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April 20, 2026

Dear Supervisor Johnson,

We appreciate your reply of April 16, 2026 to our letter of April 8, 2026. We understand the history of the North Seeley Wildland Urban Interface - Highway 83 Project and its analysis and these facts are already known to us.

However, your letter is largely non-responsive to the issues and concerns we raised. Foremost among these is that the trails project was approved under the emergency authority provided in section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58). The approval of the Seeley Lake Trails Project is invalid because the authority cited does not apply to construction of recreational trails. **Since the recreational trails project is unrelated to fires and fuel treatments and is not an emergency, it cannot be approved under the emergency fire provisions of the IJJA, which has specific purposes.**

The publicly announced project description listed by the Forest Service stated: *“The project proposes vegetation and road management activities to reduce hazardous fuels, restore fire resistant vegetative conditions, maintain or restore fish and wildlife habitat, and provide for public health and safety.”* And, the Project activity was shown as: *Road Decommissioning; Fuel Treatments (Non-Activity Fuels); Forest Vegetation Improvements; Species Habitat Improvements; Road Maintenance; Road Improvements/Construction; Travel Management; Timber Sales (Green)*. There was no mention of the trails project.

The fact that the Lolo National Forest received comments specific to the trails project does not change the fact that an improper authority was cited for approval of the unrelated trails project. By law the Lolo National Forest must immediately rescind and remove this portion of the Decision Notice and enter into a new scoping period and environmental analysis for the trails project.

While the EA contained very minimal analysis of effects on grizzly bear related to the trails project, it is totally insufficient. The only mitigation action related to grizzly bears for the trails project is *“To reduce human-bear conflict, bear-aware educational signs will be installed at proposed mountain bike trailheads to inform trail users of possible bear activity in the area.”*

There was no analysis that considers speed limits, e-bikes, party size, trail density or seasons of use. This must be corrected within a new analysis and Decision Notice.

The funding for this project is also under question, including the \$250,000 committed by the Missoula County Commission which may not be allowed under the language of the recreation bond approved by voters. Until this is resolved, none of these funds may be applied to planning and implementation of the trails project.

We reiterate our request that you withdraw the Seeley Trails Project part of the Decision Notice for the North Seeley Wildland Urban Interface - Highway 83 Project. If the Lolo National Forest decides to move forward with the recreational trails project it must be issued under a different authority than the emergency fire provisions. For example, if the proposal is issued pursuant to the Lolo National Forest Plan and the Travel Plan, it must specifically state this and must undergo a separate scoping period for public comment and have its own environmental effects analysis including a substantive analysis of impacts on threatened and endangered species. This must also include a needs assessment that considers alternatives including using existing roads and trails. This assessment must include existing recreational opportunities in the area including the former Marshall Mountain ski area now dedicated to mountain biking trails. The Seeley Lake trails project would be duplicative and offer opportunities already in existence within Missoula County.

The Missoula County Commission indicated this area was chosen because it is already impacted which suggests it is being treated as a sacrifice zone. This is not allowed within a Grizzly Bear Recovery Area. Any future environmental analysis must include the currently degraded baseline. A Federal court ruling established that an existing degraded environmental baseline cannot be further degraded where threatened and endangered species are present.

We request you provide a response that is specific to our concerns that an improper authority was cited in the Decision Notice for the North Seeley Wildland Urban Interface - Highway 83 Project authorizing the recreational trails project. Hiding this project within a larger, unrelated project is inappropriate and does not meet the intent or the spirit of the public notice requirements.

Sincerely,  
/s/

Mike Bader  
Missoula

George Nickas, Executive Director  
Wilderness Watch

Patty Ames, President  
Flathead-Lolo-Bitterroot Citizen Task Force

Fred Rice  
Missoula

Adam Rissien  
Missoula

Jeff Juel, Forest Policy Director  
Friends of the Clearwater

Keith Hammer, Chair  
Swan View Coalition

Anja Heister and Connie Poten  
Footloose Montana

Arlene Montgomery  
Friends of the Wild Swan

Clint Nagel  
Gallatin Wildlife Association

Greg Price  
Missoula

Mary Price  
Missoula

cc: Missoula County Commissioners