

Appendix C: Implementation Plan

South Otter Landscape Restoration and Resiliency Project Implementation Plan

Introduction

The Environmental Assessment (EA) describes the effects of proposed activities discussed in the **South Otter Landscape Restoration and Resiliency Project** area. This Implementation Plan is integral to the analysis of effects in the EA and the Selected Alternative in the Decision Notice (DN).

The Implementation Plan documents the process for implementation of the activities. This is meant to be a ‘living’ document and may need to be adjusted as we learn more through the implementation of each activity. As activities are designed, the process may be refined, and new technology or expertise may be used.

This plan outlines the process each activity will follow during implementation to ensure the effects are within the scope of the analysis in the EA, the activity is allowed under the Selected Alternative in the DN, and that all resource-specific guidelines and protection measures are incorporated into activity design. The Implementation Plan is an essential component of this project for accountability, tracking, decision- making, and documentation purposes. It must be considered alongside the Selected Alternative, effects analyses, activity cards, and the DN for the success of the project as a whole.

The Implementation Plan is designed to be consistent with the Custer Gallatin National Forest Land Management Plan (LMP). The intent is that this Implementation Plan will be used over a 20-year timeframe and updated as needed. A revision to the LMP would also necessitate a need to update this Implementation Plan.

The purpose of this document is to describe the implementation process for the South Otter Project. The primary goals are to:

- demonstrate that effects of implementation are within the scope of activities and the range of effects described in the EA and authorized in the DN;
- conduct a transparent implementation process that keeps the public and Tribes informed of and involved in activity location, timing, and design;
- continue the public sharing and collaborative learning that occurred during the planning phase, encourage and support the continuation of collaborative efforts throughout implementation;
- ensure that the forest continues the phased programmatic agreement with interested federally recognized Tribal Governments;

- ensure implementation of activities is responsive to dynamic on-the-ground conditions, new scientific information, and public/Tribal input;
- ensure integrated engagement of interdisciplinary team members, field resource specialists, line officers, Tribes and the public;
- focus on shared priorities and work to resolve concerns and solve problems related to selection and implementation of South Otter project activities; and conduct monitoring activities, interpret and share results, adapt implementation practices to improve results and better meet project objectives.

Tribal Consultation

Federally recognized Tribal Governments have a unique government-to-government relationship with the United States Government. As such, consultation with Tribes require a continuous process throughout project initiation, planning, design and implementation. Forest Service guidance encourages staff not only to meet the requirements of federal law, but to seek partnership with Tribal Governments wherever possible.

In order to improve consultation and coordination with federally recognized Tribal Governments the implementation plan will include the following measures:

1. The forest will host an annual workshop during the off-season (typically November to April) with all Tribes that have indicated an interest in consultation during the planning process.
 - a. This will be a separate workshop from those including the public and may include one or more Tribes. It will be held after the forest has held its public meeting workshop to ensure that all proposed refined activities are provided to the Tribe for consideration. The procedure of the workshop would mirror that of the public workshop.
 - b. The meeting will cover both the planned activities based upon the forest's public input, and will include any refined activity requested by the Tribe. Similar to the public meeting workshops, refined activities requested by the Tribe that fall within the scope of the EA's analysis will be placed in Project's Out-year Plan as "draft."
 - c. At a minimum, the line officer responsible for implementation of the project will be present at the workshop.
 - d. Depending on the wishes of the Tribe, the meeting may include the Tribal Council, a representative from the council, or a delegated member of the Tribal Government.
2. In order to ensure that Tribes are given an opportunity to consult on potential impacts an activity may have on historic properties, all phased consultation inventory reports will be sent to each tribe that has indicated an interest in consultation during the implementation phase. The manner of consultation is further elaborated on in the section of this document covering heritage resources.
3. The forest will encourage coordination and cooperation with Tribes through staff-to-staff interaction as long as such exchanges are acceptable to the Tribes. Any proposed activities that are derived from these interactions would go through the Tribal workshop process prior to implementation.

Implementation Process

Activities that occur under the authority of the DN may take several months to several years to go through all steps of the implementation process. Therefore, at any given time there may be several planned activities in different steps of the process. Each year, public involvement will occur to discuss proposed activities and provide updates for ongoing or completed activities. This will include workshops and other public involvement techniques to be able to reach a wide audience.

Process Steps:

1. Determine Activity to be Implemented
2. Check Against EA and DN
3. Check Against Activity Card
4. Obtain Line Officer Approval and Place in Out-Year Plan
5. Conduct Fieldwork and Consultation (if needed)
6. Line Officer Approval to Implement
7. Prepare Contract Documents
8. Implement
9. Monitoring
10. Adaptive Management

Step 1) Determine activity to be implemented

This implementation process starts when the Forest Service identifies an implementation area(s). An implementation area may align with the project area boundary or consist of a portion of the larger project area covered by the EA. During off season implementation workshops, the Forest Service, public and Tribes may present proposals for an activity covered in the EA. It is the expectation that at these workshops an array of activities that meet the project purpose and need and were authorized under the signed decision will be presented. The public, Tribes and the Forest may refine locations, treatment, design components, methods, mitigation measures, and integration opportunities through a collaborative process. Activities proposed must be analyzed in the EA and the effects must be within the thresholds analyzed for resources.

At each workshop, the public and Tribes will have the opportunity to submit, review, or discuss the following:

- Report status of activities already planned or in process of being implemented and current Out-year Plan;
- New proposed out-year activities;
- Evaluation and feedback on potential need for change in implementation program;
- Review recent monitoring results (such as from the LMP monitoring, the Forest's Implementation and Effectiveness Monitoring or implementation monitoring, step 9) that may relate to the activity and result in adaptations;

The public and Tribes would have the opportunity to:

- Have input on types and locations of activities, review maps for proposed activities;
- Evaluate, discuss, and recommend the priority sequencing of activities, treatment prescriptions and integration of activities for funding;
- Review updated maps of planned/in-process activities to provide feedback to Forest Service regarding prior-year management;

The Forest will publish a notice in the *Billings Gazette*, the project webpage, Custer Gallatin NF social media platforms, and post flyers on community bulletin boards within the project area for date / time of the workshop. An email will also be sent to the project's electronic and postal mailing list. Meeting location will be determined by proximity to the project area.

For the annual Tribal workshop meeting, the Forest will notify the Tribal Government through a letter or e-mail requesting a mutually agreed upon meeting location and time.

