	Proposed actions beyond NEPA shall address the State Resource Management Plan to both address consistency with State Rules 310 and 311 of the Federal Water Pollution Control Act.	Yes	Known	NEPA analysis will be performed with this consistency. Federal compliance with applicable Federal Rules in 310 and 311.	N/A	N/A	N/A	Pending analysis	Addressed in the State Resource Management Plan. No Plan Amendment needed. Current regulations in place. Change Column 1 to "Yes".
PAU/BSF Forest Wide	Management actions that occur within occupied sensitive plant habitat will incorporate measures to reduce factors a disturbance to a within desired conditions, or restore where degraded.	Yes	No	PAU mitigation actions that are more robust than the terms of the guideline. Mitigation measures in addition.	Removal or disturbance of vegetation will be kept to a minimum by limiting the area of disturbance. The water practicable (PRD 6.2.3). After closure activities, when the need for additional water electric power treatments have been, NEPA will discuss the electric transmission line from the Sibley Gold Project to the site and water transmission over roads along this transmission line (PRD 6.2.3).	N/A	Unknown	Pending analysis	Project actions in occupied Sensitive plant habitat will incorporate measures to reduce factors a disturbance to a within desired conditions, or restore where degraded. During any cleared activities, should any other TPC or Sensitive plant species be located in the project area, the forest habitat will be identified and the project impacts will be identified. Other TPC, Sensitive, and Forest Health plant species in the habitat will be identified to the extent possible. When project activities are completed, the project impacts will be identified, including effects of the project, including the application of insecticides, herbicides, fungicides, or other treatments, will be avoided. Project actions in occupied Sensitive plant habitat will incorporate measures to ensure habitat is maintained in desired conditions, or restored where degraded.
PAU/BSF Forest Wide	All project activities shall maintain or enhance the State Resource Management Plan to both address consistency with State Rules 310 and 311 of the Federal Water Pollution Control Act.	Yes	No	May require additional to NEPA through the RMA, consistent with other water rights. NEPA analysis will be performed with this consistency. Federal compliance with applicable Federal Rules in 310 and 311.	N/A	N/A	N/A	Pending analysis	All project activities will maintain or enhance the State Resource Management Plan to both address consistency with State Rules 310 and 311 of the Federal Water Pollution Control Act. NEPA analysis will be performed with this consistency. Federal compliance with applicable Federal Rules in 310 and 311.
BO-18	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	Unknown	BO-18 is outside Project components. The EIS will consider the potential for indirect effects that could degrade aquatic, terrestrial, and watershed resource conditions. Impacts could exceed beyond 15 years and therefore the standard would require an amendment whether or not it is mitigated.	N/A	N/A	N/A	Pending analysis	The treatment will be not be PRD. Degradation will not occur for this timeframe (more than 15 years). See restoration will occur early and be ongoing. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU-13	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Both historically and newly disturbed areas will be stabilized and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	The treatment will be not be PRD. Degradation will not occur for this timeframe (more than 15 years). See restoration will occur early and be ongoing. Change Column 1 to "Yes". Change Column 1 to "Yes".
BO-19	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Vegetation and soil removal will occur in a manner that minimizes erosion and sedimentation. Disturbance of terrain and soil will be avoided where practicable. (PRD Section 6.2.3). Both historically and newly disturbed areas will be identified and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	The treatment will be not be PRD. Degradation will not occur for this timeframe (more than 15 years). See restoration will occur early and be ongoing. Change Column 1 to "Yes". Change Column 1 to "Yes".
BO-20	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Vegetation and soil removal will occur in a manner that minimizes erosion and sedimentation. Disturbance of terrain and soil will be avoided where practicable. (PRD Section 6.2.3). Both historically and newly disturbed areas will be identified and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	The treatment will be not be PRD. Degradation will not occur for this timeframe (more than 15 years). See restoration will occur early and be ongoing. Change Column 1 to "Yes". Change Column 1 to "Yes".
BO-20	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Vegetation and soil removal will occur in a manner that minimizes erosion and sedimentation. Disturbance of terrain and soil will be avoided where practicable. (PRD Section 6.2.3). Both historically and newly disturbed areas will be identified and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	The treatment will be not be PRD. Degradation will not occur for this timeframe (more than 15 years). See restoration will occur early and be ongoing. Change Column 1 to "Yes". Change Column 1 to "Yes".
BO-21	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Vegetation and soil removal will occur in a manner that minimizes erosion and sedimentation. Disturbance of terrain and soil will be avoided where practicable. (PRD Section 6.2.3). Both historically and newly disturbed areas will be identified and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	Look at PRD for info about existing and preventing erosion on roads. Degradation will not occur for this timeframe (more than 15 years). Change Column 1 to "Yes". Change Column 1 to "Yes".
BO-21	Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary (up to 3 years) or short-term (3-15 years) time periods, and must be designed to avoid degradation of existing conditions in the long-term (greater than 15 years).	Yes	No	PA approval of a mitigation is a management action. Impacts would exceed beyond 15 years and therefore the standard will require an amendment whether or not it is mitigated.	Vegetation and soil removal will occur in a manner that minimizes erosion and sedimentation. Disturbance of terrain and soil will be avoided where practicable. (PRD Section 6.2.3). Both historically and newly disturbed areas will be identified and needed and/or regulated in accordance with Forest Service and/or approved guidelines and standards at final landforms are available for reworking. (PRD 6.2.3)	N/A	N/A	Yes	Look at PRD for info about existing and preventing erosion on roads. Degradation will not occur for this timeframe (more than 15 years). Change Column 1 to "Yes". Change Column 1 to "Yes".
BSF Forest Wide	Where timber use in high elevation habitat characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	Yes	No	Barring, Baring to riparian forest through riparian forest habitat. Will be added as a mitigation measure and monitoring terms will be developed in the monitoring plan. Will be added through NEPA process. Compliance will be documented in the EIS and Wildlife Technical Report. Detail added as a mitigation measure.	N/A	N/A	N/A	Pending analysis	Project activities (including riparian forest) in high elevation habitat characteristics of a riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).
PAU/BSF Forest Wide	To address big game stress and enhance during critical nursing periods, thermal cover treatments on entire riparian ranges should be identified and managed during project planning and implementation. Management requirements or mitigation measures needed to maintain these conditions should be determined during NEPA/NEPA planning. As a general guideline, at least 15 percent thermal cover should be distributed on big game riparian ranges within this cover priority areas. Cover distribution requirements in a riparian forest should be determined during NEPA/NEPA planning.	Yes	No	Will be included as a mitigation measure.	N/A	N/A	N/A	Pending analysis	Mitigation requires no Plan Amendment will be needed. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	Prohibit measures for National Forest System trails should be included in the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	Yes	Unknown	Will be included as a mitigation measure.	N/A	N/A	N/A	Pending analysis	Mitigation requires no Plan Amendment will be needed. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	New facilities for storage of fuels and other materials shall be located outside of occupied TPC plant habitat.	Yes	No	PAU mitigation measure required at the extent of this guideline but details will be added to a mitigation measure. Compliance will be documented in the EIS.	Locate the fuel storage and fuel storage facility on the riparian forest riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	N/A	Unknown	Pending analysis	Mitigation requires no Plan Amendment will be needed. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	Design and implement projects within occupied habitat of the riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	Yes	Unknown	PAU mitigation measure required at the extent of this guideline but details will be added to a mitigation measure.	NEPA will be added to the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	N/A	Yes	Pending analysis	Mitigation will be applied. Change Column 1 to "Yes". Change Column 1 to "Yes".
PAU/BSF Forest Wide	Mitigation management actions within known nesting or denning sites of fish or game species if these actions would disturb the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	Yes	Unknown	Conduct an evaluation of the standard in relation to the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	NEPA will be added to the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	N/A	N/A	Pending analysis	Coordinate with USFS biologist and biologist to set facilities and determine timing restrictions.
PAU/BSF Forest Wide	Mitigation management actions within known nesting or denning sites of fish or game species if these actions would disturb the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	Yes	Unknown	Conduct an evaluation of the standard in relation to the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	NEPA will be added to the riparian forest characteristics of a riparian forest (including riparian forest) is required, riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period). Riparian forest will be maintained annually (for a 10-year monitoring period).	N/A	N/A	Pending analysis	Coordinate with USFS biologist and biologist to set facilities and determine timing restrictions.

