

Certified Mail # 9589 9719 5270 0699 7438 10

May 4, 2026

Kootenai National Forest

Libby Ranger District

Attn: District Ranger Nathan Gassmann

12557 US Highway 37

Libby, Montana 59923

**RE: COMMENTS ON THE SUPPLEMENTAL ENVIRONMENTAL
ASSESSMENT FOR THE RIPLEY PROJECT.**

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, and Council on Wildlife and Fish would like to submit the following comments for the supplemental Environmental Assessment (EA) for the Ripley Project. Please note that these comments include one attachment, Attachment #1, that has relevant portions of publications and/or reports cited in these comments.

- A. This proposed project will trigger violations of the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), including the 2012 Planning Rule, the Administrative Procedures Act (APA), the Migratory Bird Treaty Act (MBTA) and the Endangered Species Act (ESA) for the following reasons.

1. The Ripley Project is triggering a violation of the Kootenai National Forest (KNF) Revised Forest Plan (RFP) in regards to snag management.

The RFP requires the agency to complete snag surveys for all proposed vegetation treatment units, in order to inventory the existing snag numbers (FW-GDL-VEG-04). There have been no snag inventories cited in the agency NEPA documents. In fact, the agency did not include this snag guideline in the Appendix A addressing Forest Plan consistency. Without this inventory, the agency cannot identify the number of snags or green replacement trees that have to be averaged out per vegetation groups identified in Table 4 of the RFP. It is clear the agency is ignoring this RFP guideline for management of snags, in violation of the NFMA.

2. The agency is violating NFMA and 2012 Planning Rule by failing to monitor the effects of timber harvest on birds associated with snag habitat.

The following 32 bird species require snags for nesting on the KNF (USDA 2018):

American Kestrel, Barred Owl, Black-backed Woodpecker, Black-capped Chickadee, Boreal Chickadee, Brown Creeper, Boreal Owl, Chestnut-backed Chickadee, Downy Woodpecker, Flammulated Owl, Hairy Woodpecker, House Finch, House Sparrow, House Wren, Lewis's Woodpecker, Mountain Bluebird, Mountain Chickadee, Northern Flicker, Northern Hawk Owl, Pileated Woodpecker, Pygmy Nuthatch, White-breasted Nuthatch, Red-breasted Nuthatch, Red-naped Sapsucker, Northern Saw-whet Owl, Northern Pygmy Owl, Three-toed Woodpecker, Tree Swallow, Violet-green Swallow, Western Screech Owl, Williamson's Sapsucker, and Wilson's Warbler.

Many of these snag-associated birds have an identified conservation concern. For example, the KNF RFP EIS Table 66 at page 347-350 identify 15 of these birds as Priority Level I-III. Table 65 in the RFP FEIS at 346 identifies 3 of these species as Birds of Conservation Concern. Table 64 at page 345 in the RFP FEIS identify 5 of

these species as Species on Continental Importance. Thus the importance of providing snag habitat for these birds is a critical factor in ensuring their persistence on the KNF.

The KNF has two sensitive bird species associated with snags, the Flammulated Owl and the Black-backed Woodpecker.

In spite of the numbers of birds associated with snags (at least 32) as well as the identified conservation concern for approximately half of these birds, the KNF snag guideline has no biological basis as per maintaining viable populations of these bird species. The selection of snag levels to be retained are arbitrary, in violation of the APA and the NEPA. These snag numbers are not a valid "proxy" for identifying viable populations of associated bird species. As per a recent court decision (Lead Case NO. CV 23-110-M-DWM, Member Case No. CV-23-154-M-DWM), the agency use of a proxy for evaluating population viability must be based on valid data, which in case for the KNF snag direction, there is no association ever made between the snag levels recommended in the snag guideline and population levels of associated bird populations.

