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Comments: Please see and consider my attached comments on Black Ram Project in the Yaak Valley on the Kootenai National Forest in Montana.

[ldquo]Here is your country. Cherish these natural wonders, cherish the natural resources, cherish the history and romance as a sacred heritage, for your children and your children's children. Do not let selfish men or greedy interests skin your country of its beauty, its riches or its romance.[rdquo] ~ Theodore Roosevelt

Stop Black Ram Project [ndash]> Protect Ancient Forests in Yaak River Valley, Kootenai National Forest (KNF), Montana

The Yaak is Montana's Rainforest, where continental weather patterns collide as colder and drier Rocky Mountain ecosystems meet a steady onslaught of storms and moisture from the Pacific Ocean. The resulting high-precipitation, high number of cloudy days, and deep winter snowpack create a [ldquo]modified Pacific maritime[rdquo] climate that supports pockets of rare inland-temperate rainforest, parts of the landscape uniquely resilient to climate change called [ldquo]climate refugia[rdquo]. These climate refugia can serve an invaluable function of helping repopulate once we moderate or reverse global warming, many years from now.

Climate change imperils the forests that could save us. As average temperatures rise, the Yaak is rapidly transitioning from a snow-based to rain-based climate. Shifting precipitation patterns are impacting the volume and timing of watershed flow and increasing the frequency of drought-dependent forest diseases, insect outbreaks, and wildfire. These effects are exacerbated by continuing unchecked logging and roadbuilding that speeds up desertification, the drying out of the surrounding area. For years, the Yaak has given up more timber than any other valley in Montana; it is one of the last wild and biologically diverse landscapes in the Lower 48; it is past time for the Yaak's last remaining roadless areas and mature, old growth rainforest to receive protection for our future.

We live in a society based on excessive, rapacious capitalism and self-centered consumerism that views natural resources as property to be liquidated. The window of opportunity is closing, rapidly, as we face climate change head on and bear witness to ecological destruction, environmental crisis and mass wildlife extinctions. Forest management must be based on science and best practices, with responsibility to respect complex ecosystems to apply innovative management practices for the long term, not old business as usual models for short term profit.

Black Ram, like many timber sales on other national forests, is the result of a purely political mandate to increase logging on public lands by 40%, ushered in during the previous administration that denied climate change, promoted coal mining and oil drilling, blocked renewable energy development, and rolled back policies and regulations to make it easier to liquidate natural resources including old growth forests, and to continue burning fossil fuels.

Black Ram Project, the Proposed Action, Alternative 2: would take roughly 60 million board feet out of this northern tier of Montana, total project area of around 95,000 acres; would involve 2,011 acres of clearcuts (36 units would contribute to 21 openings over 40 acres, the largest of these openings would be approximately 293 acres, or nearly a half square mile); 4,038 acres of total commercial logging, 2600 acres of [ldquo]regeneration harvests[rdquo] (which will remove between 80-100% of the canopy); 1363 acres in old growth, 7,553 acres of fuel treatments outside logged areas, including 2,199 acres in inventoried roadless areas; 0.8 miles of road construction in old growth forest; and 90.3 miles of road reconstruction or maintenance; would take place atop the source of the Yaak River, headwaters for wildlife and the drinking water for communities.

The KNF falsely claims that logging in old growth rainforest will curtail fire risk, maintain or improve resilience to drought, insects and disease, maintain or improve old growth character, and restore historic forest conditions. The majority of logging proposed in the agency's proposed action would occur many miles from private property, and so will do little to protect communities from fire. The KNF must prioritize the harvesting of trees in Wildland-Urban Interface near the towns of Libby and Troy. Continue to harvest small diameter trees along the infrastructure of existing roads. Establish corridors of connectivity so that roadless areas continue to serve as reservoirs of wildness and biodiversity of the rare, sensitive, threatened and endangered species living in the Yaak and other mature forests.

