

Ben Johnson
Supervisor
Lolo National Forest
24 Fort Missoula Road
Missoula, Montana 59804

April, 2026

Supervisor Johnson,

Your approval of the Seeley Lake Trails Project is illegal because the authority cited does not apply to construction of recreational trails.

The Forest Service decision embedded this project within the North Seeley Wildland Urban Interface - Highway 83 logging project which was issued **under emergency fire regulations**. *“The North Seeley WUI – Highway 83 project is an authorized emergency action per direction from the Secretary of Agriculture. The Secretary in January 2023 invoked the emergency authority provided in section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58) across 250 high-risk firesheds.”* (page 24, ROD).

The project description listed by the Forest Service states: *“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.”*

The Project activity is shown as:

“Project Activity:

Road Decommissioning; Fuel Treatments (Non-Activity Fuels); Forest Vegetation Improvements; Species Habitat Improvements; Road Maintenance; Road Improvements/Construction; Travel Management; Timber Sales (Green)”

There is no mention of the trails project.

Since the recreational trails project is unrelated to fires and is not an emergency, it cannot be approved under the emergency fire regulations.

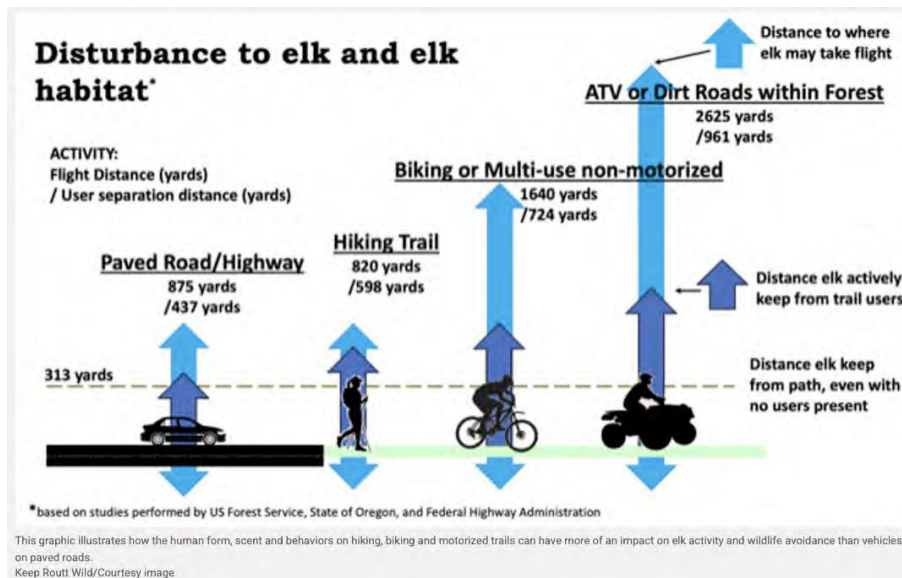
You must immediately rescind this portion of the Decision Notice and enter into a new scoping period and environmental analysis for the trails project.

The Highway 83 BA is deficient and does not properly analyze effects from the trail project and is focused almost exclusively on the vegetation treatments and roads associated with the Highway 83 project. The only mitigation action related to grizzly bears for the trail portion of the 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.” Nothing about speed limits, party size, trail density or seasons of use. There is no analysis of displacement effects on grizzly bears. Science shows that recreational trails displace grizzly bears from prime habitats. The Project is within a designated Grizzly Bear Recovery Area. None of the information below appears in the EA.

Table 2. Non-Motorized and Mechanized Recreation Impacts on Mammals

Species	Avoidance/Flight Response/Other	Area	Source
Grizzly Bear	Use less than expected $\leq 122m$ from trails	Montana	Kasworm and Manley 1990
	267m-1.8km from trails	British Columbia	Thompson et al. 2025
	Approx. 2km from hikers and mountain bikers; greater for females with cubs	Various	Mattson 2019
	Avoided areas within 500m of a recreational trail	Yellowstone National Park/ Wyoming	Gunther 1990
	Selected areas away from human campsites	Yellowstone National Park/ Wyoming	Coleman et al. 2013
	Selected for areas with recreational restrictions	Yellowstone National Park/ Wyoming	Loggers et al. 2023
	Mountain bikers have 14X the risk of an encounter with a grizzly compared to hikers	US/Canada	Mattson 2019
	87% of encounters with mountain bikes occurred at less than 50m, increasing chances of injury	Various	Mattson 2019
	Mountain biking a “grave threat” to grizzly bears due to quiet high-speed use	US/Canada	Servheen et al. 2017; Servheen 2020
	Recreationists disturbed at least 6 denning bears resulting in a human fatality	Canada, Banff National Park	Parks Canada
	Activity within 200m can cause den abandonment and increased cub mortality. Impacts include increased heart and breathing rate and wakefulness	Various	Fortin et al. 2016.



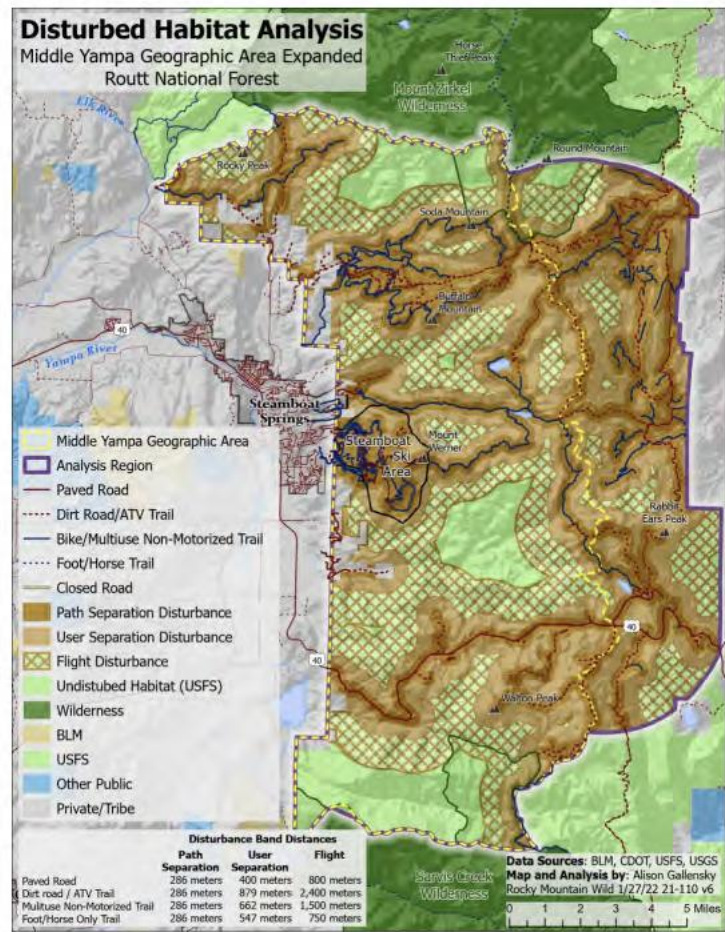


Figure 12 shows the disturbance bands superimposed on the analysis area.

We urge you to withdraw this part of your Decision Notice and initiate scoping for public comment. We request a written reply.

Sincerely,

Mike Bader
Missoula

George Nickas, Executive Director
Wilderness Watch

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