The snag guideline does not actually require any specific numbers of snag within landscape vegetation groups, as green trees can be substituted for snags. As such, this guideline does not even require any given number of snags for wildlife. Entire landscapes such as the heavily-logged Ripley project area, could be almost entirely devoid of snags and still meet the RFP snag guideline. So this snag guideline is a violation of the NFMA as it does not require any level of viability for associated wildlife species.

The KNF RFP is a violation of the 2012 Planning Rule as the agency has not identified a focal species for snag habitat. Although the Hairy Woodpecker is included in the MIS landbird assemblage, it is only one of 5 species identified as MIS. And it is supposed to be an MIS for insectivores (RFP FEIS 205). There has

been no association made in the RFP and associated FEIS as to how the Hairy Woodpecker is to indicate the impact of logging on 32 bird species associated with snags. There is also no evidence that the effects of logging on the Hairy Woodpecker is being monitored on the KNF. There is no information available on the logging effects on Hairy Woodpecker populations in any of the KNF monitoring reports. As such, the impact of past and planned logging in the Ripley Project will be unknown, in violation of both the NEPA and the NFMA.

3. The KNF is violating the NEPA by claiming that the Ripley Project will not have any significant adverse impacts for wildlife, which would include 32 birds associated with snags.

As noted above, the Ripley Project, and as also noted in the project design features, does not require retention of any snags in units as green trees can serve as replacements. Thus the impact of the project on 12,398 acres of vegetation treatments where snags will be reduced and/or eliminated, will be severe, as this is 66% of the project area (the Ripley project area is 29.4 square miles, or 18,816 acres as per Table 12 in the project EA at page 23). Also, due to a lack of any inventories of current snag levels, it is unknown what current habitat levels are for birds in the project area. This current level has important implications, as the impact of past logging project on birds is unknown, yet is being claimed as “nonsignificant.” In addition it is not biologically possible that a loss of snag habitat on 66% of this landscape will have no direct adverse impacts the 32 birds associated with snags, including about half of these that have an identified conservation concern, including the sensitive Flammulated Owl. Given that the agency has no basis for claiming that past impacts as well as planned impacts on 32 bird species have not, nor will not be significant, the agency’s use of an EA for this project is clearly invalid.

4. The agency is violating the NEPA and the NFMA by continuing to implement a clearcutting program without any assessment of these impacts in the RFP FEIS, or even within the Ripley project area.

The Ripley Project proposes 3,223 acres of clearcuts, including many that exceed 40 acres in size. Neither the RFP FEIS or the Ripley Project EAs evaluate the impact of clearcuts on wildlife. As previously noted, clearcuts create an irreversible impact on snag habitat, as once any snags left in harvest units blow over in several years, there will likely be no replacements for up to 100 years. The probability of any green replacement trees left for snag recruitment actually providing future snag habitat has never been evaluated in the RFP FEIS. The claim that a few green replacement trees can maintain snags over the next 100 years is a NEPA and APA violation, as how this would actually be accomplished on the ground was never defined.

In regards to clearcutting, also neither the RFP FEIS or the Ripley project NEPA documents address how the size of clearcuts impact wildlife. Thus the agency's implementation of this clearcutting program, including large clearcuts over 40 acres in size, has never undergone any NEPA valuation. This makes it's implementation a violation of both the NEPA and then NFMA, as all clearcuts have severe impacts on snag-associated wildlife. The RFP needs to be amended to include a valid analysis of how clearcutting programs affect snag habitat for 32 bird species.

The KNF RFP also needs to be amended so that there will be "sideboards" established for the level of clearcutting that can occur within any given area of the landscape. Given the severe, long-term impacts of clearcutting on 32 bird species that require snags for nesting, the level of clearcuts that can occur within any given portion of the landscape needs to be limited to ensure that adequate forested habitat containing snags is retained for wildlife. Currently, the lack of any restrictions for clearcutting acreages within any portion of the KNF allows the creation of large "black holes" lacking populations of wildlife associated with snags. It is unknown how this ongoing program of "black holes" for snag habitat is impacting wildlife, including due to a lack of monitoring by the KNF.