Following the workshop, activities that are recommended to be moved forward into implementation by the responsible official will be placed on the Project Out-year Plan as "draft." Maps and the unit table of the

proposed activities will be posted to the project website for additional review and feedback. The feedback period gives an opportunity for the public that may not be able to attend the workshops to provide their input on what, where and when activities are to be implemented before the activities are made final.

Desired feedback and potential changes to the draft out-year plan should focus on how well the activities meet the purpose and need and move the areas towards the desired conditions. Activities are made final after the input from the feedback period has been considered by the responsible official and any changes that are determined to improve the project's ability to meet the desired conditions are incorporated (see step 4 below).

Comment period of indeterminate duration. The FS does not have a duty to respond to comments. No way to hold the agency accountable.

All meetings will be documented by a Forest Service representative by recording discussion points and decisions in meeting notes and placed in the implementation record.

Step 2) Check against EA and the DN

The EA must be checked to verify that the proposed activities are within the range of activities analyzed under the Selected Alternative. The DN documents the decision rationale for the Selected Alternative and includes any constraints for activities.

The proposed activity will be added to the implementation checklist (Step 5) that contains the parameters of the Selected Alternative on what may be implemented per activity (acres, volume, road miles, etc.). This form will be used to track how much has been implemented to date and to verify that the limits are within the Selected Alternative.

Step 3) Check against activity cards

The activity cards describe the activities analyzed in the EA without regard to specific locations. Information about each activity includes what it accomplishes, how it is implemented, what constraints and resource-specific guidelines apply, and when it would be implemented. Resource concerns are often mitigated by design elements, which are presented in the activity cards, as well as consistency with the LMP and Best Management Practices (BMP's). Resource concerns identified post-decision due to treatment location or changed conditions will be addressed through mitigations, see mitigation discussion in Step 5.

The Forest Service will document the activity card(s) that will be used for implementing the proposed activities recommended by the responsible official following the workshop and feedback period. This documentation will include a summary of each treatment area and how the proposed activities meet the constraints outlined in the activity cards. This documentation will be placed in the implementation record. A proposed activity must adhere to the activity cards in order to stay within the effects analyzed in the South Otter EA analysis. If all the components are not met, then the activity would not be considered or would be deferred until the next public workshop for design modifications.

Step 4) Obtain Line Officer approval and place in Out-year Plan

The South Otter Project Out-year Plan will provide participants the opportunity to stay informed of activity implementation, priority listing, and on-the-ground activity design. The Out-year Plan will identify activities within a 3 to 5-year timeframe that will include the current status of already planned/in-process activities, new proposed activities, maps, follow-up treatments, and will identify timeframes for field surveys listed in the activity specific resource requirements and implementation checklist.

The updated Out-year Plan will be made available on the project website after a workshop to initiate a 30-day feedback period on proposed activities. A public notice will be published in the local and/or regional newspapers and a press release will be sent out to notify the public that the Out-year Plan is available for review and feedback. The feedback period gives an opportunity for members of the public who may not be

able to attend the workshops to provide their input on what, where and when activities are to be implemented before the activities are made final.

The responsible official reviews the proposal for an activity including a determination that the activity will meet all requirements under the DN, LMP, and other applicable laws and regulations. Activities are made final after public input has been considered and any needed changes are incorporated. The Line Officer with the delegated authority (as outlined in Forest Service Handbook and Forest Service Manual) retains the authority to make final decisions related to location, extent, and types of activities planned and completed, consistent with the DN.

Step 5) Conduct fieldwork and consultations

Forest Service personnel will conduct background research, field surveys and GIS analysis of proposed implementation areas to confirm that activities can be implemented consistent with the DN and in conformance with other applicable laws, regulations and policies. **Surveys confirm location specific conditions and determine if and how the activity can be implemented.** Fieldwork and consultation results may refine activity design elements, identify the need for additional mitigation measures, and/or result in a modification of the activity location or timing.

We survey areas after the decision. And after public input.

In addition to meeting the requirements of the National Environmental Policy Act, several other laws and regulatory requirements must be met prior to project implementation. This includes consultation and compliance as required under the Clean Air Act, Clean Water Act, Endangered Species Act (ESA), National Forest Management Act (NFMA) and the National Historic Preservation Act (NHPA). Resource concerns under some of these laws (i.e. Fisheries, Wildlife, Botany, and Heritage) are location specific and may require additional mitigations prior to ground disturbing activities. For these resources, implementers will be required to stay informed of the location-specific design criteria and mitigation measures that will be utilized after consulting with all interested parties and required agencies.

All non-sensitive field notes, spatial data, and formal consultation documentation will be placed in the implementation record.

Instructions: It is the responsibility of the resource specialists to ensure that a) the necessary compliance and consultation actions have been completed, b) that compliance and/or consultation record is placed the project implementation record, and c) certify that the necessary compliance and consultation is complete for the specified implementation area. For many resources, additional surveys may be required prior to certifying completion of necessary compliance and consultation. In some instances, existing data can be used to allow for implementation.

Survey data will be used to refine treatment layout, to identify need for mitigations, to identify areas that should be avoided or seek to minimize effects (e.g. cultural sites, sensitive wildlife areas, etc.), and to establish treatment-specific objectives and desired outcomes. Information derived from the surveys may also precipitate monitoring questions that should be considered by the interdisciplinary team or resource specialist.

Site-specific data gathering after the decision.

Fire/Fuel Surveys

- ☐ Plan units, GIS map, and conduct field surveys/stand walkthrough to determine the existing vegetation and fuel conditions and identify range of potential treatment activities necessary to move the area/unit towards the desired conditions.
- ☐ Coordinate with the Silviculturist to plan and prescribe the complete range of treatments that will meet the desired future conditions. Specifically, treatments that reduce fuels (surface, ladder, crown), moderate fire behavior and return fire to the landscape.
- ☐ Within areas/units proposed for a prescribed fire treatment, conduct necessary field surveys to gather the information required to prepare a site-specific prescribed fire burn plan that meets the desired future conditions. Identify any pre-burn preparation activities that may be required.
- ☐ All units planned for prescribed fire within the upcoming year (pile or underburn) will be entered into the Montana/Idaho Airshed Group database prior to August 31st. <https://mi.airshedgroup.org/>. Required information consists of Latitude/Longitude, Location Description, Airshed, Unit Size, Elevation, Burn Category & Type, and Fuel Loading.
- ☐ Obtain current year, USDA Forest Service major open burning permit from the Montana Department of Environmental Quality. Approval for ignitions will be determined by the Montana/Idaho Airshed Group in coordination with Montana DEQ based on dispersion forecasts and potential impacts.
- ☐ Other surveys (specify): If UAS or aerial ignition by helicopter is planned for a prescribed burn unit, a Mission Aviation Safety Plan must be completed prior to ignition (see Forest Aviation Plan).