PM/RFI Forest Wide	In-growth termination with brown active stand stands, identify patterns and retention areas within existing management planning where it is determined that the proposed activity is likely to degrade the stand habitat.	Yes	Unknown	There would be indirect loss of mature forest habitat. Continued planning and monitoring is required to maintain the stand in relation to the analysis, mitigation, and alternative treatments (in relation to the standard may vary by alternative).	Miner Gold will consult for the upgrade and construction of the water transmission pipeline in the Project site along the existing water corridor into the Project site. Miners Gold is currently reviewing additional alternatives for the construction. (PFO 6.2.3)	Mitigation would be required.	Pending analysis	Pending analysis	Mitigation will be required. Change Column 1 to "Forest" Change Column 10 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	Mitigate former-owned disturbances within existing logging plans of disturbances that displacement of wildlife while they are occupying those ranges.	Yes	No	Appropriate response through future forest management (see the Standard).	Miner Gold will minimize disturbance to wildlife habitat by maintaining a canopy closure, minimizing noise and light, and concurrently working to improve wildlife habitat. (PFO 6.2.18) Vegetation will be cleared only in those areas necessary for Project construction or proposed natural disturbance to the degraded forest practices. (PFO 6.1.10)	N/A	Pending analysis	Pending analysis	Mitigation will be required. Change Column 1 to "Forest" Change Column 10 to "Forest"
RFI Forest Wide	Active forest stands that meet the definition of old forest habitat for the applicable PFO will be approved if management actions are proposed to such stands in a way that will continue to meet the definition of old forest habitat.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	Miner Gold will review the definition of old forest habitat and keep it to a minimum by limiting the area of disturbance. In the worst case scenario, (PFO 6.2.13)	Forest stands that meet the definition of old forest habitat for the applicable PFO will be approved if management actions are proposed to such stands in a way that will continue to meet the definition of old forest habitat. Existing stand forest stands, such as riparian and forest vegetation layer (Tree Size Class, Canopy Cover, Dominance Type) will be kept to a minimum necessary for the project and approved, and re-vegetated if no longer required for riparian or other management activities.	Pending analysis	Pending analysis	Mitigation will be required. Change Column 1 to "Forest" Change Column 10 to "Forest"
RFI Forest Wide	Management actions within large or medium-use class forested areas (Appendix A Definition) that have the potential to contribute to the degradation of old forest habitat.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	Miner Gold will review the definition of old forest habitat and keep it to a minimum by limiting the area of disturbance. In the worst case scenario, (PFO 6.2.13)	Management actions within large or medium-use class forested areas that have the potential to contribute to the degradation of old forest habitat for the applicable PFO will not contribute to or degrade the maintenance of old forest habitat. (PFO 6.2.13)	Pending analysis	Pending analysis	Mitigation will be required. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	New authorized facilities shall be located outside of RCAs whenever possible. When new facilities must be located in RCAs, they shall be designed to minimize impacts to RCAs as required through avoidance or mitigation.	Yes	No	The forest service will include this issue as a condition of the approval. A mitigation plan will be developed to avoid the impact of this standard. Performance will be verified in the ES.	Miner Gold will design and locate closure related facilities to minimize disturbance of riparian, wetland and riparian habitats in the Project area and for all-site infrastructure such as the power line and access road corridor. (PFO 6.2.5)	New authorized facilities will be located outside of RCAs whenever possible. When new facilities must be located in RCAs, they shall be designed such that avoiding impacts to RCAs are mitigated. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"	Pending analysis	Pending analysis	Mitigation will be required. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	Locate new structures, support facilities, and roads outside RCAs whenever possible. When new structures, support facilities, and roads must be located in RCAs, they shall be designed to minimize impacts to RCAs as required through avoidance or mitigation.	Yes	No	Will be incorporated as a mitigation measure. ES must show that there will be no alternatives to locating facilities in RCAs.	Miner Gold will design and locate closure related facilities to minimize disturbance of riparian, wetland and riparian habitats in the Project area and for all-site infrastructure such as the power line and access road corridor. (PFO 6.2.5)	New structures, support facilities, and roads will be located outside RCAs whenever possible. When new structures, support facilities, and roads must be located in RCAs, they shall be designed such that avoiding impacts to RCAs are mitigated. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"	Yes	Pending analysis	New structures, support facilities, and roads will be located outside of RCAs whenever possible. When new structures, support facilities, and roads must be located in RCAs, they shall be designed such that avoiding impacts to RCAs are mitigated. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	Monitoring plans for reforestation and closure should be developed to confirm and evaluate the ability to mitigate negative effects to biological resources or riparian habitat. Monitoring should be evaluated and reported to modify plans and actions as needed to minimize negative effects to biological resources.	Yes	Unknown	Monitoring plans will be developed. The monitoring plans will include riparian habitat monitoring activities.	Stream monitoring. At a minimum, Miner Gold will monitor the surface channel of Meadow Creek over the Range Plan Development Phase Storage Facility and FIP to monitor fisheries, wetlands and riparian habitat damaged during operations. Surface water observations around the active FIP will include Meadow Creek around the FIP and Hanger Run. Other stream monitoring, operations and access closure activities. (PFO 6.2.1)	Monitoring plans will be developed. Monitoring plans will be developed to confirm and evaluate the ability to mitigate negative effects to biological resources or riparian habitat. Monitoring should be evaluated and reported to modify plans and actions as needed to minimize negative effects to biological resources.	Pending analysis	Pending analysis	This is not a requirement. Monitoring Plan will be developed. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	Where new facilities or practices have been identified as potentially contributing to degradation of riparian habitat, riparian habitat, or riparian habitat, facilities and practices shall be designed to minimize impacts to riparian habitat, change in management strategy, alternative, or discontinuation.	Yes	No	Will be included as a mitigation measure.	Miner Gold will review disturbance to wildlife habitat by maintaining a canopy closure, minimizing noise and light, and concurrently working to improve wildlife habitat. (PFO 6.2.18)	Where new facilities or practices have been identified as potentially contributing to degradation of riparian habitat, riparian habitat, or riparian habitat, facilities and practices shall be designed to minimize impacts to riparian habitat, change in management strategy, alternative, or discontinuation.	Pending analysis	Pending analysis	This is not a requirement. Mitigation will be required. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	For all project wide analysis, suitable habitat should be determined for sensitive areas on which the project area. Conduct a survey for those species with suitable habitat to determine presence. Document the rationale for not conducting surveys for during the CE/analysis period.	Yes	Unknown	Surveys for some sensitive species have been conducted in the Project area. Effects of the Project on suitable habitat for sensitive species will be assessed during the CE/analysis period.	Surveys would be conducted.	N/A	N/A	Pending analysis	Not applicable - a suitable habitat analysis is being done in the ES. No Plan Amendment needed for something that is being done. No Plan Amendment needed.
DO-10	Manage the South Fork Salmon River to its Recreation Classification, and provide for the flow of water and debris until the river is formally designated by Congress or released from further construction as a WHR and later from suitable.	Yes	Minor	N/A analysis will be performed in terms of ODFs are still being met at the opening of the SRB.	N/A	N/A	N/A	Pending analysis	Not applicable. Nothing in the PFO indicates that the South Fork Salmon River will not maintain its free-flowing status until ODFs. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-10	In Riparian corridors, mechanical vegetation treatments, including salvage harvest, may be used as long as ODFs are maintained within the river corridor.	Yes	Pending Analysis	Vegetation removal for project components is mechanical vegetation treatment, impact on ODFs will be determined through analysis.	N/A	N/A	N/A	Pending analysis	Not applicable. Nothing in the PFO indicates that the South Fork Salmon River will not maintain its free-flowing status until ODFs. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-10	Vegetation restoration or maintenance treatments - including mechanical, and prescribed fire - may occur where they: 1) Minimize or reduce adverse quality impacts to fully support benefits of use and habitat for native and desired non-captive fish species; or 2) Minimize or reduce habitat for native and desired non-captive fish species; or 3) Reduce risk of impacts from additional fish, invertebrates, and mammals.	Yes	No	Removal of vegetation for roads and other facilities would not be consistent with the standard. Recommended as an amendment to the standard.	N/A	N/A	N/A	Yes	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-20	In Riparian corridors, mechanical vegetation treatments, including salvage harvest, may be used as long as ODFs are maintained within the river corridor.	Yes	Pending Analysis	Vegetation removal for project components is mechanical vegetation treatment, impact on ODFs will be determined through analysis.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-20	Mechanical vegetation treatments, including salvage harvest, may occur where they: 1) Minimize or reduce adverse quality impacts to fully support benefits of use and habitat for native and desired non-captive fish species; or 2) Minimize or reduce habitat for native and desired non-captive fish species; or 3) Reduce risk of impacts from additional fish, invertebrates, and mammals.	Yes	No	The proposed project would occur in areas of BCR 100 with either direct or indirect effects. Will likely require an amendment because of riparian and/or water quality and habitat. The mitigation is not going to last degradation entirely.	N/A	N/A	N/A	Yes	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-20	Vegetation restoration or maintenance treatments - including mechanical, and prescribed fire - may occur where they: 1) Minimize or reduce adverse quality impacts to fully support benefits of use and habitat for native and desired non-captive fish species; or 2) Minimize or reduce habitat for native and desired non-captive fish species; or 3) Reduce risk of impacts from additional fish, invertebrates, and mammals.	Yes	No	Removal of vegetation for roads and other facilities would not be consistent with the standard. Recommended as an amendment to the standard.	N/A	N/A	N/A	Yes	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-21	In Riparian corridors, mechanical vegetation treatments, including salvage harvest, may be used as long as ODFs are maintained within the river corridor.	Yes	Pending Analysis	Vegetation removal for project components is mechanical vegetation treatment, impact on ODFs will be determined through analysis.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-21	Vegetation restoration or maintenance treatments - including mechanical, and prescribed fire - may occur where they: 1) Minimize or reduce adverse quality impacts to fully support benefits of use and habitat for native and desired non-captive fish species; or 2) Minimize or reduce habitat for native and desired non-captive fish species; or 3) Reduce risk of impacts from additional fish, invertebrates, and mammals.	Yes	No	Removal of vegetation for roads and other facilities would not be consistent with the standard. Recommended as an amendment to the standard.	N/A	N/A	N/A	Yes	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
DO-20	Mechanical vegetation treatments, including salvage harvest, prescribed fire, and wildland fire use may only be used to maintain values for which the area was established, or to achieve other objectives that are consistent with the BSA establishment record or management plan.	Yes	Unknown	No project components in BCR 100 MFC 2.1. However, the analysis will consider potential indirect effects to the BSA.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO is not a vegetation restoration or maintenance treatment. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	When a permit or opportunity to occur is managed to provide for user safety and to maintain user interests, water recreation management should recognize that some activities are not compatible with the river objectives and should be separated when needed to maintain user safety and water recreation experience.	Yes	Unknown	Needs to determine if water recreation activities would be impacted by the Plan. If it is, then the Plan will have to be amended to provide for user safety and to maintain user interests. There would be impacts on background users and downstream users who are currently using the river. Valley County & City have cooperative on maintenance of this ODF.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO does not provide water recreation opportunities. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	When resolving conflicts between water recreation user groups, appropriate consultation and negotiation should be given to riparian habitat and riparian habitat management objectives.	Yes	Unknown	Needs to determine if water recreation activities would be impacted by the Plan. If it is, then the Plan will have to be amended to provide for user safety and to maintain user interests. There would be impacts on background users and downstream users who are currently using the river. Valley County & City have cooperative on maintenance of this ODF.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO does not provide water recreation opportunities. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 10 to "Forest"
PM/RFI Forest Wide	Decisions to develop recreation facilities should be based on avoidance or mitigation of any of the following: 1) Operating efficiency; 2) The need to reduce recreation impacts from recreation facilities and activities; 3) The need to reduce recreation impacts from recreation facilities and activities.	Yes	Unknown	Applicable for actions that would cause the public to avoid meeting criteria. Compliance will be determined in the ES. Decision would be based on (i) avoided with water. Analysis should clearly demonstrate this rationale.	N/A	N/A	N/A	Pending analysis	Not applicable. The PFO is not proposing a new recreation facility. Change Column 1 to "Forest" Change Column 10 to "Forest"