The RFP FEIS lack of analysis on clearcutting impacts not only allows the agency to conceal the impacts of clearcutting on 32 bird species associated with snags, but it also fails to address the significant impacts clearcuts have on localized climates for wildlife. It is recognized that trees provide a cooling effect in forested landscapes (Milman 2024). The removal of these trees in clearcuts will trigger huge temperature increases for the local areas. Knoss (2016) reported that clearcuts can have temperatures as high as 18 degrees Fahrenheit than surrounding forested areas. And these high temperatures in clearcuts drawn down the temperatures in adjacent forests in a process known as “vegetation breeze” (Lawrence 2022). Until the agency amends the RFP to address how these affect local climatic conditions for wildlife, any clearcutting programs are a violation of the NEPA and the NFMA, including the Ripley project.

The KNF RFP and associated FEIS is also completely silent on the practice of poisoning pocket gopher populations in clearcuts in order to promote tree regeneration. These poisoning programs include the use of strychnine, which is a known effective poisoning bait for pocket gophers (Bidwell 2017). However, there is a potential for secondary poisoning of other wildlife, from carnivores, such as the threatened wolverine, grizzly bear and lynx, to forest raptors such as the Great Gray owl, when poisoned gophers die on the surface. The Targhee National Forest (1997) has a restriction of poisoning pocket gophers in clearcuts that are within half a mile of Great Gray Owl nests.

There are known severe wildlife impacts from clearcutting, yet the KNF RFP has failed to not just evaluate these impacts (snags) but has failed to even identify these impacts (poisoning pocket gophers). Until the RFP is amended to do a valid assessment of clearcutting effects on wildlife, no further clearcutting is legal, including in the Ripley project.

5. The agency will violate KNF RFP FW-GDL-WL-16 with the Ripley Project by a failure to demonstrate that suitable levels of raptor surveys have been done; surveys are required before rather than after a project is

implemented in order to demonstrate compliance with the RFP; this is also a NEPA violation because the agency is providing false information to the public by suggesting surveys have been done, or alternately is violating the NEPA by failing to provide survey information to the public; finally, if the agency has not actually completed any forest raptor surveys in the Ripley project area, they are violating the NEPA by failing to estimate the number of raptor nest sites that will be destroyed by timber management activities on 66% of the project area.

KNF RFP GW-GDL-WL-16 states that management activities on NFS lands should avoid/minimize disturbance at known active raptor nests, including owls; timing restrictions and distance buffers should be based on the best available information, as well as site-specific factors. There are at least 7 forest raptors that may occur in the project area forests, including the documented Northern Goshawk nest (Project EA page 101-102). The other raptors noted to be present on the KNF (RFP FEIS Tables 33,64-66) include the Great Gray Owl, Boreal Owl, Flammulated Owl, East Screech Owl, Western Screech Owl, and Sharp-shinned Hawk. The guideline requires protection of "known" raptor nests. This clearly implies that surveys will be done to identify any such nests in the project area. The agency claims that these surveys have been done for the Ripley project at page 78 in the project EA, where it is stated: There are no known currently active nests within the project area. This suggests to the public that surveys for raptor nests have been conducted, as otherwise, the agency could not claim that no nests are present. However, there are no survey results provided for any raptor except the Northern Goshawk, in the project EA at 101-102. It seems highly improbable that there were no raptor nests located, except for the goshawk nest, on the 12,398 acres planned for treatment; this is 66% of the project area. It seems highly likely that the agency has not conducted many, if any, raptor surveys so that they can meet the guideline to protect active nests. The suggestion that raptor surveys have been done is a violation of the NEPA by misrepresenting agency actions to the public, as well as an NFMA violation for failing to complete the required surveys.

