



REGION 8

DENVER, CO 80202

May 26, 2026

Chadwick Benson, Forest Supervisor
Kootenai National Forest
506 U.S. Highway 2
Libby, Montana 59923

Dear Supervisor Benson:

The U.S. Environmental Protection Agency Region 8 reviewed the U.S. Department of Agriculture Forest Service Draft Supplemental Environmental Impact Statement (SEIS) for the Pilgrim Creek Timber Sale Project (Project) in accordance with Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The CAA Section 309 role is unique to the EPA. The CAA Section 309 requires the EPA to review and comment on the environmental impact of any proposed Federal action subject to NEPA's EIS requirements and make the EPA's comments public.

This SEIS is being proposed by the USFS in response to a 2019 court order that directed the USFS to prepare a SEIS and to reinstate Project Endangered Species Act (ESA) consultation with the U.S. Fish and Wildlife Service. Under the 2013 Project Record of Decision (ROD), the USFS authorized timber harvest on approximately 1,411 acres and prescribed burning on approximately 4,564 acres of USFS-managed lands near the community of Noxon, Montana, in the Pilgrim Creek watershed. As of the writing of this letter, most of the 2013 Project has been completed. The Kootenai National Forest is proposing to complete the remaining activities authorized by the May 2013 ROD. These activities include approximately 219 acres of timber harvest, 4,564 acres of prescribed burning, 370 acres of planting, and 4.7 miles of road storage.

The SEIS analysis is limited to the evaluation of the Clark Fork Grizzly Bears outside the recovery zone (BORZ) in response to the court order. In addition, due to changes in ESA species status, the analysis includes threatened and endangered species (Wolverine, Yellow-billed Cuckoo, Whitebark Pine) and Proposed Pollinators. Due to the focused scope of the analysis, the EPA has no comments on the Pilgrim Creek Timber Harvest SEIS.

The EPA appreciates the opportunity to review the Draft SEIS. If you have any questions about this letter, please contact the Region 8 NEPA Branch inbox at EPA-R8-NEPA@epa.gov.

Sincerely,

Daniel Heffernan
Associate Deputy Regional Administrator
U.S. EPA Region 8