FW/BNF Forest Wide	Do not allow collection of sensitive plants except for research or scientific purposes, under the direction of the Forest or Regional Board?	Yes	No	Will be incorporated in a mitigation measure.	N/A	Coordination with a Forest botanist will occur: • When designing and implementing management activities that may affect sensitive or FPC species in their habitats (FPC025, FPC026) • When developing specific lists for mitigation and avoiding for all areas where collection would occur, including in habitat for sensitive, FPC025, and/or FPC026 species. (FPC025, FPC026, FPC027) • Sensitive plants in their appropriate areas required to be collected as part of salvage or cooperative actions for unavoidable project impacts. A botanist permit will be obtained as part of this work. The Forest or Regional Board will be the authority for collection methods and other information. (FPC025) • When developing all insecticide and herbicide spray plans and associated burning plans to determine whether they may affect sensitive plants, Forest Managers, and other information. (FPC025, FPC026, FPC027, FPC028, FPC029) • Sensitive plants in their appropriate areas required to be collected as part of salvage or cooperative actions for unavoidable project impacts. A botanist permit will be obtained as part of this work. The Forest or Regional Board will be the authority for collection methods and other information. (FPC025) • When developing all insecticide and herbicide spray plans and associated burning plans to determine whether they may affect sensitive plants, Forest Managers, and other information. (FPC025, FPC026, FPC027, FPC028, FPC029)	Yes	Pending analysis	Sensitive plants would not be collected unless approved and FPC025, FPC026, FPC027, FPC028, FPC029
FW/BNF Forest Wide	To meet light, visibility of camps should be mitigated. There should be a general lack of visible ground disturbance.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	(FPC025) (FPC026) (FPC027) (FPC028) (FPC029)	Pending analysis	Pending analysis	This guideline is for timber harvest activities. The FPC is not a timber harvest plan. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Stump and harvest residue remaining after project completion should appear to be naturally occurring downed material in light. Downed material should be visually indistinguishable from live height, having physically remaining material in place for natural decay and dispersal (concentrations).	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	Stump and harvest residue remaining after project completion will be made to appear to be naturally occurring downed material in light and visually indistinguishable from live height, having physically remaining material in place for natural decay and dispersal (concentrations).	Pending analysis	Pending analysis	This guideline is for timber harvest activities. The FPC is not a timber harvest plan. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Most timber changes in light should be natural, with some natural simulated noise or natural appearing openings that are designed to mimic what you would expect to see.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	Most timber changes in light will be natural, with some natural simulated noise or natural appearing openings that are designed to mimic what you would expect to see.	Pending analysis	Pending analysis	This guideline is for timber harvest activities. The FPC is not a timber harvest plan. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Edge-line silhouettes in light, night, and light should not have unnatural appearing breaks along them.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	Edge-line silhouettes in light, night, and light will not have unnatural appearing breaks along them.	Pending analysis	Pending analysis	This guideline is for timber harvest activities. The FPC is not a timber harvest plan. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	In light, roads should only be visible for a short distance from the sensitive travel area or view path. Other visible temporary construction should occur gradually. The area is gradually and natural appearing activity are prohibited within the same year and mitigation is required.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	In light, roads will only be visible for a short distance from the sensitive travel area or view path. Other visible temporary construction should occur gradually. The area is gradually and natural appearing activity are prohibited within the same year and mitigation is required.	Pending analysis	Pending analysis	This guideline is for timber harvest activities. The FPC is not a timber harvest plan. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	New road construction should not occur within the same year within and Forest Board designated areas.	Yes	Unknown	Compliance will be documented in the ES. New Road to accommodate a general road corridor now in the ES to be dealt with the later landscape NEPA.	N/A	N/A	N/A	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	During the permit process, construction may be allowed to progress through existing or existing sites within the same year within and Forest Board designated areas.	Yes	Unknown	Compliance will be documented in the ES. More data needed.	N/A	N/A	N/A	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Facilities identified as necessary at least with the surrounding landscape character and the RDS setting.	Yes	No	This will be incorporated in a mitigation measure.	N/A	All projects and activities will maintain or enhance the adjacent RDS character. If information and interpretive services at displays are used, they will be consistent with the RDS character. Facilities will be designed with the surrounding landscape character and the RDS setting. RDS components that are not to be used to help guide facility development within each RDS class.	Pending analysis	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Information and interpretive services or displays should be consistent with the RDS class.	Yes	No	Will be incorporated in a mitigation measure.	N/A	All projects and activities will maintain or enhance the adjacent RDS character. If information and interpretive services at displays are used, they will be consistent with the RDS character. Facilities will be designed with the surrounding landscape character and the RDS setting. RDS components that are not to be used to help guide facility development within each RDS class.	Pending analysis	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	When opportunities to mitigate effects and land management practices causing degradation have been identified, consider mitigating through measures such as reforestation, closure, and change in management strategy, alteration, or discontinuance.	Yes	No	Will be included as a mitigation measure.	N/A	When opportunities to mitigate effects and land management practices causing degradation have been identified, the proponent will consider mitigating through measures such as reforestation, closure, and change in management strategy, alteration, or discontinuance.	Pending analysis	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Management activities and facility development in Forest Board designated areas should be consistent with the goals outlined in the corridor management plan.	Yes	No	Will be addressed in a mitigation measure. Compliance will be assessed in the ES. New Road to accommodate a general road corridor now in the ES to be dealt with the later landscape NEPA.	N/A	The Forest Board corridor management plan for the RDS class will be adhered to when developing specific trail management if this is used in road truck hauling.	Pending analysis	Pending analysis	This is a guideline. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	High-visibility high-visibility barrier areas are identified as not suitable for timber production. Wood products harvested from high-visibility barrier areas will not contribute to the ASD.	Yes	No	Compliance will be documented in the ES.	N/A	N/A	Pending analysis	Pending analysis	This is a timber products project. This is not applicable. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Regulate accessibility to road network to ensure that management planning to help assess effects of additional travel management decisions on site populations.	Yes	Unknown	Will be addressed in the ES process and Wildlife Technical Report will be submitted in the ES.	N/A	Wildlife will maintain disturbance to the habitat by considering a narrow corridor, increasing view and light, and conservatively working to improve wildlife habitat. (PMD 6.2.18) Vegetation will be cleared only in those areas necessary for Project activities in order to prevent natural habitat to the greatest extent practicable. (PMD 6.2.18)	Pending analysis	Pending analysis	This is not a travel management project. Consultation is required. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	When roads access points (RAP) on the larger size classes (L2, L3, L4) are identified as not suitable for retention in an activity area, and/or use classes may be utilized to meet desired bridge conditions (e.g., bridge, concrete, steel, etc.) and/or use classes should only be utilized when the resulting first-hand risk will remain within defined risk management objectives. The hazard risk as a result to both the activity area and adjacent area should be considered.	Yes	Unknown	See ES Design Report.	N/A	N/A	N/A	Pending analysis	This is not a mitigation project. This is a risk management project. This is not applicable. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Transport hazardous materials on the Forest in accordance with 40 CFR 171 in order to reduce the risk of spills of toxic materials and fuels during transport through RDS.	Yes	No	Will be incorporated in a mitigation measure. See transportation analysis and BMPs within the ES.	N/A	Hazardous materials on the Forest will be transported in accordance with 40 CFR 171 in order to reduce the risk of spills of toxic materials and fuels during transport through RDS.	Pending analysis	Pending analysis	This is not applicable. No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Roads and other recreation may be visible in night and light. Road should blend into the characteristic landscape of the landscape.	Yes	No	Will be addressed in a mitigation measure. Compliance will be assessed in the ES.	N/A	If roads and other recreation are visible in night and light, they will blend into the characteristic landscape of the landscape.	Pending analysis	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Roads and other recreation within the view zone may demonstrate light and night visibility. The visual characteristics should be compatible with the natural surroundings.	Yes	No	Will be addressed in a mitigation measure. Compliance will be assessed in the ES. Need to discuss definition of "compatible".	N/A	If roads and other recreation within the view zone demonstrate light and night visibility, the visual characteristics will be those of natural surroundings within the natural surroundings.	Pending analysis	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Roads and other recreation may demonstrate BMP areas. When viewed as background, the visual characteristics should be those of natural surroundings within the surrounding area. Efforts should be made to reduce shape contrast at any distance.	Yes	No	Will be addressed in a mitigation measure. Compliance will be assessed in the ES. Analyze needed to show whether contrasting visuals may occur.	N/A	Roads and other recreation may demonstrate BMP areas. When viewed as background, the visual characteristics will be those of natural surroundings within the surrounding area. Efforts should be made to reduce shape contrast at any distance.	Pending analysis	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	When a structure or facility is created for other than public use, the materials, color, and location should be chosen to reduce visual contrast of the structure.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	When a structure or facility is created for other than public use, the materials, color, and location will be chosen to reduce visual contrast of the structure.	Yes	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	The use of structural material colors and non-reflective surfaces should be considered for structures. An exception to this would be when the function of the structure is to be seen.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	The use of structural material colors and non-reflective surfaces will be considered for structures. An exception to this would be when the function of the structure is to be seen.	Yes	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW/BNF Forest Wide	Natural or neutral colors should be used to help to camouflage them with the landscape.	Yes	No	Will be addressed in a mitigation measure, compliance document in the ES.	N/A	Natural or neutral colors will be used to help structures blend with the landscape.	Yes	Pending analysis	This will be addressed in mitigation measure (see column 1). No Plan Amendment needed. Change Column 1 to "Forest" Change Column 2 to "Yes" Change Column 3 to "Yes" Change Column 4 to "Yes"
FW-10	Prescribed fire and wildland fire use may be used as a large area are consistent with the corridor.	No	N/A	Wildfire management is part of project.	N/A	N/A	N/A	No	No
BO-20	Wildland fire use and prescribed fire may only be used when they are necessary to meet the quality needed to fully support beneficial use and habitat for native and desired non-native species, or if necessary to reduce habitat for native and desired non-native species and plant species.	No	N/A	Wildland fire and prescribed fire are part of project.	N/A	N/A	N/A	No	No