The agency then implies in the EA at 78 that surveys will be ongoing for raptors during project planning and implementation, which means this project is complaint with this guideline. A recent court decision (Lead Case No. CV 23-110-M-DWM, Member Case No. CF-23-154-M-DWM) noted that claiming that the Forest Plan will be met after the project is implemented is a violation of the NFMA as merely stating the Forest Plan will be followed is not the same as demonstrating that the Forest Plan has been followed. In order for the KNF to adhere to the guideline to survey for raptor nests, this has to be done prior to project decisions so that the agency is able to demonstrate survey results. This is necessary in order for the agency to demonstrate also how protective buffers and timing restrictions have been included within the project design.

The agency appears to be violating the NEPA, in addition to falsely suggesting that raptor surveys have been conducted, to a failure to provide raptor survey results and protective measures to the public.

Finally, the agency is violating the NEPA by failing to evaluate the impact of the Ripley project treatment on 12,398 acres of the project area, or 66% of the project area, on forest raptors due to a failure to complete valid, reliable surveys for at least 7 raptor species that could occur in the project area. This includes one sensitive species, the Flammulated Owl. This owl is a Priority I Montana Species, and a Bird of Conservation Concern for BCR Region 10 (RFP FEIS Tables 33, 64-66).

6. The agency will violate the NEPA with the Ripley Project by failing to provide valid information on how the project will impact a Management Indicator Species, elk.

There is no analysis in the Ripley project as to how the project will affect elk security. This security is important not just for elk, but for the grizzly bear and wolverine as well. It is impossible to determine what the current level of elk security is in the project area, as defined by the current best science, or Hillis et al.

(1991). It is unclear if security blocks are being defined as having hiding cover, as per the Hillis (1991) definition of such blocks being at least 250 contiguous acres of forest cover. It is unclear if security areas include active motorized routes that are not open to the public. It is also not clear if this current level of scientifically-defined elk security meets the minimum recommended level of 30% (Id.). Valid measurements of elk security will also be important to the grizzly bear and wolverine, as this is the only measure the agency uses for the Ripley project for blocks of cover that have no motorized activity before, during or after the project. The post-project measures of elk security need to include the requirement for hiding cover. It is unclear if the threshold for significant impacts, or at least 30% security, is currently met, will be met during project activities, or will be met post-project in order to avoid significant adverse to elk and the other species it indicates as per security.

There is also no analysis of habitat effectiveness for elk, or the percentage of the landscape that is available to elk in the summer due to displacement from active motorized routes (Christensen et al. 1993). This measure is also important as it provides a threshold for which significant impacts occur for elk, but as well, other species sensitive to motorized activity, as the grizzly bear and wolverine. Without a valid analysis of elk habitat effectiveness, the agency has not demonstrated that no significant adverse impacts may already exist, may occur during project implementation, or may occur post-project due to post-sale activities, not just to elk, but to the wolverine and grizzly bear as well. The agency failed to identify that the planned open road density during project activities, or 2.4 miles per section as noted in the project EA at 102, exceeds the 50% habitat effectiveness level noted as needed to prevent significant displacement of elk (Christensen et al. 1993).

Without any valid assessment of elk security as per the current best science, the agency is violating the NEPA by claiming in the project EA at 102 that the project will maintain existing levels of elk security during the hunting season. Administrative use of roads in security areas, as well as cover reductions in security areas, do not constitute "maintenance of existing security.

7. Agency claims that the Ripley Project will not significantly impact the threatened grizzly bear is as violation of the NEPA and the ESA.

The project EA at 68 states that the proposed project will not significantly affect and threatened species. It is stated that the existing baseline is having adverse impacts on the grizzly bear, but the project disturbances and minor habitat changes are not significant in context because they are localized, temporary, and mitigated, and long-term vegetation treatments will improve forage conditions.

The claim that impacts are temporary is false because the project is expected to last 25 years.

The claim that keeping the project open road density to 2.4 miles per section (EA at 69) does not prevent significant adverse impacts is clearly false. As per the current best science, grizzly bear mortality rate increases when open road densities exceed 1 mile per section (Proctor et al. 2019; Proctor et al. 2022). As noted by Bader and Sieracki (2022), an open road density of a mile or less per section provides a survival rate of 95% and a static growth rate. However, an open road density of 2.4 miles per section provides a less than a 75% survival rate, and a negative growth rate with a rapid decline (Id.). Maintaining 2.4 miles of open roads, including to allow public firewood harvest, creates “sink habitat” for grizzly bears which is an adverse effect. The agency did not define what criteria were being use to quantify at what level the survival rate related to open road densities was determined to be nonsignificant. They provided no science to support their claim that a survival rate of 75% or less, with a rapidly declining growth rate, is not a significant adverse impact on the bear population occurring in the project area.

The displacement effects of mountain biking on existing and planned new trails was not included in the agency claims to maintain open road densities below 2.4 miles per section.

The claim that forage will increase for the grizzly bear in the long-term was not supported with any evidence. Important forage resources were not identified for protection from disturbances, especially roads, as is recommended to maintain grizzly use post-project (Proctor et al. 2022). Thus the amount of disturbance during the 25 year project for high quality forage areas for bears is unknown, given that these areas were not identified. If bears are displaced from forage benefits provided from vegetation treatments, there is no benefit to bears.

There was no analysis of the impacts of displacement of grizzly bears from 12,398 acres of vegetation treatments. This was noted to be an important factor in assessment of management of grizzly bears by the IGBC (1998) many years ago. This assessment of displacement of bears from areas where vegetation treatments occur has most recently been emphasized by Proctor et al. (2022). The agency did not provide the criteria they used to determine that treatment of 12,398 acres of bear habitat, on 66% of the Ripley project area, will not significantly impact grizzly bears due to a reduction in foraging habitat due to displacement.

The agency's claim that current and planned levels of grizzly bear security do not constitute significant adverse effects on the grizzly bear were based on false measures of security. The KNF identifies grizzly bear security as any areas further than 0.5 miles from an active motorized route, but there is no limit to the size of security areas. As noted in the project EA at 44, there are small blocks of security scattered across the Ripley Project Area. The EA at page 15, Table 6, notes that security blocks can be as small as one acre; the largest size of a security block in the Fisher BORZ is 999 acres. The current best science identifies that grizzly bear security areas should be at least 2,500 acres (Proctor et al. 2019; Proctor et al. 2022).

The levels and sizes of valid security blocks, based on the current best science, are never provided for the Ripley project before, during, or after project completion, in violation of the NEPA and the ESA. The current best science recommends a

level of 60% security to promote population persistence and use of habitat by female grizzly bears (Proctor et al. 2019; Proctor et al. 2022). Since accurate information is not provided in the analysis of grizzly bear security areas, the agency has no basis for claiming no significant adverse effects will be triggered on the grizzly bear from the Ripley project, in violation of the NEPA and the ESA.

The agency did not evaluate the impact of the increases of summer temperatures that will result in the Ripley project area on grizzly bears. These temperature increases will most likely reduce the time grizzly bears can forage in this landscape due to heat stress. The level of reduced occupancy of the project area by grizzly bears due to increased summer heat was never evaluated, even though the agency claimed there would be no significant adverse effects on the grizzly bear from the Ripley Project, in violation of the NEPA and the ESA.

The agency did not address how poisoning of pocket gophers will affect the mortality risk of grizzly bears in the project area. The potential for secondary poisoning from strychnine from poisoned gophers was not addressed. These poisoned gophers could be available to grizzly bears that die either in their burrows, and are dug out by bears, or that die on the surface and are encountered by grizzly bears. The Ripley project proposes clearcutting on 3,223 acres. The agency has violated the NEPA and the ESA by failing to estimate the number of pocket gophers that may be available per acre of poisoning, and how many poisoned gophers would kill a grizzly bear, either cub or adult.

