



April 28, 2022

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804
Via email: appeals-northern-regional-office@usda.gov

Re: South Yaak Fire Salvage Draft Decision Notice, Finding of No Significant Impact, and Environmental Assessment

Dear Reviewing Officer:

The Yaak Valley Forest Council ("YVFC") hereby submits these objections to the Kootenai National Forest's Draft Record of Decision (ROD), Finding of No Significant Impact (FONSI), and Environmental Assessment (EA) for the South Yaak Fire Salvage Project.

Project Objected To:

YVFC objects to the following: South Yaak Fire Salvage Project, Three Rivers Ranger District, Lincoln County, Montana

Timeliness:

These objections are timely filed. Notice of the draft ROD and FONSI was published in the Missoulian on April 1, 2022.

Lead Objector:

Rick Bass
Executive Director
Yaak Valley Forest Council
11896 Yaak River Road
Troy MT 59935
406-295-9736

Project Proposal Objections:

- The South Yaak Fire Salvage Environmental Assessment, Draft Decision Notice, and Finding of No Significant Impact (FONSI) fails to address significant public concerns

The Yaak Valley Forest Council has many concerns with the action as it has been proposed. These concerns include: the likelihood of significant negative effects on grizzly bears, amphibians, songbirds, and other sensitive and protected fish, wildlife, and plant species, compounded ecological consequences of clearcutting, interference with intact old-growth stands (inventoried or uninventoried) and evident pursuit of timber in mature forests, failure to acknowledge or address the compounding effects of “stacking” regeneration harvest units and project areas, failure to monitor and treat weeds, failure to consider aridifying effects of proposed treatments, failure to adequately provide information quantifying watershed degradation, soil disturbances, mycorrhizae health/function, and potential for increasing road-hunting. YVFC supports proposals that will keep fire where fire belongs, away from homes/structures, and likewise keep water where it needs to be. YVFC requests that the Three Rivers Ranger District pays diligent attention to these important and numerous concerns and gives the necessary ‘hard look’ to address these concerns.

This project is focused on recovering natural resources at the expense of the landscape. This proposal will not benefit the ecological integrity of this area. The areas proposed for harvest were intentionally left during the O’Brien, Lower Yaak (OLY) project planning and implementation. According to the USFS OLY project prescriptions, these OLY units were laid-out and implemented to ‘replicate’ natural wildfire patterns. The South Yaak wildfire accomplished what the Forest Service is attempting to emulate. The USFS approach is to now turn a natural, mixed intensity burn into a clearcut with reserves, like the many within and surrounding this project area. The dead woody material, if left, would retain moisture and provide shade while the next generation of trees, shrubs, and plants establish. The dead woody material, if left, would provide much-needed structural stability to the soil, providing enough time for the natural process to take place and avoid a potential mass-failure or other unconsidered impacts from a hurried salvage sale. Soil disturbance at one of the most critical and vulnerable periods in the life of soil likewise seems to be unconsidered in this proposal. Clearcutting, either as part of a planned timber project or implemented during fire suppression, can have a multitude of effects on soils including compaction, leaching of nutrients, effects on soil and soil water pH, and capacity for soils to support healthy forest regeneration¹²³.

Retention of naturally-occurring remaining snags, both down and standing, would also provide habitat for the black backed woodpecker, listed as a sensitive species on the KNF that is highly dependent on outbreaks of boring beetle populations following a wildfire. The Black Ram EA identifies salvage logging as a “key stressor” on this species.

¹ Zetterberg, T., Löfgren, S., 2010. Acidification effects in forest soils, soil water, groundwater and stream water following clear-cutting and aboveground biomass removal.

² Zetterberg, T., Olsson, B., 2011. Long-term effects of clearcutting and biomass removal on soil water chemistry at three coniferous sites in Sweden. Swedish Environmental Research Institute, report B 1959.

³ Page-Dumroese, D., Jurgensen, M.F., Harvey, A.E., 2003. Fire and Fire Suppression Impacts on Forest Soil Carbon. CRC Press Boca Raton, FL.

Use of clearcutting and high tree-removal harvesting to reduce fuels biomass is not an ecologically viable strategy for offsetting wildfire severity.⁴

Cool-moist microsites throughout the project area must be protected as fire-refugia habitat in the face of climate change, as should old-growth stands. The better we understand how these cool-moist sites are being considered in the overall landscape assessment to address climate change, the more effectively we can continue to work with the ID team to create a plan that reflects and creates overall forest resiliency while protecting and enhancing the wild qualities of this landscape. The large DBH western-redcedar (between Skinner Lake and Kilbrennan Lake) marked with blue-paint for cutting, can not justifiably be cut. This location is a fully-functioning, thriving wetland. This forest provides an ideal nesting habitat for Pileated woodpeckers, owls, etc. Standing water throughout the area provides the necessary habitat for semi-aquatic species, such as Coeur d'Alene salamanders, during critical times of the year. Further analysis is required to document the presence of these fragile species.

YVFC has continually voiced concerns about “significant and rapid... post-harvest disturbed unit [propagation] by weeds,” and asked about efforts to mitigate and restore areas impacted by noxious weeds. Despite USFS Three Rivers Ranger District assurances, all evidence indicates that the proposed actions would aggravate the spread of invasive weeds throughout the project area. The proposed actions will promote increased traffic of machinery and trucks from “major travel routes” into previously isolated forest stands via new, reopened, or rarely-used Forest Service roads, introducing vectors for weed proliferation. The Forest Service’s lack of remedy indicates that the actions are insufficient to prevent the spread of noxious weeds.

A continued concern that has yet to be addressed: the stacking of units upon units and projects upon projects. The salvage project being proposed is located within the newly-cut 67,500 acre OLY project area, it is neighboring the 56,009 acre Knotty Pine project to the West and the 56,000 acre Buckhorn project area to the North. The District and project documents do not discuss how this creates a cumulative effect, one that should have been analyzed. Combined, this salvage project, the Buckhorn, O’Brien Lower Yaak (OLY), proposed Black Ram and Knotty Pine projects comprise more than 243,000 acres across the District. The cumulative effects of these stacked projects needs evaluation. The effective stacking of projects in a connected chain is particularly concerning because of potential impacts to sensitive species, such as grizzly bears, with regeneration cuts atop past harvests and roads in a landscape already impoverished of hiding and thermal cover. This is particularly evident on the cool north slopes utilized for summer thermoregulation, and further disrupts connectivity- not just east-west throughout the Yaak, but from and to Canada’s adjacent Purcell Mountains. Again, have these compounding effects been considered? If so, how?

YVFC asks the agency to carefully consider these concerns and the effects of what is being proposed. Constructing a project proposal with the main-driving goal being to recover the economic value of forest products and to avoid loss of commodity is a very short-sighted objective. YVFC will remain involved with this project and others on the Kootenai, offering additional site-specific/project-specific comments.

⁴ Zald, H.S.J., Dunn, C.J., 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. *Ecological Applications* 28, 1068-1080.

YVFC will not support projects that adversely affect proposed/threatened/endangered and sensitive plant/animal species, or projects that do not work to improve landscape health as the primary objective.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Bass". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rick Bass
Executive Director
Yaak Valley Forest Council