BC-1B	MPC 3.1 portion of the Warm Lake Field subwatershed area is not delineated through the project-level NEPA analysis and related Biological Assessment that: a) For resources that are within their range of diurnal conditions, the addition of a new road or landing in an RCA shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and b) For resources that are in a degraded condition, the addition of a new road or landing in an RCA shall not further degrade nor result in a net loss of resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats. An exception to this standard is where construction of new roads in RCAs is required to respond to preservation subsistence rights, subsistence or health, or respond to emergency situations (e.g., wildfire threatening life or property, or search and rescue operations).	No	NEA	The project meets the definition of an exception under the relevant Act of 2021 (General Mining Act of 2021)	NEA	N/A	N/A	No	
BC-1B	In the MPC 3.1 portion of the Warm Lake Field subwatershed area, proposed roads in Level 1 management areas or Level 2 roads that have become impassable unless they can be decommissioned through a project-level NEPA analysis and related Biological Assessment that: a) For resources that are within their range of diurnal conditions, proposed roads for use shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and b) For resources that are in a degraded condition, proposed roads shall not further degrade nor result in a net loss of resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats. When resources that are within their range of diurnal conditions, or in a degraded condition, an exception to this standard is where construction of new roads in RCAs is required to respond to preservation subsistence rights, subsistence or health, or respond to emergency situations (e.g., wildfire threatening life or property, or search and rescue operations).	No	NEA	BC-1B is outside Project components	NEA	N/A	N/A	Yes	
BC-1B	Implement the Forest Service approved protocols of the contractors or agency for chain-of-custody to maintain riparian positions and habitat of fish species.	No	NEA	The Fishes section of approved/agreed conservation strategy for Douglas (Attachment J. 31-10)	NEA	N/A	N/A	Yes	
BC-1B	Identify and avoid potential impacts to riparian and forest resources as shown in the following maps/tables (See Table on page 11-300 of the NEPA EIS)	Unclear	Pending Analysis	The relevant proposed project component is more than 3 miles from BCI 18-1B. The proposed project and alternatives are more than 1 mile from the Section 7000 Riparian or Wetland Buffer Plan. May require visual impact analysis (VIA) to determine whether it applies.	NEA	N/A	N/A	No	
BC-1B	For commercial salvage sales, retain the maximum number of logs depicted in Table A-6 within each size class unless a higher volume is available. Retain additional 100-200 inches DBH where available to maximize maximum total number logs are depicted in Table A-6. This standard shall not apply to management activities that are authorized either otherwise as a result of the protection of life and property during an emergency event, or necessary to protect other human health and safety concerns, to meet national fuel reduction objectives within WSA, or to clear material to maintain, improve, or create a stream to be reasonably expected or completed.	No	NEA	BC-1B is outside Project components	NEA	N/A	N/A	No	
BC-1B	Management actions, including salvage harvest, use and protection, fire risk development and implementation in a manner that maintains wilderness values, as defined in the Wilderness Act.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	Mechanical vegetation treatments, including salvage harvest, are prohibited.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	No new installation of mechanical items will be allowed, except where there is a need to respond to removal or maintenance, safety, or other needs.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	Existing mechanical equipment is to be removed only if it is not needed to respond to safety or other needs.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	Road construction or reconstruction may only occur where needed: a) To provide access related to removal or maintenance, safety, or other needs; b) To respond to safety or other needs; c) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	The full range of fire suppression strategies may be used to suppress wildfires. Fire suppression tactics should minimize impacts to wilderness values.	No	NEA	The proposed project and alternatives do not cross BCI 19 MPC 1.2.	NEA	N/A	N/A	No	
BC-1B	Prohibited fire use and wildland fire use may be used as long as OROs are maintained within the corridor.	No	NEA	Applicable to the project area but not the plan itself.	NEA	N/A	N/A	No	
BC-1B	The full range of fire suppression strategies may be used to suppress wildfires. Emphasize suppression strategies and tactics that minimize impacts to riparian, terrestrial, or watershed resources.	No	NEA	Applicable to the project area but not the plan itself.	NEA	N/A	N/A	No	
BC-1B	Road construction or reconstruction may only occur where needed: a) To provide access related to removal or maintenance, safety, or other needs; b) To respond to safety or other needs; c) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	No	NEA	No project components in BCI 20 MPC 2.2.	NEA	N/A	N/A	No	
BC-1B	The full range of fire suppression strategies may be used to suppress wildfires. Fire suppression tactics should minimize impacts to wilderness values for which the WSA was established.	No	NEA	No project components in BCI 20 MPC 2.2.	NEA	N/A	N/A	No	
BC-1B	Management actions, including salvage harvest, may only degrade riparian, terrestrial, and watershed resource conditions in the temporary time period up to 10 years, and must be designed to avoid resource degradation in the short term (1-15 years) and long term (greater than 15 years).	Unclear	Unclear	No project components in BCI 20 MPC 2.2, however the analysis will consider potential indirect effects.	NEA	N/A	N/A	Pending analysis	The timeframes will be met per FPCU. Degradation will occur for 10-15 years (more than 5 years). Site restoration will occur early and be ongoing. Change Column 1 to "Interim" Change Column 10 to "Yes"
BC-1B	Mechanical vegetation treatments, including salvage harvest, are only where: a) The responsible official determines that wildland fire use is prohibited fire use and is necessary to respond to removal or maintenance, safety, or other needs; and b) The treatment or removal activity is necessary to fully support riparian or wetland values, and does not create this species, or their stream or riparian habitat for which the WSA was established; and c) The treatment or removal activity is necessary to respond to removal or maintenance, safety, or other needs.	No	NEA	No project components in BCI 20 MPC 2.2.	NEA	N/A	N/A	Yes	
BC-1B	Wildland fire use and prescribed fire may only be used where there is a need to respond to removal or maintenance, safety, or other needs, or to address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	No	NEA	Wildland fire and prescribed fire is not part of project. No project components occur in MPA 3.1.	NEA	N/A	N/A	No	
BC-1B	Road construction or reconstruction may only occur where needed: a) To provide access related to removal or maintenance, safety, or other needs; b) To respond to safety or other needs; c) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	No	NEA	No project components in BCI 20 MPC 3.1.	NEA	N/A	N/A	No	
BC-1B	The full range of fire suppression strategies may be used to suppress wildfires. Emphasize suppression strategies and tactics that minimize impacts to riparian, terrestrial, or watershed resources.	No	NEA	Applicable to the project area but not the plan itself.	NEA	N/A	N/A	No	
BC-1B	Road construction or reconstruction may only occur where needed: a) To provide access related to removal or maintenance, safety, or other needs; b) To respond to safety or other needs; c) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	Yes	NEA	The plan is consistent with the terms of the plan-related work of the project with other (General Mining Act of 2021). However, some aspects (such as visible use of roads) that are not required to mining may not be covered by Item 6).	NEA	N/A	N/A	Yes	
BC-1B	The full range of fire suppression strategies may be used to suppress wildfires. Emphasize suppression strategies and tactics that minimize impacts to riparian, terrestrial, or watershed resources.	No	NEA	Applicable to the project area but not the plan itself.	NEA	N/A	N/A	Yes	
BC-1B	New road use hearings shall be required outside of RCAs to the MPC 3.1 portion of the Warm Lake Management Field subwatershed area of Warm Lake area as defined in the project-level NEPA analysis and related Biological Assessment that: a) For resources that are within their range of diurnal conditions, the addition of a new road or landing in an RCA shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and b) For resources that are in a degraded condition, the addition of a new road or landing in an RCA shall not further degrade nor result in a net loss of resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats.	No	NEA	The project meets the definition of an exception under the relevant Act of 2021 (General Mining Act of 2021)	NEA	N/A	N/A	No	
BC-1B	New roads shall not be built in the MPC 3.1 portion of the management area subwatershed of Warm Lake except to address emergency situations where there is a need to respond to removal or maintenance, safety, or other needs, or to address immediate response situations where, if the action is not taken, unacceptable impacts to hydrology, geology, riparian or terrestrial resources, or health and safety, would result.	No	NEA	No roads are proposed to be constructed. Downstream of Warm Lake (MPC 4.2).	NEA	N/A	N/A	No	