8. The agency's claims that the Ripley Project will not have any significant adverse impacts on the threatened wolverine are a violation of the NEPA and the ESA.

As noted previously, the agency claims in the Ripley project EA that 68 that this project will have no significant adverse impacts on the wolverine. This claim was made without evidence, since there was no analysis of how roads and industrial

logging impact wolverine landscape use. The high amount of landscape disturbance (12,398 acres or 66% of the project area), along with the high total active motorized route density required from both open road, and administrative use on closed roads, was claimed to have no significant adverse impacts on wolverine even though the current best science indicates wolverine are highly sensitive to both roads and other landscape disturbances (Stewart et al. 2016; Scrafford et al. 2018). The agency did not cite any evidence to counter the conclusions of either of these published scientific reports that these conclusions are controversial, as reported in some other publication.

The agency also did not address how the increased summer temperatures that will occur in the Ripley project area due to vegetation thinning/removal on 12,398 acres will affect habitat availability for the wolverine, in violation of the NEPA and the ESA. This species is known to be highly sensitive to heat (Copeland et al. 2010). The agency did not cite any science to indicate wolverine would not experience reduced habitat availability due to increased summer temperatures created by the massive deforestation Ripley project.

The agency also did not address how the reduction in available wolverine caching sites, due to deforestation that will reduce spring snow packs (Wright and Ernst 2004) will affect habitat suitability for the wolverine. With reduced snow pack, wolverine will likely use this area less as it will be more difficult to cache food with less snow in logged forests. Failure to assess this impact is a violation of the NEPA and the ESA.

The agency did not address how poisoning of pocket gophers with strychnine in the planned 3,223 acres of clearcuts will affect wolverine mortality via secondary poisoning from consumption of poisoned pocket gophers. There was no estimate provided as to what the expected number of wolverine will be killed during the 25-year project due to this pocket gopher poisoning program in clearcuts. Failure to assess this impact is a failure of the NEPA and the ESA.

9. The agency did not assess the impacts of the Ripley Project on the recovery of the grizzly bear by creating dispersal barriers into the failing Cabinet-Yaak grizzly bear recovery zone.

The ESA requires agencies to manage for the recovery of a threatened species, including the grizzly bear. The Ripley project lies between the Northern Continental Divide Ecosystem (NCDE) Grizzly Bear Recovery Zone, and the Cabinet-Yaak Recovery Zone. Given the precarious status of grizzly bears in the Cabinet-Yaak ecosystem, the long term persistence, and hence recovery of grizzly bears as per this Cabinet-Yaak ecosystem, clearly depends upon dispersal of grizzly bears from the healthy bear populations in the NCDE to the Cabinet-Yaak ecosystem. The current degraded conditions of the Fisher BORZ where the Ripley project is planned, due to high open and total road densities, and a severe lack security, are likely playing a significant role in the ongoing failure of bears to supplement the Cabinet-Yaak ecosystem. This problem will continue with the Ripley project, as dispersal abilities of bears will only increase. Yet the agency did not identify that the Ripley project will perpetuate, and likely exacerbate, the recovery of the Cabinet-Yaak ecosystem, in violation of the NEPA and the ESA.

10. The agency is violating the NEPA by used Forest Plan standards/guidelines as the measure of project impacts to the grizzly bear.

The Project EA at pages 22-24 define Forest Plan standards for the grizzly bear (II.A, II.A.1, II.B and II.B1. These standards allow unlimited temporary increases in roads open to the public, and unlimited increases in total roads within the Fisher BORZ. Thus the Ripley Project will meet this Forest Plan direction, because the planned increases in open and roads open to the public are allowed by the Forest Plan. There are no time limits for what is defined as “temporary” in these Forest Plan standards. Why is a 25-year project defined as temporary for grizzly bears? Due to a lack of any definition as to what “temporary” means, the agency is essentially allowing increases in roads open to the public during the entire Forest Planning period, which conflicts with the term “temporary.”

The agency did not define why either existing or project-level increases in total and roads open to the public are not currently, or will not increase adverse impacts to the grizzly bear, during project implementation. The current best science as per Proctor et al. 2019, Proctor et al. 2022, and Bader and Sieracki 2022 does not support agency contentions that meeting Forest Plan standards will prevent significant increases in adverse impacts to the grizzly bear. In addition, the agency did not actually provide the total and roads open to the public densities for the Ripley project area, or even define direct impacts of the project. Without this analysis, the agency claims of no significant adverse impacts to the grizzly bear from the project lack any support. For example, Table 10 of the EA at page 21 shows that the total road density in the Fisher BORZ will increase from the current level of 2.6 miles per section to 2.93 miles per section during the 25-year project. The direct impacts within the Ripley Project Area were not provided. However, claims that increases in the Fisher BORZ in total road densities during the project will not have significant adverse effects on the grizzly bear lacked any supporting evidence, in violation of the NEPA and the ESA.

What is more invalid as per using the Forest Plan standards for open road management in BORZ is that the term “open road” does not include all the motorized activity that would be occurring for grizzly bears within the BORZ. Public access is a reasonable measure of the direct mortality risks to grizzly bears from poaching. However, discounting all remaining access, including heavy logging traffic, and the extensive agency traffic that is required to plan, implement logging projects, is being discounted in this Forest Plan standard. As per Proctor et al. (2022), the displacement effects of roads on bears, including use of habitat, also have population effects including reduced productivity due to loss of habitat. As such, this important displacement impact of non-public motorized traffic is completely discounted in the Forest Plan standards, in violation of the NEPA and the ESA. Without an analysis of project impacts of roads that include all motorized use as per displacement effects on grizzly bears, the agency cannot provide meaningful analyses on project impacts on the grizzly bear. This current assessment of project impacts on the grizzly bear from the Ripley Project are invalid and a violation of the NEPA and the ESA:

11. The agency is violating the NEPA by failing to provide an action alternative that responds to public issues and concerns.

In spite of the identified public concerns in regards to the initial Ripley project, the agency has continued forward with the same proposal. There was no alternative developed that would address public issues and concerns, in violation of the NEPA. Such an alternative would include improvements of grizzly bear habitat by establishment of at least some valid security habitat, moving towards 60% security recommended by the current best science (Proctor et al. 2019; Proctor et al. 2022). Such an alternative would thus result in a greatly reduced open and total road density, since roads would not be required for vegetation treatments on a total of 12,398 acres of grizzly bear habitat. Greatly improving grizzly bear habitat in the Ripley project area would in turn improve overall viability and hence recovery of the imperiled grizzly bear population in the Cabinet-Yaak Ecosystem. The rationale for proposing the same Ripley project as initially defined is based solely on harvesting timber, with no wildlife habitat objectives. Implementing a proposal without a single wildlife habitat objective is a violation of the NFMA, as viability of wildlife cannot be maintained without implementing habitat objectives on the landscape.

The agency needs to respond to public issue and concerns by developing an action alternative that has habitat objectives for wildlife, including threatened species and 32 bird species associated with snags. In addition, the agency needs to adhere to the NFMA by completing raptor surveys prior to project implementation, and adhere to the NEPA by defining how raptor survey information was incorporated into project designs.

Regards,

A handwritten signature in cursive script, appearing to read "Sara Johnson".

Sara Johnson, Director, Native Ecosystems Council, PO Box 125, Willow Creek, MT 59760; phone 406-579-3286; sjohnsonkoa@yahoo.com.

SS for

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-410-3373; wildrockies@gmail.com.

SS for

Steve Kelly, Director, Council on Wildlife and Fish, PO Box 4641, Bozeman, MT 59722; phone 406-920-1381; troutcheeks@yahoo.com.

Attachment #1 for comments submitted for the Ripley Project on the Kootenai National Forest by NEC et al. on May 4, 2026.