Supporting Documentation	Date	Project File Doc Number

Name, Title (print and sign)

Date

Fisheries Surveys

Fisheries staff will complete all surveys required by law, regulation or policy within the implementation area. The list below is not exhaustive, nor does it apply to every treatment. The fisheries biologist will determine which surveys need to be conducted. While completing ground reconnaissance, look for opportunities to achieve multiple resource management objectives.

- ☐ Riparian Management Zone (RMZ) and Streamside Management Zone (SMZ) boundaries are correctly delineated, flagged, and avoided (this will be done in coordination with the project Hydrologist).
- ☐ Roadside erosion control structures (e.g. straw bale check dams / filter fabric fencing) are correctly located and installed as specified in the project design features.
- ☐ Applicable State (State of Montana 124 permit) and Federal (U.S. Army Corps of Engineers 404 permit) permits are obtained for activities affecting culverts and stream channels.
- ☐ Hazard trees within RMZs that are proposed for felling and retention on site are identified, field checked, and flagged.
- ☐ Other surveys (specify):

Supporting Documentation	Date	Project File Doc Number

Standard inclusions above (if documentation is attached) or in this space (if only a few lines need to be written about it) could include: confirmation that the activity fits within the range of effects analyzed in the EA and why; if adjustments or mitigations were applied to the original proposal due to this resource; surveys or other form of data collection (or reasoning why not needed); contacts made with the public pertaining to this resource for this activity; compliance with laws and regulations; Biological Assessment, Biological Evaluations, and other records of T&E species; consultation with State and Federal Agencies; U.S. Army Corps of Engineers or Montana Fish, Wildlife and Parks permits; peak flow calculations; if the activity is within a flood plain, municipal watershed, or principal drinking water source; if it requires placement of fill in stream beds, bridge/culvert construction/replacement in stream beds, cutting of trees near streams, or diverting or pumping water; if it requires discharge of waste water; if the Watershed Condition Classification Framework score for affected watersheds would change; if any timing restrictions are required; and any other required documentation.

Name, Title (print and sign)

Date

Heritage

Under the National Historic Preservation Act (NHPA), consultation with all interested parties is required prior to implementation. This includes Indian Tribes and Tribal Government, the applicable State Historic Preservation Officer, a Tribal Historic Preservation Officer, and interested members of the public. Implementation activities will seek to minimize or avoid adverse effects to historic properties wherever possible. Some activities may have little or no potential to adversely affect historic properties and may proceed after the heritage program manager has reviewed the proposed activity and the responsible line officer approves.

If the proposed activity causes the Heritage Program Manager to reach a finding of adverse effect to historic properties, a separate agreement document (Memorandum of Agreement or Programmatic Agreement) will be required as outlined under 36 CFR 800. That document will outline mitigations to be completed by the agency and those mitigations will be completed no later than five years after completion of the implementation area's activities.

Provisions under the U.S. Forest Service Region One Programmatic Agreement outline the process to be followed if newly discovered heritage resources are encountered during implementation. Referred to as "post-review discoveries" under NHPA and "inadvertent discoveries" under the Native American Graves and Repatriation Act (NAGPRA). Those same procedures will apply to this project. Activities located within 50 meters of a newly discovered heritage resource will cease until a heritage resource specialist completes the review process.

Consultation required under the NHPA will be completed prior to conducting any activity within the implementation area. The heritage program specialist will utilize all applicable, existing Programmatic Agreements during the consultation process. Consultation may require the heritage program specialist to conduct background literature research, field inventory (or survey), or oral history interviews to meet the "good faith effort" requirement to identify historic properties within the implementation area. If historic properties are identified within the Area of Potential Effect (APE), mitigation measures may result in modification of treatment unit boundaries, activity timing, or intensity of activity type.

- ☐ Consultation with the Montana SHPO was completed through measures outlined in the South Otter Programmatic Agreement...
- ☐ Consultation with the Idaho or Montana SHPO was completed through measures outlined in the National Historic Preservation Act Phasing Programmatic Agreement.
- ☐ Consultation has been completed with all Tribes who have expressed an interest in historic properties within the project APE.
- ☐ Any changes to the scale, nature or extent of proposed activities will be provided to the Heritage Program Manager for review prior to implementation and may require re-initiation of the consultation process.
- ☐ All mitigation measures (if necessary) identified in a MOA/PA will be completed within five years of completion of activities within the implementation area.

Supporting Documentation	Date	Project File Doc Number

The above list provides supporting documentation that the agency has met its Section 106 responsibilities under the NHPA prior to implementation. Documents included could include inventory reports or other project review documentation; efforts to obtain public input and comments on heritage resources; SHPO consultation documentation (letters, emails, etc.); Tribal government consultation documentation (letters, emails, etc); and any agreement documents (Memoranda of Agreement or Programmatic Agreements) that were completed in order to mitigate adverse effects to historic properties. Sensitive information, including site location information may be withheld from the public record in order to protect historic properties, as allowed under federal law.

Name, Title (print and sign)

Date

Hydrology

- ☐ All Riparian Management Zone (RMZ) and Streamside Management Zone (SMZ) boundaries are correctly delineated, flagged, and avoided (this will be done in coordination with the project Aquatic Biologist).
- ☐ Required project design features and BMPs are correctly located and installed as specified in the project design features in order to ensure that impacts to streams, riparian areas, wetlands, floodplains, and springs would be non-existent or negligible, and that effects would be limited to minor, short-term, localized disturbance in the unlikely event that a temporary road needs to be routed through a wetland area.
- ☐ Identify locations where the post-project cumulative ECA is greater than 18%, proposals are at high (Red) risk of raising ECA above the 20% threshold, increases in water yield are likely to be measurable, and depending on the dominant substrate size could lead to added channel instability.
- ☐ Review new specified road design for avoidance or minimization of construction in RMZs.
- ☐ Review proposed road construction plans and tracked line machine trails to minimize new stream crossings. Where stream crossings (on fish bearing or non-fish bearing streams) are unavoidable, crossing locations are field verified by fish biologist or hydrologist prior to construction.
- ☐ For road decommissioning or storage proposals that involve removal of culverts or other work in the stream channel, necessary permits are obtained.
- ☐ Review road maintenance activities in RMZs
- ☐ Other surveys (specify):

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Name, Title (print and sign)

Date

Invasive Plant Surveys

Based on survey of invasive weeds in the treatment area, prioritize weed infestations for treatment in high-risk sites, including treatment operating areas and along access routes. Control weeds as necessary prior to treatment implementation. Modify treatment as needed to reduce expansion of invasive weeds.

- ☐ Pre-treatment invasive plant species surveys: Within high-risk areas for invasive plant species, complete inventories to identify invasive plant populations. Treat haul routes and populations of Priority 1A, 1B and 2A invaders.
- ☐ Avoid populations of Priority 1A, 1B or 2A weeds.

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Name, Title (print and sign)

Date

Land Survey

Prior to commencing any ground- or vegetation-disturbing activities, evidence of the PLSS (Public Land Survey System) will be marked for protection. The Forest Land Surveyor shall be consulted to assist with providing data, searching for and evaluating evidence, and locating and protecting monuments of the PLSS from destruction.

- ☐ Forest Engineer contacted and survey has been completed.
- ☐ If proposed treatment is within 300 feet of wilderness, locate boundaries.
- ☐ Other surveys (specify):

Supporting Documentation	Date	Project File Doc Number

Name, Title (print and sign)

Date

Recreation

The Recreation Specialist will work with the team and the proposed treatments to inventory the recreation attributes that may be affected by treatments. The type of treatment and the location can affect recreation activities and the quality of the recreation experience in the near term and over the long term. Evaluate how the treatment will affect the recreation facilities and settings in the area. Use the design features to ensure that the recreation opportunities are managed appropriately for the period of treatment implementation and for the long-term. Design implementation to minimize the impact on recreation users to the extent feasible, including having good communication with partners and the public about the impacts of the activities.

Developed Recreation Sites

- ☐ Identify priority developed recreation sites for treatment (including hazard tree removal) and any other developed sites affected by treatment activities.

Dispersed Recreation Sites

- ☐ Identify dispersed recreation sites that need to be treated or those that need to have a higher degree of clean-up than other general forest areas.

Trails

- ☐ Identify the location of any National Forest System Trail (NFST) to be impacted by treatment activities.

Recreation Rental Facilities

- ☐ Identify recreation rental facilities and the reservation season that might be impacted by treatment activities
- ☐ Identify designated National Scenic, Historic or Recreation Trails including existing routes and areas where potential re-routes may be implemented.
- ☐ Identify managed snow trails.

Recreation Special Uses

- ☐ Identify the location of any authorized recreation special uses that would be impacted by treatment activities. Identify the types of uses that would be affected.

Unique Special Areas

- ☐ Identify the location of any unique area within the treatment area, such as disabled hunting areas, rock collecting areas, etc.

Partnerships/Volunteers

- ☐ Identify any scheduled project work by partners or volunteer groups in areas that may be impacted by treatment activities.

Public Health and Safety

- ☐ Identify any closures that may need to be in place for the safety of the public.

☐ Other surveys (specify):

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Name, Title (print and sign)

Date

Scenic Resource Surveys

Evaluate and select the applicable design features for visual resources such that the treatment area's identified visual quality objectives are achieved consistent with the LMP.

- ☐ Identify valued scenic resources
- ☐ Identify sensitivity level of scenery
- ☐ Identify treatment area's visual quality objectives, per LMP guidance in accordance.
- ☐ Other surveys (specify):

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Name, Title (print and sign)

Date

Sensitive Plant Surveys

Surveys will be conducted following laws, regulations, and policies for rare plant species (refer to the NEPA document and the Biological Evaluation for a list of all of the laws, regulations and policies).

The Forest Botanist will determine which areas will be surveyed following the Region One Botany Survey and Analysis Protocol.

<i>Habitat Type</i>	<i>Species Potentially Present</i>

- ☐ A Pre-field review will be used to determine if surveys are required based on the type and intensity of proposed management actions, and whether at-risk plants are known to occur in the analysis area or are suspected to occur based on the presence of suitable habitat. If the pre-field review determines direct or indirect effects from proposed activities are possible, and plants are known or suspected to occur, conduct a risk analysis and plan field surveys where needed.
- ☐ If a rare plant or a forest species of interest is found, the area could be flagged and avoided (buffered) based on the current condition, the proposed implementation treatment, and the species of plant.
- ☐ If a buffer is placed around a plant species, the buffer will be documented, mapped, and sent to the proper individuals in order to notify them of the existence of the buffered locations.
- ☐ Other surveys (specify):

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Name, Title (print and sign)

Date

Silviculture Surveys

The stand diagnosis, exams and insect and disease surveys will be used to determine the existing conditions within each proposed treatment area and cross the project area. Existing conditions shall be compared to the desired condition to determine the departure from desired conditions and to develop a range of treatment options. Once a treatment alternative has been chosen, silvicultural prescriptions will be prepared, reviewed and signed by a certified Silviculturist. For example, an area proposed for timber harvest may at the time of implementation become a non-commercial treatment or prescribed burning only. This will be determined ahead of timber sale contract preparation.

- ☐ Conduct stand diagnosis for each proposed treatment unit. (This may include R1 Common Stand Exam or R1 Walk-through Exam)
- ☐ Conduct insect and disease survey. (This may include Aerial Detection Survey, Forest Health and Protection site visit, and/or Stand Diagnosis)
- ☐ Conduct old growth exams where appropriate to meet LMP Desired Conditions. (This may include R1 Common Stand Exam, R1 Walk-through Exams, and/ or old growth specific criterion)
- ☐ Prepare a Silvicultural prescription and marking guides for all vegetation management activities. Prescription must be reviewed and signed by a certified Silviculturist. (Completed for all treatment units within the chosen alternative)
- ☐ Areas proposed for openings or tree planting will be monitored to ensure adequate stocking by year 5 of implementation. Minimum stocking standards can fluctuate by productivity class and will be determined by the silviculturist.

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Name, Title (print and sign)

Date

Soil Surveys

- ☐ Sensitive soil types, i.e. severe erosion hazard rating, slopes greater than 40 percent, landslide prone areas identified and avoided.
- ☐ Treatment areas overlaid with Soil Risk Evaluation Framework map products located in the project record. Field reconnaissance will occur at varying levels as outlined below based on the mapped soil risk category within the treatment area boundaries.

