Data Submitted (UTC 11): 3/12/2024 4:00:00 AM
First name: Barry
Last name: Dexter
Organization: Stimson Lumber Company
Title: Senior Resource Advisor
Comments: March 4, 2024

Snowshoe Granite 1000 Roadside Fuelbreak Libby Ranger District - Canoe Gulch

Attn: Jennifer Runnels 12557 Hwy 37

Libby, MT 59923 Dear Jennifer:

Thank you for the opportunity to comment on the Snowshoe Granite Roadside Fuelbreak Project located immediately adjacent to Libby.

I am familiar with this landscape from my work as a land manager for Stimson Lumber Company and as a resident of Libby for 40 years. Stimson is a private forest products manufacturer and timberland owner with forestland holdings in Idaho, Montana, Oregon, and Washington. Stimson owns approximately 100,000 acres of timberland in the same general vicinity as this proposed project.

Stimson is highly supportive of this type of work in the Kootenai National Forest. Our company has experienced significant losses to our lands in Montana, over the last decade from wildfires originating on federal lands, burning on to our managed forestlands. Risks are growing and public safety is now becoming a real concern for communities like Libby. The Wildland Urban Interface in Lincoln County is vast and surrounded by NFS lands. The Montana Forest Action Plan and the Lincoln County Wildfire Protection Plan highlight the significant risks faced in the county from wildfire. This project aims to reduce these risks in a small area of the county that has a high density of private property. This project is located primarily along existing county roads that serve as the ingress and egress routes for a substantial number of private residences in this area.

Documentation states that you have not made a final determination on use of the Linear Fuelbreak categorical exclusion. This project appears to be a perfect use of this tool, authorized under the Bipartisan Infrastructure Law. We highly encourage its use in this situation. Libby is an at-risk community and time is of the essence to complete fuels reduction work you and your team are anticipating. A tremendous backlog of critical forest fuels reduction work exists on the Kootenai and across the western U.S. Addressing this real and existential threat in the WUI is of paramount importance to residents and private property owners in Lincoln County. The Fuelbreak CE allows up to 3,000 acres to be treated and we encourage treating as much of the project area as possible.

The documentation also states that forest fuels reduction and fire mitigation is the primary goal of this project. In our observations, fuels reduction treatments that only address small ladder fuels and underbrush do not fully achieve a highly functional and long-lasting fuels reduction and wildfire mitigation benefit. In other words, in as little as five years, the timber stand will have again filled back in with smaller, highly flammable forest fuels. We are encouraged that you plan to commercially thin approximately 1,200 acres to effectively treat the entire forest profile. Reduction of basal area and removal of ladder fuels will be essential to provide optimum fire protection, both in the near-term and the long-term. Additionally, you plan to complete 138 acres of non-commercial fuel

reduction treatments along ten important access roads in the project area. Reducing fuels along all permanent travel routes 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.

In closing, Stimson Lumber Company strongly supports the work you are proposing. We encourage use of the Linear Fuelbreak C.E. and we request that as much of the area be treated as possible, within the guidelines of the C.E. We also urge rapid authorization and implementation of this project. Time is of the essence. The Chief's Wildfire Crisis Strategy called for similar treatments across twenty million acres of federal lands over ten-years and this effort has been slow to materialize. Stimson highly supports fuel reduction treatments on NFS lands adjacent to our private property boundaries and we support a focused and expedited approach to addressing fire hazards within the Wildland Urban Interface on the Kootenai. Stimson stands ready to assist in your efforts where our properties adjoin federal lands. Utilizing partners such as Montana DNRC through the Good Neighbor Authority is also highly recommended to add capacity to the work you are undertaking in this important landscape. We look forward to seeing the full implementation of your proposal and hope to see similar projects soon.

Sincerely,

Barry N. Dexter