FW/BNF Forest Wide	During the project scale analysis and review, a Forest Botanist is provided to review the landscape spray plans and associated herbicide plans to determine whether registered effects to sensitive soil fauna, plants and their pollinators should be mitigated.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	Coordination with a Forest Botanist will occur: <ul style="list-style-type: none"> When designing and implementing management activities that may affect sensitive or TPC species or their habitats (BT002, BT004) When developing specific files for revegetation and seeding for all areas where reclamation would occur, including in habitat for sensitive, Forest Watch, and/or TPC plant species. (BT005, BT009) If sensitive plants or their propagules are required to be collected as part of salvage or restoration activities for unavoidable project impacts, a collection permit will be obtained as part of this work. The Forest or Regional Botanist will be the authority for collection methods and other information. (BT003) When developing all insecticide and herbicide spray plans and associated burning plans to determine whether degrading effects to Sensitive, Forest Watch, or TPC plants and their pollinators should be mitigated, and when developing mitigation for degrading effects of herbicides, fungicides, and/or rodenticides on these species or their habitats. (BT002, BT04 BT002) 	Yes	No	
FW/BNF Forest Wide	When a suitable and not cost-prohibitive, seed and plants used for revegetation or plantings in revegetation projects should originate from genetically local sources of native species. When project objectives (such as) require use of non native species, documentation regarding why non natives are utilized should be part of the revegetation process.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	Both historically and newly disturbed areas will be stabilised and covered and/or revegetated in accordance with Forest Service methods approved guidelines and standards as they will have an available for revegetation (PRO 6.2.3)	Yes	No	
FW/BNF Forest Wide	In cases where plant collection permits are issued, logging or physically removing whole plants should be discouraged in favor of collecting seeds or cuttings.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	If TPC or sensitive plants are likely to be described by the project, logging or physically removing whole plants should be discouraged in favor of collecting seeds or cuttings for propagation of plants in other areas.	Yes	No	
FW/BNF Forest Wide	Coordinate with Forest Botanist to consider sensitive species-habitat teams when designing and implementing management activities that may affect these species or their habitats.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	Coordination with a Forest Botanist will occur: <ul style="list-style-type: none"> When designing and implementing management activities that may affect sensitive or TPC species or their habitats. (BT002, BT004) When developing specific files for revegetation and seeding for all areas where reclamation would occur, including in habitat for sensitive, Forest Watch, and/or TPC plant species. (BT005, BT009) If sensitive plants or their propagules are required to be collected as part of salvage or restoration activities for unavoidable project impacts, a collection permit will be obtained as part of this work. The Forest or Regional Botanist will be the authority for collection methods and other information. (BT003) When developing all insecticide and herbicide spray plans and associated burning plans to determine whether degrading effects to Sensitive, Forest Watch, or TPC plants and their pollinators should be mitigated, and when developing mitigation for degrading effects of herbicides, fungicides, and/or rodenticides on these species or their habitats. (BT002, BT04 BT002) 	Yes	No	
FW/BNF Forest Wide	For projects of activities that include application of insecticides, herbicides, fungicides, or rodenticides, degrading effects on sensitive plant species will be mitigated.	Yes	No	No relevant approved approved mitigation measures.	N/A	Effects to TPC, Sensitive, and Forest Watch plant species and their habitats will be avoided, degrading effects of the project, including due to application of insecticides, herbicides, fungicides, or rodenticides, will be avoided. Forest Watch areas in occupied sensitive plant habitats will be managed to maintain habitat as maintained when it is, within cleared conditions, or restored where degraded.	Yes	No	
FW/BNF Forest Wide	In revegetation and seeding projects in occupied sensitive plant habitat, a Forest Botanist will be consulted to ensure appropriate species are used.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	Both historically and newly disturbed areas will be stabilised and covered and/or revegetated in accordance with Forest Service methods approved guidelines and standards as they will have an available for revegetation (PRO 6.2.3)	Yes	No	
FW/BNF Forest Wide	An interdisciplinary team resource advisor should be used to determine incident base and habitat success. This condition should be included in the Fire Management Plan.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	Coordination with a Forest Botanist will occur: <ul style="list-style-type: none"> When designing and implementing management activities that may affect sensitive or TPC species or their habitats (BT002, BT004) When developing specific files for revegetation and seeding for all areas where reclamation would occur, including in habitat for sensitive, Forest Watch, and/or TPC plant species. (BT005, BT009) If sensitive plants or their propagules are required to be collected as part of salvage or restoration activities for unavoidable project impacts, a collection permit will be obtained as part of this work. The Forest or Regional Botanist will be the authority for collection methods and other information. (BT003) When developing all insecticide and herbicide spray plans and associated burning plans to determine whether degrading effects to Sensitive, Forest Watch, or TPC plants and their pollinators should be mitigated, and when developing mitigation for degrading effects of herbicides, fungicides, and/or rodenticides on these species or their habitats. (BT002, BT04 BT002) 	Yes	No	
FW/BNF Forest Wide	When prescribed fire or wildland fire use occurs burn team members (FWA, FWMA, or FWMA) should be trained with the appropriate personnel and equipment to ensure a safe evaluation in accordance with the need for any rehabilitation measures.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	To minimize mechanical ground disturbance in RCA, prescribed fire and surface fire use should be considered under suitable soil, water, species, and socio-cultural conditions.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	Consider a full range of appropriate management responses, from wildland fire use that benefits responses, to full suppression.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	Informational information for wildland fire use described in the Fire Management Plan should include identification of sensitive ecological resources and social values. When it is determined that wildland fire use may degrade sensitive areas, prescriptions for wildland fire use should mitigate those effects.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	Direct ignition of prescribed fire in RCA should not be considered subject to scale effects analysis demonstrates that it would not degrade or impact structures or soil, water, species, and socio-cultural conditions. Refer to BT005 Standard for exceptions.	No	N/A	FW will be incorporated as a mitigation measure.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	Once a WFA is approved, incident team, camp, feedlines, staging areas, helipads, and other centers for incident activities shall be located outside RCA, unless the only suitable location for such activities is determined and documented by the fire officer or manager to be within an RCA, in which case the decision to place these activities inside an RCA is based on the fire officer or program manager safety or loss of life or property for structures at wilderness risk.	No	N/A	The standard/guidelines pertain to internal Forest Service management and is not applicable to the project.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	Once a WFA is approved, avoid delivery of thermal, radiant, heat, or additional fuel surface within RCA unless: A) The incident resource advisor determines that treatment safety for human life or protection of structures is at greatest risk. B) The incident resource advisor determines and documents an escaped fire would cause more degradation to RCA than would be caused by addition of thermal, heat or additional delivery to within sensitive RCA. In no case will the decision to use heavy equipment in RCA be based on the fire officer or manager determination safety or loss of human life or protection of structures is at greatest risk.	No	N/A	The standard/guidelines pertain to internal Forest Service management and is not applicable to the project.	N/A	N/A	N/A	No	
FW/BNF Forest Wide	In areas of existing extensive vegetation, mitigation for avoided weed prevention should be incorporated into seed, design, and project alternative evaluation.	Yes	No	FW will be incorporated as a mitigation measure.	N/A	Weed management practices are included in the Weed Management Plan, which will be updated in advance of project commencement.	Business weeds and undesirable non-native plants will be managed to prevent seed production and spread, in areas at existing extensive vegetation, mitigation for existing weed prevention will be incorporated into seed, design, and project alternative evaluation. Assessment to reduce the potential for spread and establishment of native weed infestations will be included in the updated Weed Management Plan.	Yes	No