Soil Risk Category (SRC)	Pre-Implementation Practices
A, B	<p>Actions: Proposed project activities are subject to the standard range of design features contained in Appendix B.</p> <p>*Pre-project DSD or CWD soil surveys in units are only needed if the layout crew or other resource special survey identifies:</p> <ul style="list-style-type: none"> • past disturbance (<u>such as excavated skid trails, tree stumps or persistent fire consumed CWD, high severity fire effects</u>) covers greater than 15% of the unit; • and/or recent (< 10 years) high severity fire covers greater than 15% of the unit; and/or • lack of CWD.
C, D	<p>Actions: Soil inventory of persisting detrimental soil disturbance <u>may be required</u> within these project areas. Proposed project activities are subject to the standard range of design features contained in Appendix B. Should persisting DSD from past management activities be found during field reconnaissance, proposed project activities may need to be modified to avoid adverse soil resource effects.</p> <p>Pre-project DSD and CWD soil surveys are needed once unit boundaries are established if the following proposed treatments/conditions are met:</p> <ul style="list-style-type: none"> • ground-based yarding is proposed on slopes < 40%; or • mechanized clipping is proposed on slopes >40%; and/or • temporary road construction. <p>Combined with:</p> <ul style="list-style-type: none"> • past vegetation management that has occurred within the last 35 years; and/or • recent (< 10 years) high severity fire covers greater than 15% of the unit; • and/or lack of CWD. <p>* <u>If the layout crew or other resource specialist survey does not identify lack of CWD and/or evidence of past management (such as excavated skid trails, tree stumps or persistent fire consumed CWD, high severity fire effects), no soil inventory in units is needed.</u></p>

Soil Risk Category (SRC)	Pre-Implementation Practices
E, F	<p>Actions: Soil inventory of persisting detrimental soil disturbance <u>will</u> be required within these project areas. Avoidance of commercial harvest or prescribed burning in these areas may also be considered as well as exploration of potential restoration opportunities. Design features in addition to the standard range of design features contained in Appendix B may be warranted.</p> <p>Pre-project DSD and CWD soil surveys are needed once unit boundaries are established if the following treatments are proposed:</p> <ul style="list-style-type: none"> • ground-based yarding on slopes < 40%; or • mechanized clipping on slopes >40% is proposed; or • unit-wide prescribed fire operations; and/or • temporary road construction. <p>Should pre-project soil inventory identify units approaching 15% DSD and/or CWD limitations, soil mitigations and/or a soil restoration plan will be developed and implemented with proposed vegetation/fuels treatments to ensure long-term soil productivity is maintained.</p>

*Timber layout crew and other resource specialist surveys will provide valuable insight to general unit conditions and help guide the need for soil inventory of disturbance and CWD surveys in these Soil Risk Categories.

- ☐ Prior to burning, prescribe fire prescriptions will be designed to meet these soil protection requirements below:
- If ground cover is less than 70 percent, further consumption and loss of ground cover should not exceed 15 percent. Ground cover includes duff, organic soil horizons, basal area of vegetation, fine woody material, coarse woody material, and surface coarse fragments.
 - Upon completion of commercial harvest and prescribed fire activities, the levels of coarse woody material (greater than 3 inches diameter) have been established (Table 1 Coarse Woody Debris requirements by Fire Group). This material encompasses both standing dead as well as down woody fuels.

Table 1. Coarse Woody Debris requirements by Fire Group

Fire Group	Coarse Woody Debris (CWD) (Tons/acre)
Warm, Dry Ponderosa Pine and Douglas-fir (FG-2 & 4)	5-10
Cool, Dry or Moist Douglas-fir (FG-5, 6)	10-20
Cool Sites Usually Dominated by Lodgepole Pine (FG-7) Dry, Lower Subalpine (FG-7) Moist, Lower Subalpine (FG-9)	8-24

☐ Other surveys (specify):

Supporting Documentation	Date	Project File Doc Number

Standard inclusions above (if documentation is attached) or in this space (if only a few lines need to be written about it) could include: confirmation that the activity fits within the range of effects analyzed in the EA and why; if adjustments or mitigations were applied to the original proposal due to this resource; surveys or other form of data collection (or reasoning why not needed); contacts made with the public pertaining to this resource for this activity; compliance with laws and regulations; if there are steep slopes, highly erosive soils, landslides, wetlands, or alluvial fans located in the project area; and any other required documentation.

Name, Title (print and sign)

Date

Timber Surveys

- ☐ Coordinate with specialists to modify cutting unit boundaries.
- ☐ Complete Residual Value appraisal.

Supporting Documentation	Date	Project File Doc Number

Standard inclusions above (if documentation is attached) or in this space (if only a few lines need to be written about it) could include: confirmation that the activity fits within the range of effects analyzed in the EA and why; if adjustments or mitigations were applied to the original proposal due to this resource; surveys or other form of data collection (reasoning why not needed); contacts made with the public pertaining to this resource for this activity; compliance with laws and regulations; documentation associated with completion of Gates 1, 2, and 3 if applicable; economics analyses, marking guidelines, cruising data, and layout information; recording of stands designated for small sale strategy if applicable; and any other required documentation.

Name, Title (print and sign)

Date

Transportation Planning Surveys

Apply the appropriate design features for transportation systems and haul routes in order to keep effects to existing routes and effects from new routes within the bounds disclosed within the EA that supports the Decision Notice for this project.

- ☐ Existing road to be used in the sale – Road log
- ☐ New specified road construction – flag-line with survey
- ☐ Final Road Design
- ☐ Construction staking of new specified road.

Supporting Documentation	Date	Project File Doc Number

Standard inclusions above (if documentation is attached) or in this space (if only a few lines need to be written about it) could include: confirmation that the activity fits within the range of effects analyzed in the EA and why; if adjustments or mitigations were applied to the original proposal due to this resource; surveys or other form of data collection (reasoning why not needed); contacts made with the public pertaining to this resource for this activity; compliance with laws and regulations; Travel Analysis or Access & Travel Management documentation; road activity information associated with the activity; if roads will be added to or removed from the Forest Transportation System; if revisions will be needed for the Motor Vehicle Use Maps; easement or surfacing agreements; applicable Schedule A maintenance agreements, and any other required documentation. Document road storage and decommissioning requirements in compliance with immediate needs for storage or decommissioning.

Name, Title (print and sign)

Date

Wildlife Surveys

Wildlife consultations with the United States Fish and Wildlife Service under Section 7 of the Endangered Species Act will be completed prior to signing the DN. After that, if any future activities are proposed for implementation that were not covered in the original Letter of Concurrence or Biological Opinion, then Section 7 consultation will have to be re-initiated and completed before those activities can occur. The wildlife biologist will determine which surveys need to be conducted.

