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October 5, 2026

Ben Burr, Executive Director
800 W Main St, Suite 1460
Boise, ID 83702

Nathan Gassmann, District Ranger
Libby Ranger District, Kootenai National Forest
12557 Highway 37
Libby, MT 59923

Re: Swamped Project (#58810) – Draft Environmental Assessment and Draft Finding of No Significant Impact

Dear District Ranger Gassmann:

BlueRibbon Coalition (BRC) is writing to provide comments on the Swamped Project. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the U.S. Forest Service. Many of our members and supporters live in Montana or travel across the country to visit Montana and use motorized vehicles to access National Forest System lands throughout the state. BRC members visit these areas for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, water sports, and other similar pursuits. We would like to add our support to any comment submitted by any other individuals or organizations that advocate for motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Support for Active Management

BRC supports the Swamped Project and encourages the Forest Service to finalize the Environmental Assessment and issue the Finding of No Significant Impact. The project area covers approximately

19,255 acres south of Libby, of which 13,525 acres are National Forest System land, and the Forest Service proposes initial treatment of 8,569 acres through 6,883 acres of commercial harvest and 1,687 acres of pre-commercial thinning, slashing, and ecosystem burning. More than 7,870 acres of those treatments, about 91 percent, lie within the wildland urban interface along U.S. Highway 2 and the residences near it. The EA documents a landscape that has not burned in over a century, with Douglas-fir crowding out ponderosa pine and western larch, root disease and bark beetle activity, and ladder fuels that make crown fire the realistic outcome of the next ignition. Treating these stands is a proportionate response to those conditions.

We appreciate that the District is using the emergency authority under Section 40807 of the Infrastructure Investment and Jobs Act to move this work forward. We also support the harvest program on the full 6,883 acres, including the regeneration harvests that create openings over 40 acres. Timber sales from these treatments provide local jobs and revenue in Lincoln County and fund the roadwork, Knutson-Vandenberg restoration, and recreation improvements that BRC members use. Executive Order 13855 (Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk) and Executive Order 14225 (Immediate Expansion of American Timber Production) both direct agencies to increase active management and timber production on federal forests, and this project does so.

Wildfire and Public Health

Habitat loss is the largest threat to wildlife, and wildfire is the largest threat to habitat. We support the Forest Service in properly managing the forest to prevent wildfires that harm wildlife, watersheds, and communities. Many conservation groups actively litigate forest projects that help mitigate fire, and the best protection for habitat is active management carried out without delay. Roads are a critical component of that management. They provide access to carry out forest management projects, give firefighters and the public a route for safe evacuation, and act as a fuel break. The EA itself recognizes that the fuel reduction would support suppression operations along Forest Road 2253 and near residences along Big Beaver Creek Road and White Pine Creek Road, and these roads are the same ones motorized recreationists use.

The project includes ecosystem burns and underburning on roughly 95 acres and more than 1,600 acres, respectively. If a prescribed burn escapes or a wildfire starts within or near a burn unit, it should be treated as a wildfire and suppressed with urgency rather than managed to meet burn objectives. We also ask that the final EA reconcile the underburn acreage, which the narrative on page 17 gives as approximately 1,030 acres and Table 4 gives as 820 acres, and that it correct the broken cross-reference on page 15 and the table references in the road storage discussion on page 22. Smoke

from wildfire carries well-documented risks to public health, and the short-term smoke from planned, permitted burning under the Clean Air Act is the lesser exposure.

Roads and Trails

Well-maintained system roads are the backbone of motorized recreation on the Libby Ranger District. The project proposes reconstruction or maintenance on 78.5 miles of haul road, including 31.5 miles open to the public today, 4.6 miles of temporary road, and 10.8 miles of new system road. BRC supports this work and the Best Management Practices that come with it, because a haul-road reconstruction paid for by a timber sale is often the only realistic opportunity a route gets for meaningful upkeep. At the same time, the transportation proposal also stores 39.5 miles of road, decommissions 3.7 miles, and changes public access on 5.7 miles. We ask the Forest Service to do the following in the final decision:

- Quantify the net change in public motorized access. The EA states that the miles of road open to public motorized use would increase overall, while also stating that total motorized route miles would fall in the Fisher BORZ. The final EA should state the miles of road open yearlong, open seasonally, and closed before and after the project so the public can see which statement controls. BRC overwhelmingly supports new and increased mileage open to the public.
- Reconsider the seasonal and yearlong restrictions in Table 15. Roads 4772 (1.1 miles) and 4772E (0.1 miles) would go from yearlong open to closed October 15 through June 30, Road 6752 (1.9 miles) would go from a December 1 through April 30 restriction to October 15 through June 30, and Roads 6752A and 14502 (0.7 miles) would become yearlong gated with no snow vehicles. An October 15 start closes these roads during the general big game hunting season, which is a primary use for our members, and the “no snow vehicles” designation removes over-snow access that is not tied to any stated resource concern. We ask the Forest Service to identify the specific wildlife or soil data supporting each restriction, to use the shortest closure period that meets the Forest Plan wildlife security guideline (FW-GDL-WL-10), and to consider time-of-year or monitoring-based alternatives before imposing permanent closures.
- Support the seasonal opening of the first 1.9 miles of Road 4772B from July 1 through November 30, and keep that opening in the final decision.
- Convert rather than block stored roads where the use is compatible. Of the 39.5 miles proposed for storage, 9.2 miles are brand new construction (Table 9), 14.3 miles are existing system roads (Table 10), and 3.4 miles are undetermined roads that would be added to the system and immediately stored. Where a stored road does not conflict with a documented

resource concern, the Forest Service should evaluate managing it as a motorized trail for OHVs and motorcycles. Roads built with project funds should not be closed on the day they are completed without that analysis.

- Avoid decommissioning system roads. Roads 14521, 5173, and 5318 (0.8 miles) are proposed for decommissioning, and Road 5318 would receive Level 3 treatment. Storage keeps the road on the system for future management and fire access at a fraction of the cost, and BRC opposes decommissioning wherever storage achieves the same watershed objective. For the 2.9 miles of undetermined roads proposed for decommissioning, the Forest Service should first consider whether any would serve as OHV trail or dispersed camping access.
- Make the public firewood opportunity recurring. The 14.8 miles in Table 16 would be available once, between June 1 and July 31, within one season of harvest completion, with no guarantee that any given road remains in the final decision. We support the concept and ask that the final decision commit to the full list in Table 16, that the window be extended through the fall, and that roads be opened for firewood in subsequent years where use shows no resource problem.
- Limit temporary gates and closures during operations. Gates and barriers installed for haul routes, new system roads, and temporary roads should be removed promptly when project work ends, and affected routes should be signed and announced in advance.
- Prioritize the Knutson-Vandenberg recreation improvements in Table 17: trail signs and carsonite markers, trailhead parking, and rehabilitation of trails where needed. Dispersed sites, parking areas, and trails disturbed by operations should be restored to pre-action condition as Appendix C provides, and access to the Fisher Divide Trail #5 and Leckrone Creek Trail #123 trailheads should stay open during operations to the extent safety allows.

We commend the Forest Service for working on the transportation system in the same project that treats the vegetation. Roads provide access to emergency response, support continued maintenance access, and serve as a natural fire barrier. We strongly discourage closing or decommissioning any road that can be maintained to serve both management and recreation.

Dispersed Camping

BRC believes that all users can and should be accommodated. Camping has grown immensely since 2019, and the number of people who use public land to camp grows every year. The Forest Service should provide as many dispersed camping opportunities as possible so that use is not concentrated in limited sites. Management strategies such as signage, education, and better waste facilities should be exhausted before restrictions or closures of any area or route that provides camping access. We are

concerned that closing dispersed camping options will eventually lead to reservation systems, which disadvantage users who cannot plan far in advance. We support dispersed camping and believe it provides a valuable user experience that the Forest Service should protect. Many visitors prefer to find their own secluded place in the forest, and the roads that this project reconstructs, stores, and gates are often the only way to reach those places.

EXPLORE Act and Multiple Use

Congress directed federal land managers to expand and enhance outdoor recreation opportunities in the EXPLORE Act (Pub. L. 118-234). Public land management actions should not reduce route networks or restrict recreation unless absolutely necessary, and they should work to expand access consistent with that direction. The Swamped Project is a good opportunity to meet the Act's goals by maintaining a sustainable route network alongside active forest management. The Forest Service should also manage for multiple use by providing equivalent opportunities elsewhere in the project area wherever a road or area is closed to one user group.

Conclusion

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to BlueRibbon Coalition, 800 W Main St, Suite 1460, Boise, ID 83702, or to brc@blueribboncoalition.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Burr', with a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin', with a stylized, cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition