

The Kootenai Forest Stakeholders Coalition

111 East Lincoln Blvd

Libby, MT 59923

 June 11, 2020

Chad Benson, Forest Supervisor

Kootenai National Forest

31374 US Highway 2

Libby, MT 59923

Re: Ripley Draft Decision Notice

Dear Chad:

The Kootenai Forest Stakeholders Coalition (KFSC) supports the proposed Ripley Draft Decision Notice, and the proposed project. As we mentioned to you last week Chad, it was too bad that our involvement with the project was not recognized in the project decision notice.

 Our project team has been involved with this project from the project conception to the present. On May 8, 2019 the following individuals representing the project team attended the field trip : Tim Dougherty (Idaho Forest Group), Wayne Maahs (retired forester), Jennifer Nelson (Lincoln County Forester), Anthony South (Yaak Valley Forest Council), Ed Levert(retired forester and project leader) and Mike Rooney, representing local mountain bike interests. Brian Gilmour of Northwest Motor Sports provided comments through our collaborative also. On August 13, 2019 the KFSC sent the forest comments on the project scoping. Unfortunately the district’s plan to have a summer field trip did not happen. A look on the ground by our group would have helped answer some of our remaining questions.

Based on the current proposal we believe the project is generally in line with the KFSC’s Forest Management Guidelines, although as we indicate in the following comments, we do have several concerns.

**Landscape Level Treatment**- We certainly support your proposal to treat approximately 65% of the project area. The KFSC has long been a proponent of landscape level treatments as a more efficient strategy for numerous reasons, including transportation system efficiencies, economic efficiencies in implementation efforts and harvesting, lessening of water resources impacts, shorter duration of activity and lessening of wildlife impacts.

The Ripley project area is a perfect example of an area where fire exclusion has resulted in an unhealthy climax forest. Root rot (Armillaria) in the Douglas fir is especially noticeable. Unless management efforts are implemented soon this area is very likely to have major insect and disease issues and a stand replacing wildfire. The proposed actions are very important to the health of this forest. Reestablishing ponderosa pine and other seral species is of concern to us and the use of regeneration harvests to bring back these species is critical. From what we can understand from our field trip and the draft EA the silvicultural prescriptions recognize other non-regeneration harvest opportunities including improvement harvests and uneven aged treatments also.

We believe this proposal is an excellent example of treatments within the Wildland Urban Interface (WUI). With the many adjacent private landowners in the area it is vitally important that all agencies and landowners work together to minimize the fire risk.

 **Motorized Recreation-** Our scoping comments had expressed the desire of the Libby area ORV users, represented by the Libby Snowmobile Club President, to have a motorized loop trail and an “ORV” play area. We are not aware that you received a formal comment from their club during the scoping period. The draft decision notice indicates that a loop trail is being provided by the airport, however we do not believe that alternative is what the club was hoping for. It does not appear that an “ORV” play area was addressed.

**Non-Motorized Recreation-** The planned non-motorized bike trail from the Champion Haul Road to Swede Mountain appears to recognize the interest expressed by Mike Rooney, representing an informal group of local mountain bike enthusiasts.

**Wildlife-** One concern we voiced on the field trip was the identification of wildlife corridors within the project area tied to movement of big game from the Cabinet Mountain Range to the winter range on the project area. Will current and proposed actions result in fragmentation of these movement areas? The answer we received on the field trip was that wildlife continuity was provided along stream corridor. Our expectation was that our concern be addressed as it was on the East Reservoir Project, through a formal, or even informal, identification of this continuity over time. Unfortunately the response given in the EA and draft decision notice was not particularly helpful . Hopefully this concern will be addressed in the Final Decision Notice.

**Archeological** – We had raised a concern regarding the preservation of the historic logging railroad grades over the area. This appears to have been adequately addressed in the draft EA.

Thank you for the opportunity to comment.

Doug Ferrell, Interim Chairman

Kootenai Forest Stakeholders Coalition