



File Code: 1570
Date: October 24, 2022

Dear Objector:

This letter is in response to objections filed on the Greenhorn Environmental Assessment and Draft Decision Notice released by Dale Olson, Madison District Ranger. I have read your objections and reviewed the project record. My review of your objections was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

ADMINISTRATIVE REVIEW PROCESS

The regulations at 36 CFR 218.8 provide for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections. In my review I considered issues related to the National Environmental Policy Act, Sensitive plants, wildlife, Threatened and Endangered Species, soils, climate change, grazing, roadless areas, roads, fire and fuels, vegetation management, and invasive plants.

OBJECTION RESOLUTION MEETING

I conducted a resolution meeting on Friday, September 16, 2022, attended by the following objectors:

- Clint Nagel of Gallatin Wildlife Association
- Nancy Schultz
- Tom Partin of American Forests Resource Council
- Sean Steinbach of Sun Mountain Lumber

We discussed a number of specific issues related to the proposed action and effects analysis including bighorn sheep, wolverine, grizzly bears, wildlife habitat connectivity, climate change, drought, and vegetation management. Although we did not resolve your objections, I appreciated hearing your perspectives on these diverse topics.

RESPONSE TO OBJECTIONS

As specified at 36 CFR 218.11(b), this is my response to your objections to the Greenhorn Environmental Assessment and draft Decision Notice. I have found that the responsible official provided adequate analysis of the issues raised and provided acceptable documentation of compliance with applicable law, regulation, and policy.

As a result of my review of objections and the resolution meeting, I am instructing the Responsible Official to complete the following before signing the decision notice.

Sensitive Plants:

- Include effects analysis for two sensitive plant species, large-leaf balsamroot



(*Balsamorhiza macrophylla*) and Hall's rush (*Juncus hallii*) and correct the project record where it states that whitebark pine is the only sensitive species analyzed for the Greenhorn project.

- Make appropriate corrections to the EA and project record to reflect that whitebark pine is a proposed for Endangered Species Act listing rather than a sensitive species.

Snags and Old Growth:

- Clarify whether any snags over 15 inches diameter at breast height (DBH) will be cut and disclose the existing densities of snags greater than 15 inches DBH.
- Clarify the existing condition of old growth types within the project area and how Forest Plan Forest-wide Vegetation Standard 1 is being met (Green et. al. definition for old growth in Eastern Montana).
- Disclose whether treatments will occur within old growth stands.
- Disclose whether non-commercial and prescribed burning treatments will occur in old growth.
- Add Common Stand Exam data to the project record to demonstrate inventory occurred in the project area.

Sage Grouse:

- Describe the short-term effects of burning sagebrush in currently suitable sage-grouse habitat.

Grizzly Bears:

- Clarify the effects of proposed aerial traffic on bears.

CONCLUSION

Upon incorporation of these instructions, the responsible official may sign the Decision Notice for this project. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,

LISA A. TIMCHAK
Forest Supervisor

Cc: Dale Olson, Mike Ryan, Chandra Neils, Cody Hutchinson, Olga Troxel