



Stimson Lumber Company
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August 27, 2024

Norman McCedar

Nathan Gassman - District Ranger
Canoe Gulch Ranger District
12557 US Highway 37
Libby, MT 59923

Dear Nate:

Thank you for taking my comments on the Norman McCedar Project, located just west of Libby and within the Canoe Gulch Ranger District.

I am familiar with this landscape from my work as a land manager for Stimson Lumber Company. Prior to Stimson, I worked many years for the St. Regis Paper Company and for Champion International Corporation, based in Libby. I spent a great deal of time in this area, both working and recreating. Stimson is a privately owned forest products manufacturer and timberland owner with holdings in Idaho, Montana, Oregon, and Washington. Stimson has significant timberland ownership immediately adjacent to this project.

In my work with Stimson, we have been highly encouraging this type of work with both the Kootenai and Idaho Panhandle National Forests. The Wildland Urban Interface (WUI) in northern Idaho and western Montana is vast and is intermingled with, and surrounded by, NFS lands that are in need of fuels reduction and fire protection treatments. The project area immediately adjoins Stimson timberlands in the Parmenter Creek drainage. The project area is located within the Wildfire Crisis Strategy – Kootenai Complex and the Lincoln County WUI which was designated to treat hazardous fuels surrounding communities in NW Montana. These designations make this an ideal project to further enhance cross-boundary efforts in the Libby-Troy area to mitigate wildfire threats to these communities.

Stimson Lumber Company strongly supports activities in this proposed action. We encourage fuels treatments over as much of the project area as possible. Effective fuels treatments include reducing stocking levels through harvest activities including thinning, selective harvest, and regeneration harvest methods. Reduction of basal area and removal of ladder-fuels will be essential to provide optimum fire protection in the near term. Providing shaded fuels breaks along all permanent travel routes and using temporary roads to access timber stands will ensure that the area transitions to a more fire resilient state where, should a fire occur, it can be easily brought under control. This will ensure the safety of nearby residents, the recreating public, and agency firefighters. Stimson specifically requests that treatments occur on all NFS lands adjoining our property boundaries. Stimson Lumber Company has a vast network of roads accessing our timberlands in this area and we look to coordinate and cooperate with the Canoe Gulch Ranger District on the use of these existing roads to access the project area and for removal of forest products. You are familiar with our local timberlands manager, Bruce Rowland (406) 370-5657.

Several current Directives make this landscape an extremely high priority for treatment. Those include:

1. Lincoln County has an Emergency Declaration asking the Forest to actively manage the Forest to increase forest health and reduce wildfire risk. The Norman McCedar project is listed by the Forest as a project that fits under this Emergency Declaration.
2. In 2022 the Kootenai National Forest was awarded the Libby Surround Stewardship Joint Chiefs' funding to treat hazardous fuels on 4,605 acres of land surrounding the community of Libby, MT. The project is part of an ongoing cross-boundary effort to connect past, present, and future fuels treatments across lands of all ownerships. The Norman McCedar project lies within the area identified for need.
3. Kootenai National Forest was granted \$19.3 million from the Bipartisan Infrastructure Investment and Jobs Act to plan and implement wildfire mitigation work on up to 7,200 acres in and around the Kootenai National Forest over the next two years. The Norman McCedar Project was identified as one of these high-risk areas due to its location to the greater Libby area.
4. The Norman McCedar project area was identified as a "priority area" within the plan for high fire risk and forest health concerns under the Montana Forest Action Plan

The proposed action is designed to treat and reduce fuels within the project area by shifting species composition, size class, and stand densities towards Forest Plan desired conditions. Stimson believes the faster this Project can be implemented, the better it will be for the forest, the community of Libby and for Stimson's adjacent timberlands.

Stimson encourages the District to design and implement a model project which treats all stages of forest fuels within the WUI and the Kootenai Complex, in full alignment with the Agency's stated wildfire strategy directives. This project can serve as an example of cross-boundary coordination that seeks to not only improve the declining health of the National Forest but to provide wildfire protection to adjoining private property, local residences, and critical infrastructure.

In closing, Stimson fully supports the proposed action and encourages the district to treat as many acres as possible. This is a very important landscape to conduct fuels reduction treatments to reduce the risk of catastrophic fire at Libby's doorstep. It is also a prime landscape to perform effective silvicultural treatments to transition declining timber stands to more productive and healthy younger timber stands. Stimson looks forward to partnering with you in this endeavor.

Sincerely,



Barry N. Dexter
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