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First name: Logan
Last name: Sandman
Organization: MT DNRC
Title: Unit Leader
Comments: Dear Mr. Benson:Thank you for the opportunity to comment on the Supplemental Environmental Assessment for the Ripley Project. The Ripley project area is located east of Libby, Montana in all or portions of Townships 29, 30, and 31 North, Ranges 30 and 31 West P.M.M. in Lincoln County, Montana. The Ripley project area is about 29,180 acres including 18,810 acres of National Forest System (NFS) lands on the Libby Ranger District, Kootenai National Forest, 7,680 acres of private lands and 2,690 acres managed by other federal or state agencies. The project area is identified as a Priority Area for Focused Attention in the 2020 Montana Forest Action Plan due to high risk to uncharacteristic wildfire and insect and disease impacts.Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests in this area and manages state trust lands in the vicinity. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.The Ripley Project is within the Montana DNRC and USFS Shared Stewardship Shared Landscape. Due to the high priority nature of the project, DNRC has dedicated resources through the Good Neighbor Authority (GNA), which will include support for multiple timber sales as well as the potential for additional restoration contracts. This commitment is particularly notable given the significant obstacles the GNA program has absorbed in connection with the Ripley Project. The chronology below illustrates not only the duration of DNRC's involvement and commitment, including costs accrued by the GNA program, but also the substantial support DNRC has maintained throughout:August 2019 - DNRC commented on the original Ripley Project scoping, establishing early investment in the project's success.August 2021 - DNRC awarded the GNA Clay Day Project to Stimson Lumber Co., committing contractor resources and program fundingSeptember 2021 - Alliance for the Wild Rockies v. Gassman, et al., CV-21-105-M-DLC-KLD was filed, introducing litigation risk to the project and associated GNA work.November 2021 - A Preliminary Injunction was granted on the Ripley Project, effectively halting progress and placing the GNA Clay Day Contract in jeopardy.March 2022 - DNRC filed an Amicus Brief and Declarations, demonstrating active legal participation and continued advocacy for the project.September 2022 - Findings and Recommendations on the Ripley Project were issued following a prolonged period of uncertainty for the GNA program.June 2023 - Final Ruling received, concluding nearly two years of litigation that stalled GNA-funded work.December 2023 - Stimson Lumber Co. was released from the GNA Clay Day Contract, representing a direct and tangible loss to the GNA program resulting from the litigation delay.Across more than four years of scoping, litigation, and contract disruption, DNRC's engagement with the Ripley Project has remained consistent and substantive. The GNA program absorbed real programmatic and financial consequences because of this litigation, making DNRC's continued support and renewed commitment to the project a strong testament to the shared stewardship mission and the critical importance of seeing the Ripley Project move forward.DNRC supports the stated Purpose and Need for the project which includes:[bull] Promote resilient vegetation conditions by managing towards the 2015 forest plan desired conditions for species composition, landscape-level vegetation patterns, structure, and patch size.[bull] Reduce the potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions.[bull] Improve big game winter range conditions and promote forage opportunities while maintaining secure habitat for wildlife.[bull] Improve habitat conditions for flammulated owls and other wildlife adapted to open forest structure and drier habitat types.[bull] Provide a safe and efficient transportation system.[bull] Development of motorized and non-motorized recreation opportunities.[bull] Provide a variety of wood products to the American public and contribute to the local economy by generating jobs and income.There is a strong need to manage vegetation to reduce the current high wildfire risk and to improve forest health and increase growth and yield of timber. Current stand structure, composition, and tree density are out of the range of natural conditions and creating conditions of high risk to uncharacteristic wildfire and insect and disease outbreaks.DNRC supports the Proposed Action which includes regeneration harvest (3,223 acres), commercial thin/improvement harvest (7,631 acres), non-commercial treatments (1,544 acres), site preparation and fuels treatments (5,334 acres), 13 miles of new system road construction, and 2 miles of road decommissioning, among other activities as described in Tables 1-

4 of the Supplemental EA.The proposed treatments will reduce wildfire risk and help restore the structure, function, composition, and connectivity of forest terrestrial systems. The project will improve conditions for public and firefighter safety, promote forest health, improve wildlife habitat, and create more resilient watersheds. The project aligns with the goals in the Montana Forest Action Plan (MFAP) which emphasizes actions across boundaries to reduce wildfire risk and improve forest health, and retention of a forest industry in Montana.The treatments proposed with this project should be considered in context of the resource conditions and need for action on all ownerships within the planning area. Treatments on national forest lands will work together with treatments on non-federal lands to significantly reduce wildfire risk and improve forest health. Scheduling and design of treatments on national forest lands should be coordinated with actions on private lands to reduce wildfire risk, protect values, and improve forest health in the planning area.The Montana Department of Natural Resources and Conservation (DNRC) has requested cost-share access to their land at the south end of the project area in T29N R30W Section 16. The proposed action includes this access with the combination of existing roads and the proposed new roads mentioned. The State intends to manage vegetation on the entire 640 acres, with about 355 acres that may potentially include shelterwood or improvement harvest and the remaining approximately 285 acres that may be treated by clearcut with reserves, shelterwood, or seed tree methods.Stands in the WUI, particularly near property, should be thinned enough for fire to drop to the ground and provide safe conditions for firefighter engagement. This may result in wider spacing and more openings than what is prescribed for other management objectives.A key strategy found both in the Montana Forest Action Plan (2020) and Montana Climate Solutions Plan (2020) is to implement active management across ownership boundaries to reduce wildfire risk and sustain healthy forests and watershed function. Studies in the western U.S. are showing that treatments to reduce wildfire risk and improve forest health can reduce carbon initially but increase carbon in the long term. Healthy, vigorous forests capture carbon rapidly, in great capacity and for long periods of time storing it in tree stems, leaves, branches, roots, and soil. Also, wood harvested and developed into durable products are reservoirs of long-term carbon storage.DNRC strongly supports moving the authorized activities identified in the 2021 Decision Notice forward to implementation. We are concerned that the balance of treatments may be modified prior to final implementation. If changes are requested by another party and the final decision differs substantively from the selected alternative, the outcome may not adequately reduce wildfire risk or balance multiple benefits. We intend to use this comment opportunity to support the treatments identified in the selected alternative, help address any remaining issues of uncertainty, and strengthen the project record. DNRC formally requests to be included as an interested party in any further review or resolution discussions for this project. This project, along with treatments on state and private lands, is crucial to meeting our mutual goals of improving forest conditions across ownerships in this landscape.DNRC is committed to continuing a positive working relationship with Kootenai National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By working together, we can more effectively work towards an all-lands approach to forest management and restoration, benefiting both agencies' missions.Sincerely,