FW/BNF Forest View	The FERC should be notified when projects are proposed for construction within the designated wilderness, which are not consistent with Forest management objectives and/or the National Forest System. It should be recommended to the FERC that preliminary permits and license bids for projects within areas recommended for wilderness, proposed Research Natural Areas, and riparian and suitable Wild and Scenic River segments until appropriate studies and/or legislative processes are completed.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	During licensing of new and existing facilities, conditions that require flow and habitat conditions that must be maintained or restored to meet resource and riparian integrity should be recommended to the Federal Energy Regulatory Commission (FERC) Review and Management of applications should be coordinated with the FERC and others. The FERC should be notified of projects that are inconsistent with the National Forest System.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	During licensing of new and existing facilities, the FERC, projects requiring that existing activity facilities be located such that degrading effects to other resources are mitigated should be recommended to the FERC. Where effective mitigation cannot be implemented, such facilities should be located.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Proposed new and previously unpermitted hydroelectric projects that have been approved by FERC should be evaluated on a case-by-case basis. The evaluation should consider beneficial use, environmental and social consequences, and resolution of conflicts with other resource objectives and activities.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Access to authorized improvements for recreation needs should be addressed as part of special use authorizations. Where appropriate access is not addressed in existing authorizations, the authorizations should be amended to include it.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	The 2013 Western Regional Utility Climate Study or its successor, should be used as a reference document to guide when considering how to address climate change in planning and/or proposed major electric power utility corridors.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Consider the potential for flooding by installation of dams to cover future project determining costs associated with new structures such as dams and large bridges.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Where opportunities to mitigate operator use authorized facilities and practices causing degradation have been identified, consider mitigating through measures such as reforestation, closure, and changes in management strategy, activities, or discontinuance.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Land assessments shall be consistent with Forest Plan goals and objectives, and shall consider the goals and objectives for Rights of Way.	Yes	Meets	Yes	Additional work (FCO or MOU) does not currently have ROW or easement access for most projects to be approved via the 2013-2018 easement bid process. The project is a plan of operations, which is currently in review. ROW or easement needs would be communicated and worked through the design process. (Director PSD-4.2)	NA	NA	NA	No
FW/BNF Forest View	Locate and post Wetland or Forest System boundaries before implementing management activities near or adjacent to riparian base or other lands not under Forest Service management.	Yes	Meets	Yes	This will be incorporated as a mitigation measure.	NA	NA	NA	No
FW/BNF Forest View	Locate and post wilderness boundaries before implementing management activities that require construction within nearby designated wilderness.	Yes	No	Yes	This standard may be applicable to the Burreed Basin within a close to the FC ROW boundary.	NA	NA	NA	No
FW/BNF Forest View	Include protection measures for riparian property boundaries and streams in all hydrologic, stream, and riparian management activities where the potential for disturbing property matters exists. Damage to or loss of riparian property boundaries and stream will be repaired by the appropriate party or management function.	Yes	No	Yes	The project is a plan of operations, which is currently in review. The need for additional permits is not currently known. However, ROW or easement needs would be communicated and worked through the design process. (Director PSD-4.2)	NA	NA	NA	No
FW/BNF Forest View	Do not accept special use authorizations applications that do not meet special use planning and application criteria, as prescribed in 36 CFR 251.34.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Review adequate levels of other security instruments for special use authorizations if it is not sufficient to ensure adequate performance that may require rehabilitation or when required to mitigate other performance.	No	Meets	Yes	No project facility outside the area covered by the FPO.	NA	NA	NA	No
FW/BNF Forest View	Use authority granted under Section 510 of the Federal Power Act to participate in FERC licensing processes for any project with the potential to affect hydroelectric generation.	No	Meets	Yes	The FERC licensing process will be followed as needed.	NA	NA	NA	No
FW/BNF Forest View	The conditioning authority granted under Section 510 of the Federal Power Act to ensure that hydroelectric facilities that may be located within RCA are located, operated, and maintained in a manner that requires degradation of forest resources.	No	NA	Yes	No hydroelectric development.	NA	NA	NA	No
FW/BNF Forest View	Small hydroelectric facilities that are granted easements from lands by the FERC shall be located, operated and maintained to require degradation of forest resources.	No	NA	Yes	No hydroelectric development.	NA	NA	NA	No
FW/BNF Forest View	Applications received before December 31, 2016 that request issuance of a permit or license for a qualifying agricultural water system under public law 94-162 (commonly called the "Duck Bill") shall be processed, subject to the conditions of the law.	No	NA	Yes	No such application.	NA	NA	NA	No
FW/BNF Forest View	Access to privately owned property recommended by National Forest System plans shall be provided, subject to reasonable terms and conditions, in accordance with National System Lands Conservation Act of December 2, 1980.	Yes	Meets	Yes	The plan assesses access to private landowners and users of public lands.	NA	NA	NA	No
FW/BNF Forest View	Where settlement needs, listing needs, or requirements are present, such should be located, designed, constructed and operated under the supervision of a professional engineer.	Yes	Meets	Yes	Plan measures are adequate to meet listing.	NA	NA	NA	No
FW/BNF Forest View	Include otherwise authorized, all garbage or refuse shall be removed from National Forest System lands.	Yes	Meets	Yes	Applicant-proposed design feature and include mitigation measure (see the text of this condition).	NA	NA	NA	No
FW/BNF Forest View	New forest for capital investments should be located on lands where the potential for mineral activities is high, at least initially high, within the foreseeable future.	No	NA	Yes	This standard/condition pertains to National Forest Service management and is not applicable to the project.	NA	NA	NA	No
FW/BNF Forest View	On National Forest System lands, where the Public Forest System, listing a new, permit, or license is not recommended where riparian activities are not from forest lands, project configuration, and quality production facilities—may result in irreversible or irretrievable conversion of surface resources. The design of proposed facilities should consider riparian considerations, using the appropriate evaluation criteria for the management activity involved.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Reclamation Bonds should be sufficient to ensure the full costs of reclamation, including Forest Service administrative costs, restoration of productivity, and maintenance of long-term physical, chemical, and biological stability. Approved plans should include requirements for regular (annual or biennial) review of bonds.	No	NA	Yes	This is an Internal FS management activity.	NA	NA	NA	No
FW/BNF Forest View	Permits and authorizations for operation and development of private utility networks shall be issued under conditions for controlling operating methods as to timing to prevent degrading effects to surface resources and values.	Yes	Meets	Yes	Check - are the proposed grid cells being treated as a whole or by watershed under the Plan? Will the new grid cells only be used for ROW for their route or will they be available to others? If only ROW then maybe this is just part of the POC but if public land has access then maybe it's a violation and the applicant needs discussion.	NA	NA	NA	No
FW/BNF Forest View	Common-wealth mineral activities will not be conducted on land allocations such as National Recreation Trails, Research Natural Areas, and other riparian or capital investments, including such as riparian.	No	NA	Yes	No common-wealth mineral activities.	NA	NA	NA	No
FW/BNF Forest View	Common-wealth and riparian mineral activities shall not be located and developed within RCA if such activities are not necessary and reasonable mineral values shall be located and developed to meet the best management or reclamation objectives of the Forest Plan, deemed necessary conditions and other reclamation is feasible.	Unclear	Unclear	Yes	Check - are the proposed grid cells being treated as a whole or by watershed under the Plan? Will the new grid cells only be used for ROW for their route or will they be available to others? If only ROW then maybe this is just part of the POC but if public land has access then maybe it's a violation and the applicant needs discussion.	NA	NA	NA	No
FW/BNF Forest View	Mitigate degrading effects from toxic metal mining operations situated within RCA by installing riparian resource protection for access, processing, and disposal facilities outside of RCA, where appropriate.	Yes	Meets	Yes	Will be addressed in a mitigation measure.	NA	NA	NA	No
FW/BNF Forest View	A Central Mineral Exercise (CME) shall review all proposed Plans of Operations in riparian resource areas to determine if necessary or unavoidable resource damage will occur. If it is determined that the proposed plan has the potential for resource damage, the CME will prepare a formal Surface Use Determination Report to be used in processing and approving the Plan of Operations.	Yes	Meets	Yes	The Riparian currently plans to combine this with an assessment from Sustainable CMRT. Discussion at this point is not to exceed the standard.	NA	NA	NA	No
FW/BNF Forest View	Regulate and maintain flows for all proposed mineral activities that will potentially cause significant surface disturbance and require reclamation.	Yes	Meets	Yes	Discussion will include requirements for reclamation bonding.	NA	NA	NA	No
FW/BNF Forest View	Access on and off mining claims shall be authorized where necessary for mineral development, Recreation, Recreation, and commercial use on and off mining claims shall be authorized through a Plan of Operations. When the development projects include roads, the NEPA process shall be used to analyze and evaluate proposed roads.	Yes	Meets	Yes	The regulations in this standard will be followed.	NA	NA	NA	No

FW/BNF Forest Wide	Fish passage will be provided at all proposed and recommended stream crossings of existing and potential fish-bearing streams unless protection of state stream native fish subspecies from contaminants, genetic contamination, or avoidance of genetic habitat is determined to be overriding management concern.	Yes	No	This will be incorporated as a mitigation measure.	Minerals will install and maintain water management infrastructure at all project sites with the primary objective of ensuring potential and riparian systems and streamflow. Stream crossings will be designed to maintain streamflow, prevent erosion and sediment generation, promote fish passage and maintain riparian habitat, and rehabilitating eroded areas of previous disturbance.	Fish passage will be provided at all proposed and recommended stream crossings of existing and potential fish-bearing streams unless protection of state stream native fish subspecies from contaminants, genetic contamination, or avoidance of genetic habitat is determined to be overriding management concern.	N/A	No		
FW/BNF Forest Wide	Do not authorize storage of fuels and other materials or refueling within TCEC areas there to be some alternative. Storage of fuels and other materials or refueling sites within TCECs shall be approved by the responsible official and have an approved spill containment plan consistent with the amount of fuel.	Yes	No	This will be incorporated as a mitigation measure.	Minerals will locate its truck stop and fuel storage facility on the proposed site that was previously used as the processing area for the previous trap line operations, after the project impacts have been adequately remediated, thereby reducing environmental impacts (PRO 2.2.1).	Storage of fuels and other materials or refueling will not occur within TCECs unless there are no other alternatives. Storage of fuels and other materials or refueling sites within TCECs will be approved by the responsible official and have an approved spill containment plan consistent with the amount of fuel.	Yes	No		
FW/BNF Forest Wide	Discretionary actions should avoid risks of forest lands, and actions where the Forest's disturbance is limited should receive priority effects that could lead to a TCEC.	Yes	No	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a risk matrix mitigation strategy will be assessed in the RIS.	Restoration or disturbance of vegetation will be kept to a minimum by limiting the area of disturbance, to the extent practicable, to meet the safe and efficient operations (PRO 2.2.1).	Effects to TCEC, Sensitive, and Forest-Wildlife plant species and their habitats will be avoided to the extent possible (FIGO-02, FIGO-03).	Yes	No		
FW/BNF Forest Wide	Management actions in occupied Proposed or Candidate species habitat should be limited or restricted if the effects of the actions would contribute to a forest land TCEC listing for those species.	Yes	Unclear	Impacts in occupied Proposed or Candidate species habitat will be avoided to the extent possible as per PRO 2.2.1. The BLM will make determinations for Candidate and Proposed species, and mitigation applied as necessary. IIS will document whether the Guidelines will likely be able to demonstrate compliance. IIS will need to provide rationale for deviation.	Restoration or disturbance of vegetation will be kept to a minimum by limiting the area of disturbance, to the extent practicable, to meet the safe and efficient operations (PRO 2.2.1).	Risk	N/A	Yes	Pending analysis	This is a guideline. Will be documented in SA, Change Column to "Yes".
FW/BNF Forest Wide	The forest should cooperate with USFS and BLM as appropriate. In providing information, data, and assistance for the development of management plans for species listed under the ESA.	No	N/A	The Guidelines pertain to Forest Management Actions.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	The forest should cooperate with USFS and BLM as appropriate. In providing information, data, and assistance for the evaluation of species that are proposed, or proposed to be listed under the ESA, and for evaluation of proposed critical habitat.	No	N/A	The Guidelines pertain to Forest Management Actions.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	Coordination with Forest management agencies to conduct TCEC habitat needs when designing and implementing management actions that may affect TCEC species and their habitats.	Yes	No	Will be addressed in a mitigation measure.	N/A	AGS will coordinate with Forest Service specialists to conduct TCEC habitat needs when designing and implementing management actions for any BLM TCEC species and their habitats.	N/A	No		
FW/BNF Forest Wide	During the project scale analysis and review, a Forest habitat should be reviewed to determine whether effects to TCEC plant species and their distributions should be mitigated through avoidance or minimization.	Yes	No	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a mitigation measure.	Only Forest Service approved herbicides will be used on lands administered by the Forest Service (PRO 2.2.1).	A Forest habitat will be coordinated with a Forest biologist and implementing management actions that may affect sensitive or TCEC species or their habitats (FIGO-03, FIGO-04).	Yes	No		
FW/BNF Forest Wide	Forest management actions should be designed to avoid or minimize effects to TCEC species and their distributions through avoidance or minimization.	No	N/A	The standard (Guideline) pertains to riparian Forest Service management and is not applicable to the project.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	Disposal and loading sites should be located to avoid occupied TCEC plant habitat.	No	N/A	No alternatives or timing restrictions would be considered as part of the project.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	Land exchange that would result in a net loss of quality or quantity of habitat for TCEC species should not be considered unless benefits of the exchange outweigh the benefits to those species in the long term.	No	N/A	Land exchange would not be considered as part of the project.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	The Federal Energy Regulatory Commission should be notified that hydroelectric projects in watersheds with TCEC fish species, and/or occupied TCEC plant habitat are consistent with Forest Plan management objectives when adverse effects can not be effectively avoided for plant species or assisted or reintroduced to TCEC fish species.	No	N/A	No hydroelectric development.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	Where the effort to do so was retained, proposed or existing sites of use activities should be assessed on a case-by-case basis. Where the effort to do so was not retained, proposed or existing sites of use activities should be assessed on a case-by-case basis. Where the effort to do so was not retained, proposed or existing sites of use activities should be assessed on a case-by-case basis.	No	N/A	The standard (Guideline) pertains to riparian Forest Service management and is not applicable to the project.	N/A	N/A	N/A	No		
FW/BNF Forest Wide	The Forest shall consult with the NOAA Fisheries and U.S. Fish and Wildlife Service (USFWS) to review and approve, to comply with consultation requirements under the Endangered Species Act and Migration-Nature Act.	Yes	No	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a mitigation measure.	Coordination and consultation with NOAA and USFWS would be done if necessary after receiving results of the Section 7 consultation (PRO Table 6.1).	Coordination with USFWS and NMFS will be completed per consultation requirements under the Endangered Species Act and Migration-Nature Act and Biological Assessments (BA) with intent of consultation, will be followed for the project.	Yes	No		
FW/BNF Forest Wide	For Forest-wide, watershed, or project-level Biological Opinions (BO) and Biological Assessments (BA) with intent of consultation, requirements shall continue to apply until the final action date unless they are otherwise specifically updated during further review with related regulatory agencies. Consistent with the intent of the BO and BA, the Forest will continue to apply the BO and BA until the final action date unless they are otherwise specifically updated during further review with related regulatory agencies.	Yes	No	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a mitigation measure.	Coordination and consultation with NOAA and USFWS would be done if necessary after receiving results of the Section 7 consultation (PRO Table 6.1).	Requirements for Forest-wide, watershed, or project-level Biological Opinions (BO) and Biological Assessments (BA) with intent of consultation, will be followed for the project.	Yes	No		
FW/BNF Forest Wide	For management actions that include application of herbicides, herbicide, fungicide, or insecticide, mitigation shall avoid or minimize adverse effects on TCEC species and their habitats.	Yes	No	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a mitigation measure. Compliance will be documented in the IS.	Only Forest Service approved herbicides will be used on lands administered by the Forest Service (PRO 2.2.1).	For management actions that include application of herbicides, herbicide, fungicide, or insecticide, mitigation will avoid or minimize adverse effects on TCEC species and their habitats. Herbicide use will be avoided to the extent possible and consistent with the BLM and Forest Service Wildfire Biological Opinion on the Boreas National Forest. Mitigation will be implemented as needed for forest plan compliance.	Yes	No		
FW/BNF Forest Wide	Forest management actions within occupied TCEC plant species habitat that would adversely affect listing risk persistence of those species.	Yes	Unclear	PRO mitigation measure matches part of the intent of this Guideline but details will be added to a mitigation measure. Impacts assessed through NEPA and ESA Section 7 consultation.	Restoration or disturbance of vegetation will be kept to a minimum by limiting the area of disturbance, to the extent practicable, to meet the safe and efficient operations (PRO 2.2.1).	Effects to TCEC, Sensitive, and Forest-Wildlife plant species and their habitats will be avoided to the extent possible. Where impacts to these species cannot be avoided, ongoing effects of the project, including disturbance of riparian, herbicide, fungicide, or insecticide, will be mitigated through actions to avoid sensitive plant habitat with riparian herbicide fungicide habitat is maintained which is within riparian corridor, or restore where degraded.	Pending analysis	Pending analysis	Will be documented in SA, Change Column to "Yes".	

BMF Forest Wide	When possible, projects should be designed to meet both sustainable fuel reduction and wildlife habitat conservation objectives. Standards WSP-28, WSP-29, WSP-30, and WPC specify dispersal timing and treatment that may be avoided for management activities within the wildland urban interface (WUI) where the authorized official determines that adherence to these standards would result in achievement of hazardous fuel reduction objectives. The authorized official has discretion to make this determination. NRC 4.2, 5, and 6.3 standard: The conventional salvage cut, which is at least the minimum number of snags depicted in Table A-6 within each site class where available. Where large snags (200 inches DBH) are unavailable, retain additional snags (20 inches DBH) when available to meet at least the maximum total number snags per acre specified in Table A-6. NRC 5.1, 5.2, and 5.3 standard: Mechanical vegetation management activities, including salvage harvest, shall retain all snags (20 inches DBH) and at least the maximum number of snags depicted in Table A-6 within each site class, where available. Where large snags (20 inches DBH) are unavailable, retain additional snags (20 inches DBH) when available to meet at least the maximum total number snags per acre depicted in Table A-6.	No	N/A	Forest Service implementation rules stated that this guideline is not applicable.	N/A		No		
BMF Forest Wide	Deferral as part of 2020 Forest Plan amendment for WLS.	No	N/A	Deferral Deadline.	N/A		N/A		
PMF Forest Wide	Maximum of three (3) percent of the acres within each forested PUG stand in a watershed (see Table A-6) will be large tree site class. (Production tree site class for PUG 10, riparian riprapped sites) where analysis of available data indicates that the large tree site class exceeds the site class in PUG 10 for a potential vegetation group in a watershed (see Table A-6). In less than 20 percent of the total PUG acres, management actions that do not exceed the current area occupied by the large tree site class, where applicable: a) Fire or other management actions that reduce the quality or quantity of large tree site class for a PUG within the S&P&E HUC will not contribute to habitat disturbance or conversion consistent with TDCS and M&S models in the short or long term, and b) Management actions that cause a reduction in the area occupied by the large tree site class would not impact or result in loss of desired vegetation conditions in the short or long term as described in Appendix A, including snags and coarse woody debris.	Yes	Learn	Continue evaluating this standard in relation to the effects, mitigation, and alternatives. Amendments in relation to this standard may occur by alternative.	Removal or disturbance of vegetation will be kept to a minimum by leaving the area of disturbance. In the event projects do require site use efficiency operations (PUG 4.3.1)	N/A	N/A	Final analysis	
TM/DMF Forest Wide	No game requirements for traps and for capture priority in the management of water range used in common by livestock and big game.	No	N/A	Livestock grazing management in lock a part of the Project.	N/A		N/A	N/A	No
PM/DMF Forest Wide	The public education and interpretation programs to focus on: address safety, and to promote management activities and positive recreation experiences.	Yes	N/A	Will be included as a mitigation measure.	N/A		N/A	Public education and interpretation programs will be coordinated with Bureau of Land Management, and to maintain environmental quality and enhance recreation experiences.	N/A
TM/DMF Forest Wide	Non-management activities, covering the period of time prior to having an approved wilderness management plan in place, shall be established once recommended wilderness areas are designated as wilderness.	Yes	N/A	This is an Internal Forest Service activity.	N/A		N/A	N/A	No
PM/DMF Forest Wide	Non-conforming uses in recommended wildlife areas shall not be processed.	Yes	N/A	This is an Internal Forest Service activity and apply only to recommended wilderness, which wouldn't be affected by the Project.	N/A		N/A	N/A	No
TM/DMF Forest Wide	State Off Road Motor Vehicle capital investment funds should not be so forced or used in recommended wilderness.	Yes	N/A	This is an Internal Forest Service activity and apply only to recommended wilderness, which wouldn't be affected by the Project.	N/A		N/A	N/A	No
PM/DMF Forest Wide	Mechanical treatment is recommended wilderness areas where currently none may be allowed to continue unless: a) It degrades wilderness values, b) Resource damage occurs, or c) User conflicts result.	Yes	N/A	This is an Internal Forest Service activity and apply only to recommended wilderness, which wouldn't be affected by the Project.	N/A		N/A	N/A	No
TM/DMF Forest Wide	Retention of RMA should be reviewed and adjusted as appropriate during project planning for proposed development projects within or adjacent to such areas. Consider potential effects, as well as habitat management, when making review and adjustments.	Yes	N/A	This is an Internal Forest Service activity and apply only to recommended wilderness, which wouldn't be affected by the Project.	N/A		N/A	N/A	No
TM/DMF Forest Wide	Changes to existing recreational settings (support RDS classes) are limited to only those that maintain or restore wilderness characteristics.	Yes	Learn	If any changes to tracked attributes or additional restrictions occur at 1940 line actions need to ensure.	N/A		N/A	N/A	Final analysis
TM/DMF Forest Wide	Suitability studies for eligible segments on the Forest should be coordinated with: a) Idaho Department of Water Resources where the State's Comprehensive Water Plans involve National Forest System lands. b) Bureau of Land Management for each study where eligible segments occur in both jurisdictions. The lead agency should be determined before the study begins.	No	N/A	This standard guideline pertains to internal Forest Service management and is not applicable to the project.	N/A		N/A	N/A	No
TM/DMF Forest Wide	Range (CR) for the classification of eligible, suitable, and designated WMA and State WMA considers as follows: a) Preservation to a Wild classification, b) Restoration to a State classification, c) Partial Restoration to a Recreational classification.	No	N/A	This standard guideline pertains to internal Forest Service management and is not applicable to the project.	N/A		N/A	N/A	No

Jessica's notes

> Table includes Standards and Guidelines only, not Goals or Objectives

> Table includes Standards and Guidelines that are not applicable to the project

> Information in "Notes" column came from USFS (PNF)

> "Design Feature" and "Mitigation Measure" can be blank if there is not a conformance issue

Means the item has been reviewed by USFS and their comments have been incorporated into the revised row

(blank)

Means not revised post USFS comment- some outstanding issue or discussion topic

	BOI-17	BOI-18	BOI-19	BOI-20	BOI-21	PAF-13
Warm Lake Road	X		X			
Powerline Upgrade	X		X	X	X	X
Burntlog Upgrade				X	X	
Substation			X	X	X	
Burntlog New Section						X
Mine Site						X
Powerline New Section					X	X
Johnson Creek Road				X	X	

BOI-17	BOI-19	BOI-20	BOI-21	PAF-13
5.1	3.2	3.2	3.2	3.1
	4.2		5.1	3.2