Attachment #1 includes relevant portions of the following reports and/or publications:

Bader, M., and P. Sieracki. 2022. Grizzly bear denning habitat and demographic connectivity in Northern Idaho and Western Montana. *Northwestern Naturalist* 103:209-225.

Bidwell, T. 2017. Controlling pocket gophers. Ag Research: <https://agresearch.okstate.edu/>.

Christensen, A., L. Lyon, and J. Unsworth. 1993. Elk management in the Northern Region: considerations in Forest Plan updates or revisions. USDA Forest Service Gen. Techn. Report INT-j303.

Copeland, J., K. McKelvey, K. Aubry, A. Landa, J. Persson, R. Inman, J. Krebs, E. Lofroth, H. Golden, J. Squires, A. Magoun, M. Schwartz, J. Wilmet, C. Copeland, R. Yates, I. Kojola, and R. May. 2019. The bioclimatic envelope of the wolverine (*Gulo gulo*): do climatic constraints limit the geographic distribution? *Canadian Journal of Zoology* 88:233-246.

Hillis, M., M. Thompson, J. Canfield, L. Lyon, C. Marcum, P. Dolan, and D. McCleerey. 1991. Defining elk security: the Hillis Paradigm. Pages 38-45 in *Proceedings of a symposium, Elk Vulnerability Symposium, Bozeman, MT April 10-12, 1991*.

Interagency Grizzly Bear Committee Taskforce Report. 1998. Grizzly bear/motorized access management.

Knoss, T. 2016. Temperature changes wreak havoc in deforested areas. Colorado Arts and Sciences Magazine, February 2016.

Lawrence, D. M. Coe, W. Walker, L. Verchot, and K. Vandecar. 2022. The unseen effects of deforestation: biophysical effects on climate. *Frontiers in Forest and Global Change*. March 2022, Volume 5, Article 756116.

Milman, O. 2024. Very cool: trees stalling effects of global heating in eastern US, study finds. *The Guardian* February 17, 2024.

Proctor, M., B. McLellan, G. Stenhouse, G. Mowat, C. Lamb, and M. Boyce. 2019. Effects of roads and motorized human access on grizzly bear populations in British Columbia and Alberta, Canada. *Ursus*.2019(30e2):16-39(2020).

Proctor, M., C. Lamb, J. Boulanger, A. MacHutchon, W. Kasworm, D. Paetkau, C. Lausen, E. Palm, M. Boyce, and C. Servheen. 2022. Berries and Bullets: influence of food and mortality risk on grizzly bears in British Columbia. *Wildlife Monograph*, the Wildlife Society. DOI: 10.1002/wmon.1078.

Scrafford, M., T. Avgar, R. Heeres, and M. Boyce. 2018. Roads elicit negative movement and habitat-selection responses by wolverines (*Gulo gulo luscus*). *Behavioral Ecology*. doi:10.1093/beheco/arx182.

Stewart, F., N. Heim. A. Clevenger, J. Paczkowski, J. Volpe, and J. Fisher. 2016. Wolverine behavior varies spatially with anthropogenic footprint: implications for

conservation and inferences about declines. *Ecology and Evolution*.
Doi:10.1002/ece3.1921.

USDA. 1991. Interim direction for the management of TES species. USDA Forest Service, Region 1, Wildlife and Fisheries Staff.

USDA. 1997. Revised Forest Plan for the Targhee National Forest. April 1997. USDA Forest Service, Intermountain Region.

USDA. 2013. Final Environmental Impact Statement for the Revised Land Management Plan, Kootenai National Forest.

USDA. 2018. Environmental Assessment for the Glacier Loon Fuels Reduction and Forest Health Project. Swan Lake Ranger District, Flathead National Forest.

Wright, J. and J. Ernst. 2004. Wolverine, *Gulo gulo luscus*, resting sites and caching behavior in the boreal forest. *Canadian Field-Naturalist* 118:61-64.