- ☐ Field verification surveys documenting presence of known American peregrine falcon and bald eagle nest sites.
- ☐ Flammulated owl surveys for mapped owl habitat or known nest sites.
- ☐ Field verification assessment surveys of mapped Fisher and Pine Marten habitat.
- ☐ If needed, coordinate with Montana FWP to identify areas important to various wildlife species (elk calving areas, security areas, etc.) for avoidance and/or application of special management considerations. Typically, special management considerations would be in the form of design features.
- ☐ Document nest sites for raptors and primary and secondary cavity nesters, if needed.
- ☐ Conduct photo-point monitoring of prescribed burn areas by establishing pre-treatment photo points, and repeating the photos post-treatment, if partnership project funding is used.
- ☐ Other surveys (specify):

Supporting Documentation	Date	Project File Doc Number

Standard inclusions above (if documentation is attached) or in this space (if only a few lines need to be written about it) could include: confirmation that the activity fits within the range of effects analyzed in the EA and why; if adjustments or mitigations were applied to the original proposal due to this resource; surveys or other form of data collection (or reasoning why not needed); contacts made with the public pertaining to this resource for this activity; compliance with laws and regulations; Biological Assessment, Biological Evaluations, and other records of T&E/Rare/Sensitive species; consultation with State and Federal Agencies; if there are any timing restrictions for the activity; and any other required documentation.

Name, Title (print and sign)

Date

Instructions for the Activity Implementation Checklist

An implementation checklist packet will be prepared using templates on the following pages. These templates are activity checklists that would be used to verify that all implementation process steps have been followed and documented. The instructions below refer to this template.

1. Ensure Steps 1 through 5 of the Implementation Process up to this point have been completed.
2. Keep the implementation record current with all documentation related to implementation. Include a record number in all file names for indexing and long-term record keeping and include the record number on the following pages to show all pertinent files are a part of that record and can be easily obtained.
3. “Activity Information” page: This section is general activity information. For relatively simple activities, all information may be presented here, including map images. For more complex activities, include summary or general information and reference detailed activity information, such as maps, activity cards, or other relevant documents.
4. “Process Checklist” page: This section should document all the steps leading up to implementation of the activity and show that the Forest Service has followed the process within this implementation plan. Example: process-related records are listed in the template, but the list for any given activity should include all records disclosing the Forest Service’s process leading up to implementation.
5. The remainder of the template pages are dedicated to resource documentation and rationale for approval of the activities. All documentation referred to should be a part of the implementation record. If separate documentation is not necessary due to the scale or complexity, the space on that template page may be used to disclose any necessary information.

Project:		District:	
Contact Person and Title:			
Legal Description or Location:			
Project File Location:			
List all maps and general activity documents	Date	Project File Doc Name	

Available Treatment Acres from Proposed Action					
Prescribed Burning:	184, 150	Commercial Thinning Treatments:	21, 812	Pre-Commercial Thinning:	15, 700
Project Treatment Acres					
Regeneration Treatments: *	907	Improvement Treatments:	4, 534	Reforestation (tree planting):	39, 939
Treatment Type:	Treatment Acres:	Treatment Type:	Treatment Acres:	Treatment Type:	Treatment Acres:

*Groups of small openings may be created within the Improvement Units. Openings shall not exceed 5 acres in size and 20 percent of the unit area. Regeneration includes; shelterwood, seed tree and group selection where most appropriate.

Specified Road Work (Type)	Miles	Temp Road Mileage Available	Project Temp Road Mileage

This section is general activity information. For relatively simple activities, all information may be presented here, including map images. For more complex activities, the summary for the activity or general information and referenced detailed activity information, such as maps, activity cards, or other relevant or required documents would be presented here.

Decision Implementation Tracking Form

This form will be used to track actions for which there are limits specified in the Decision Notice. Limits may be for the amount of an activity that can occur, either in total, within a timeframe (such as annually), or if there is a maximum within a geographical area. The limit may also be related to an effect caused by implementation, if it requires tracking from one activity to the next to ensure that limit is not exceeded in the life of the Mud Creek Project.

Activity and Maximum Allowable		Regeneration Harvest	Precommercial Thinning	Prescribed Fire	Temp Road Construction	New NFS Road Construction
Activity Name	Year	Acres	Acres	Acres	Mile	Miles
Total Remaining:						

Area-specific Limitations (units, sites, drainage, etc)	Type of Limitation (avoidance, timing, duration, etc)	Applicable Activities

Note that all pertinent activities or trackable measures within the Selected Alternative will be added to the form to be tracked throughout the life of the project.

Mitigation Measures

The following mitigation measures identified for the South Otter project are informed by pre-implementation surveys and consultation. The interdisciplinary team was made aware of the proposed mitigations and they were reviewed by the different resource specialists to ensure that mitigations for one resource did not create unintentional impacts to another resource, as well as to ensure the proposed mitigation was feasible (see table below). If specialists did not find that application of the mitigation changed the anticipated effects for their resource, no further documentation was needed. If the mitigation would change anticipated effects, it is stated below what that difference is and why.

The Responsible Official has reviewed and approved the mitigations, along with any associated monitoring needs as described. These mitigations will be included as part of implementation of the proposed action.

In addition to listing the Mitigation Measure, the table below also specifies what issue/concern or cause of effects the measure responds to, anticipated effectiveness of the mitigation, and where the mitigation is applicable (by unit, sale area, habitat/resource condition etc.).

Mitigation measures are identified when it is evident that proposed actions will have unintended or greater effects than anticipated to the applicable resource – or because the analysis indicates a particular standard/guideline or law/regulation will not be met. When proposing mitigations, **specialists should indicate whether the mitigation is necessary to reach a “Finding of No Significant Impact” (EA) determination or is necessary for land management plan/law/regulation compliance.** Mitigation measures differ from design features in that they are identified during or post-effects analysis (reactive), while design features are identified prior to effects analysis (proactive). However, they can both serve the purposes of ensuring law/regulation/policy compliance, reducing/eliminating effects or responding to issues/concerns and both are approved by the Line Officer.

The **Responds To** column should describe the law/regulation or land management plan standard or guideline, the issue/concern or level of effects that are prompting the need for the mitigation. This will help the responsible official and interdisciplinary team members better understand the need and how it might be accommodated.

Anticipated Effectiveness describes how successful the mitigation measure should be in preventing or lessening effects to the applicable resource, habitat component or feature/condition of concern. This effectiveness should be evaluated with monitoring post-implementation but should be supported by professional experience or best available science when being proposed.

The **Applicable Area/Activity** column specifies where the mitigation measure needs to be applied within the project area. Because mitigation measures are responding to more focused issues/concerns or effects, they are typically less applicable to the entire project and more applicable to certain areas or units, features or conditions, or types of activities being implemented.

Table 2. Mitigation Measures & Associated Monitoring by Resource Area

Mitigation Measure	Responds To (Issue/Concern, Cause of Effects)	Anticipated Effectiveness	Applicable Area/Activity
Botany			
Heritage Resources			
Fire & Fuels			
Invasive Plants			
Transportation			
Recreation & Scenic Resources			
Soil, Water & Fisheries			
Vegetation Management			
Wildlife			

Table 3.: Mitigation Measure Review by Resource Specialists

Mitigation Measure	Determination	Further Explanation (if needed)
Botany		
Heritage Resources		
Fire & Fuels		
Invasive Plants		
Transportation		
Recreation & Scenic Resources		
Soil, Water & Fisheries		
Vegetation Management		
Wildlife		

The mitigation measures and associated monitoring in the above table have been approved by the Line Officer/Responsible Official and took into consideration impacts of the mitigations on other resource areas, as described by pertinent resource specialists.

District Ranger approval to proceed to Step 6

The District Ranger must verify that all resource specialists have completed the compliance and consultation actions required and have signed their respective checklist. By signing below, the District Ranger is confirming all necessary steps have been completed and project implementation may proceed to Step 6.

Signature

Date

District Ranger
Ashland Ranger District
Custer Gallatin National Forest

Step 6) Line Officer approval to implement

The Line Officer reviews the checklists (and associated documents) from Step 5 above to determine that the activity has met all requirements under the DN, LMP, Forest Service Handbook and Manual. Once a Line Officer has determined that the activity has met all requirements they will approve and sign the checklist. The signed checklist will be placed in the implementation record. Final unit boundaries will be marked. For commercial sales, units will be cruised prior to advertisement.

Step 7) Prepare contracts and other implementation documents, as needed

Forest Service resource specialists will review or prepare all contract documents prior to bids being solicited to implement the activity. This will include the contract, agreements, burn plans, activity cards, activity maps, bid packages or other implementation instruments as required. See the Activity-specific Resource Requirements section for appropriate measures and provisions that will be incorporated to ensure that effects are as planned. All required associated documentation will be placed in the implementation record.

Step 8) Implement the activity, document implementation, and associated monitoring, etc.

The implementation record will include any inspection reports, photographs of the implementation, photographs of the completed activity, and so on. It is especially important to document the effectiveness of mitigations that were developed under Step 5. The LMP will be followed for any necessary monitoring, and results will be included in the implementation record. Documentation during this step is especially critical for informing the next phase of implementation, or the next project, where changes to activity cards or design features are needed to address effectiveness in minimizing or avoiding resource impacts.

Step 9) Monitoring

Project monitoring will take place during and following implementation and will serve three purposes: 1) to ensure compliance with project design elements listed in the Activity Cards, 2) to inform the adaptive management process when changes need to be made to design elements or mitigations to achieve intended protections, and 3) to inform design element development for future projects and provide support for element effectiveness. Resource-specific monitoring requirements listed within this section are meant to be specific to the South Otter project and will be complimentary to any LMP monitoring requirements and the Custer Gallatin National Forest's Implementation and Effectiveness Monitoring Protocol. Resource specialists will document their monitoring results in a summary format that can be included as part of the project record.

Instructions: This section describes treatment-specific monitoring that may be needed. This monitoring is in addition to the annual reviews described in Appendix D of the LMP. Those already listed are considered mandatory. Any additional monitoring is at the discretion of the Line Officer.

Fisheries

- A. Riparian Management Zone (RMZ) and Streamside Management Zone (SMZ) boundaries will be walked following the completion of implementation to measure and document compliance and effectiveness of the design features.
- B. Haul roads will be periodically monitored during the active haul period to measure and document compliance and effectiveness of the design features. Winter haul roads will be more closely monitored than summer haul roads, particularly during rain-on-snow events or during spring break-up.
- C. Erosion control sediment trap structures will be monitored during and after hauling operations are

completed to measure and document their effectiveness.

- D. Road maintenance activities (e.g. snow plowing, grading, dust abatement) will be monitored to document compliance with the 2015 Road-Related Activities Biological Opinion.

Heritage Resources

- A. All Historic Properties located within the implementation area's APE will be monitored within five years of completion of the implementation plan's activities.

Air Quality Specified monitoring:

- A. During prescribed fire implementation, monitor smoke dispersion and impacts to populated areas, the Class 1 Airshed of the Northern Cheyenne Reservation, or sensitive receptors such as Birney and Broadus, MT to ensure compliance with requirements of the USDA Forest Service major open burning permit issued by the Montana Department of Environmental Quality.

Fire and Fuels

- A. As needed, pre/post treatment monitoring may be conducted to document existing and post treatment conditions. Data may be used to determine if desired future conditions have been met, identify additional treatment needs or to refine/modify future treatments.
- B. During activities implemented with stand improvement or fuels reduction service contracts, quality control (contractor) and quality assurance (government) will be conducted to ensure prescriptions and activity specifications are met.
- C. During prescribed fire implementation, monitoring of onsite weather (current/forecast), fire behavior, fuel moistures and smoke dispersion will be conducted and documented.
- D. All wildfires which start in or burn into a fuel treatment that has been completed within the last ten years must have a fuel treatment effectiveness assessment conducted and results entered into the Fuel Treatment Effectiveness Monitoring (FTEM) database. All fuel treatment effectiveness assessments must be entered into the FTEM database within 90 days of control of the fire.
- E. Post-treatment: monitor changes to vegetation and fuel conditions within completed units to determine when to reapply prescribed fire in order to maintain desired conditions and treatment effectiveness.

Invasive Plants

- A. Post-treatment invasive plant species:
- B. Inspect and document all limited term ground-disturbing operations in infested areas following completion of the treatment.
- C. For ongoing treatments, continue to monitor until reasonable certainty is obtained that no new infestations have occurred. Provide for follow-up treatments based on inspection results.

Soil

- A. Timber sale and prescribed burn units will be surveyed post project in accordance with the soil post implementation monitoring table below.
- B. Soil Monitoring Plan

Table 4. Soil Monitoring Plan

Soil Risk Category (SRC)	Post-Implementation Monitoring
A, B, C, D	*No post-project DSD or CWD soil surveys are needed in these areas unless wanted for long-term LMP Monitoring or SREF model calibration.
E, F	*Post-project DSD and/or CWD effectiveness monitoring is needed in at least a <u>26**</u> <u>representative units (random sampling rule)</u> subset of all ground-based harvest and burn units that overlay these SRC areas within the project area.

** see below

** In terms of sample size needed (assuming a normal distribution).

If we want to know within 10% with 90% confidence what the post project %DSD in categories E and F in the project area is and we believe that 80% of the units in these categories will show elevated DSD (approaching or above 15%) we need to have at least **26** samples from categories E and F.

$$n = (z^2 \times p(1-p)) / m^2$$

n = required sample size

z = confidence level at 90% (critical value of 1.282) 1.282

p = estimated prevalence (population proportion) of measure (decimal percent) 0.8

m = Margin of error at 10% (standard value of 0.10) 0.1

N = 26

Water

- A. Monitor application of BMP's on roads to ensure completed as planned and effective.
- B. Review construction of roads in RMZ to ensure no side casting of material.
- C. Review road maintenance to document compliance with all project design features.
- D. Where culverts on live streams were removed review channel conditions one year following removal to determine effectiveness, vegetation recovery or need for additional seeding, and potential for adaptive management on similar projects in the future. Continue to monitor at stream crossings to validate sufficient vegetation recovery. Report findings in bi-annual LMP monitoring report and annually in WIT.

Transportation

- A. Road work included in timber sales will be monitored during implementation of the project by the Forest's Engineering Representative (ER) with assistance from Project Inspector (PI). Field inspection forms will be utilized to document progression of the work, this information will be forwarded to the Timber Sale Contracting Officer (CO) Timber Sale Administrator (TSA), District Ranger, Forest Engineer (FE), and the Forest Service Representative (FSR).

- B. Road conditions during timber sale activities will be monitored by forest personnel on site actively working on the implementation of the project, including the ER, PI and potentially the TSA. Once again the field inspection forms will be used to document project work and road conditions during implementation of the timber sale. The forms will be forwarded to the Contracting Officer, District Ranger, Forest Engineer, Timber sale administrator, and Forest Service Representative.
- C. Monitoring of vegetation recovery on stored or decommissioned roads, will be accomplished by the BNF watershed staff. Barren areas will be reseed where necessary. Where culverts on live streams were removed review channel conditions one year following removal to determine effectiveness, vegetation recovery or need for additional seeding, and potential for adaptive management on similar projects in the future. Continue to monitor at stream crossings to validate sufficient vegetation recovery. Report findings in bi-annual LMP monitoring report and annually in WIT.
- D. Open system roads are monitored by field going personnel, as well as random deferred maintenance surveys. Issues on roads are usually documented through emails or phone messages to engineering staff. Accomplishments by force account crews are compiled on an annual basis. Deferred maintenance surveys are documented in NRM.

Silviculture

- A. Complete reforestation stocking surveys in artificial and natural regeneration treatments to determine stocking density, distribution, species composition and health of regeneration as required by National Forest Management Act (NFMA).
- B. Perform a walk-through exam to monitor the effectiveness of the treatment, ensure objectives were met and identify any follow-up treatment needs.

Rare Plants

- A. Pre and post implementation monitoring on rare plant populations to ensure that all protection measures were met.
- B. Pre and post management implementation monitoring on rare plants to document the response from the management action.
- C. Pre and post management implementation monitoring in rare plant habitat and populations for invasive plant species presence, expansion, or reduction within those areas.

Native Plant Revegetation

- A. Monitoring post implementation for native plant revegetation seeding success on treatment areas (ex: temporary roads and landings). Monitoring would be conducted using qualitative and quantitative methods following the Region One Native Plant Materials Revegetation Monitoring Guide.

Wildlife

- A. Post-completion verification of any area specifically prohibited from treatment from the Northern Rockies Lynx Management Direction (NRLMD).
- B. Documentation of any reported grizzly bear/human interactions with contractors or other project personnel during implementation.
- C. Any monitoring and reporting requirements that are specified by the U.S. Fish and Wildlife Service in their Letter of Concurrence or Biological Opinion.

Step 10) Adaptive Management

Adaptive management is system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate

management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain. If the treatment does not meet anticipated outcomes, adaptive management allows for changes to be made on what treatment to do. Adaptive management is focused on changing proposed treatments based on whether they are successful at meeting anticipated outcomes. The Council on Environmental Quality and U.S. Forest Service have recognized that adaptive management can be consistent with NEPA, see 43 CFR § 46.145 and 36 CFR § 220.7(b)(2)(iv).

Treatments are designed to meet specific objectives depending on existing and desired conditions and must take into account a variety of considerations, such as topography, site productivity, infrastructure in place, proximity to structures / private land, etc. Additionally, treatments must be carried out in a manner that meets specifications in design elements and resource constraints (as described in the Activity Cards). Implementation and post-implementation monitoring (as outlined in Step 10 above) is prescribed to document treatment activity compliance with design elements and mitigations. The conventional adaptive management cycle includes developing and evaluating the most effective treatments based on the best available science and then using the NEPA process to plan and propose those treatments. While the adaptive management cycle allows new science and learning to inform the adjustment of treatments during implementation, it focuses on monitoring and comparing post-implementation outcomes to predicted outcomes. If the outcomes are not moving resources toward desired conditions, then the treatments themselves may be altered and refined within the scope of the completed NEPA analysis.

However, if more substantial changes to the treatments are required to attain the predicted outcomes and move sufficiently toward desired conditions, the treatments may need to be altered under a subsequent NEPA analysis.

Process Checklist

Step	Document	Date	Project File Doc Number
1			
2			
3			
4			
5			
6			
7			
8			
9			

Refer to all documentation that shows the implementation process was followed. Attached documents that would be listed above could include:

- Applicable Workshop Meeting Notes;
- Out-year Plan(s);
- Comments received and summary of comments;
- Letters sent or email communications with the public;
- Government-to-government consultation documentation with local tribes (including meeting notes, letters sent, etc.);
- Notifications printed in newspaper of record; and
- Any letters or memos associated with the activity that authorizes it or that the Line Officer has signed off on.

A process summary can occur in this space if needed to explain any of the above.