



October 5, 2026

Swamped Project
Libby Ranger District
12557 MT Hwy 37
Libby, MT 59923

Submitted through Comment Analysis and Response Application (CARA):

<https://www.fs.usda.gov/r01/kootenai/projects/308230>

RE: Swamped EA/FONSI

I am writing on behalf of the Yaak Valley Forest Council to offer comment on the Swamped Environmental Assessment Document.

The Yaak Valley Forest Council, established in 1997, implements conservation and restoration programs focused on protecting and preserving critical wildlife habitat for the sensitive, threatened, and endangered species inhabiting the wild Yaak.

The stated Purpose and Need for treatment relies on the assumption that intensive vegetation management, road construction, and timber production are necessary to restore ecological resilience and protect communities from wildfire. However, the proposed treatments may produce effects that conflict with those objectives and lack site-specific evidence.

The growing threat to lives, homes, communities, and infrastructure is not a fuels problem; it is a climate problem. Climate change is altering regional temperature and moisture regimes. Studies¹ show that treating within the home ignition zone—treating forests near structures and hardening homes using FireWise² protocols — is the best way to protect communities. The proposed action will take place only on USFS lands and will thus not treat within the home ignition zone.

Reducing tree density across the landscape does not necessarily increase resistance or resilience to insects, disease, or wildfire. Forest ecosystems are naturally variable, and dense stands, multilayered canopies, and older trees can provide important habitat, soil protection, microclimate regulation, and structural diversity. Broad, uniform thinning will modify and

¹ Cohen, J. PhD; Research Physical Scientist; US Forest Service, retired, (n.d.). *A More Effective Approach for Preventing Wildland-Urban Fire Disasters*. SBCC. Retrieved October 28, 2025, from <https://sbcc.wa.gov/sites/default/files/2023-11/WU%20Fire-effective%20approach.pdf>

² Firewise USA®. (n.d.). NFPA | The National Fire Protection Association. Retrieved October 28, 2025, from <https://www.nfpa.org/education-and-research/wildfire/firewise-usa>

simplify stand structure, fragment habitat, and favor drought-tolerant or shade-intolerant species at the expense of species and conditions naturally associated with the site. Promoting ponderosa pine and western larch should not override the composition expected under the project area's actual ecological setting.

The premise that hazardous fuels must be broadly reduced to prevent high-intensity wildfire overstates the effectiveness of mechanical treatments. Weather, topography, drought, and wind—all consequences of our changing climate—strongly influence wildfire behavior.

During extreme fire conditions, treated areas may not significantly alter fire behavior, particularly if treatments leave slash, regenerate dense understory vegetation, or fail to address landscape-scale continuity.

Mechanical treatments also disturb soils, spread invasive species, damage residual trees, and create short-term fuel hazards. Prescribed fire may be beneficial in carefully selected locations, but its use should be based on clear ecological and safety criteria rather than treated as an automatic remedy.

The proposal's wildlife objectives are contradictory. Creating early-seral vegetation and increasing forage may benefit some big-game species, but extensive canopy removal, road construction, and increased human access reduce secure winter range. Roads increase hunting pressure, wildlife displacement, vehicle collisions, and habitat fragmentation. Access management commitments should be specific, enforceable, and implemented before or at the same time as vegetation treatments, not deferred until after new roads and logging have altered habitat conditions.

The proposed transportation changes also warrant closer scrutiny. The Project proposes the reconstruction and maintenance of 10.8 miles of new road. While these roads will remain closed to the public, there will be an increase in motorized route density.

Expanding the road network increases opportunities for human-caused ignitions and creates additional infrastructure that must be maintained and managed. Research indicates that human-caused wildfire ignitions are strongly associated with roads and human access. In fact, human-caused wildfire ignitions account for 84% of all wildfires and 44% of the total area burned.³ Wildfire ignitions were least common in designated Wilderness areas and Inventoried Roadless Areas.⁴

Roads are strongly associated with the spread of invasive plant species that provide highly flammable vegetation along dry roadsides, where human-caused ignitions are frequent.⁵ One analysis of fires between 1992 and 2024 found that wildfires were four times as likely to start in

³ Balch, J.K., Bradley, B.A., Abatzoglou, J.T., Nagy, R.C., Fusco, E.J., Mahood, A.L., 2017. Human-started wildfires expand the fire niche across the United States. *Proc. Natl. Acad. Sci. USA* 114, 2946–2951. <https://doi.org/10.1073/pnas.1617394114>.

⁴ Aplet, G.H., Hartger, P., Dietz, M.S., 2026. Three-decade record of contiguous-U.S. National Forest wildfires indicates increased density of ignitions near roads. *Fire Ecology*. 22, 8. <https://doi.org/10.1186/s42408-026-00450-2>.

⁵ Healey, S.P., 2020. Long-term forest health implications of roadlessness. *Environ. Res. Lett.* 15, 104023. <https://doi.org/10.1088/1748-9326/aba031>

areas with roads as in roadless forest areas, while other research has found that more than 90 percent of wildfires occur within a half mile of a road.⁶

New road construction and road reconstruction will likely increase sediment delivery to streams, disrupt drainage patterns, fragment wildlife habitat, and facilitate unauthorized access—a chronic problem in the Kootenai. Roads remain on the landscape even when described as temporary or intermittent. The agency should demonstrate that each road is necessary, identify its full economic and environmental costs, and provide binding schedules and funding for maintenance, storage, or decommissioning.

Maintaining old-growth character cannot be reconciled automatically with treatments that remove trees, alter canopy structure, or increase disturbance. Existing old growth should be managed first through protection, monitoring, and prevention of additional fragmentation. Treatments within or adjacent to old-growth stands should be limited to actions demonstrably necessary to address a specific threat and should preserve large trees, snags, downed wood, canopy continuity, and the ecological processes that define old-growth conditions.

Finally, the objective of providing timber and supporting the local economy should not be presented as proof that the proposed treatments are ecologically necessary. Timber production may provide short-term jobs and revenue, but those benefits must be weighed against treatment costs, road construction and maintenance expenses, lost recreation value, reduced habitat quality, and the risk that ecological objectives become secondary to commercial volume. Economic benefits should be evaluated transparently and compared with lower-impact alternatives.

A more precautionary approach would protect existing old growth, limit treatments to areas with demonstrated, site-specific risks, prioritize defensible space near private property, use prescribed fire where appropriate, close or decommission unnecessary roads, and monitor outcomes before expanding treatment acreage. The agency should also compare the proposal with alternatives involving no commercial harvest, smaller and strategically located treatments, fewer roads, and stronger access controls. Without that analysis, the project's claims of improving resilience, wildlife habitat, fire behavior, and public safety remain assumptions rather than demonstrated needs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chris Bachman', followed by a horizontal line.

Chris Bachman
Conservation Director
Yaak Valley Forest Council

⁶ Aplet, G.H., Hartger, P., Dietz, M.S., 2026. Three-decade record of contiguous-U.S. National Forest wildfires indicates increased density of ignitions near roads. *Fire Ecology*. 22, 8. <https://doi.org/10.1186/s42408-026-00450-2>.