No place is more representative of ecosystem stability, resilience, and historic forest conditions than old growth in the Yaak; old growth in which no fire scars or sign of harvest can be found, dating back at least a thousand years. Old spruce and subalpine forests in boreal regions, like those in the Yaak, hold up to 80% more carbon than other forests, according to Canadian forester and ecologist Dr. Herb Hammond. Ancient forest in the Yaak is rare habitat dominated by 600 to 800 year old Cedar, Hemlock, Larch decaying into a rich and decadent humus, rendering critical sub-boreal habitat that retains moisture in wetlands, bogs, and fens. These magical forests hold the key to surviving climate change across the ages, and should be preserved for research, not erased from the public and scientific treasury.

Roads, regardless of gated or stored status, are the main threat to grizzly bears by greatly increasing opportunities for human-bear conflicts, habitat fragmentation, displacement, vehicle strikes, and poaching. From 1982-2018, 73% of grizzly bear mortalities in the Cabinet-Yaak ecosystem were human-caused. Black Ram includes bulldozing a mile of new, permanent road through old forest and reconstructing or maintaining 90.3 miles of road, including twenty-eight miles of the Pacific Northwest National Scenic Trail. Unsustainable logging across the Canadian border already jeopardizes habitat connectivity. In March, the U.S. Fish and Wildlife Service's 5-year grizzly bear status review confirmed that of the six grizzly bear recovery ecosystems, only the Cabinet-Yaak "resiliency" is "low." Yaak grizzlies fare the worst of any population. No EIS was conducted to study project cumulative effects on the very vulnerable twenty-five endangered grizzly bears who live in the Yaak.

The Yaak is home to more than a quarter of all Montana species of concern, including one of five subpopulations of grizzly bears left in the state. Lynx remain threatened in the lower 48 states and their recovery remains questionable, largely due to uncertainties of climate change. One of the few reproducing lynx populations found in the lower 48 inhabit the Yaak drainage on the KNF. The Yaak is ideally situated as a remote climate refuge and migratory stepping stone in a mountainous corridor system that runs north from the Greater Yellowstone Ecosystem through the Cabinet Mountain Wilderness to the Canadian Purcells all the way up toward the Yukon. The Yaak is a vital habitat connector and the narrowest passage in this chain of wildness. The Yaak is also at a crossroads that links east with west, at nearly one million acres due north of the Kootenai River, it uniquely conjoins the Pacific Northwest maritime weather systems and their associated species, with the glaciated mountainscape of the Northern Rockies, and their species.

The Yaak acts as a refuge for a broad array of climate-sensitive species reliant on intact mature forests, ephemeral-water sources, and a topographically diverse ecosystem unique to this valley. Westslope cutthroat trout populations are at risk from stream sedimentation, stream barriers to migratory corridors, warming stream temperatures, and hybridization. Western toad life cycles require over-ridge habitat corridors that need special consideration when planning for timber harvest. Northern Alligator lizards are unique, moisture and cool-temperature-adapted reptiles found in the Yaak. An English sundew population in the Yaak is one of only two dozen known in Montana and requires untrampled peat mats to prosper and is under threat from clearcutting proposed in Black Ram. Salvage logging and clearcutting in the wild Yaak reduces habitat for the pileated woodpecker, cavity-nesting owls and other bird species. Pika are particularly susceptible to climate change and population fragmentation. Yaak populations of Pika require conservation of cool peak-to-peak migratory routes.

Alternate Paradigm for our long term future: the Yaak Valley Forest Council [ldquo]Climate Refuge Program[rdquo] seeks to identify, protect, and restore the landscape and species of the Yaak that are sensitive and uniquely resilient to the effects of climate change. Supporters believe the wild and climate-resilient Yaak is a strong candidate for the recently announced effort by the Biden Administration to conserve 30% of America[rsquo]s land by 2030. 117th Congress (2021-2022) House Resolution 69 - Expressing the need for the Federal Government to establish a national biodiversity strategy for protecting biodiversity for current and future generations, has 43 co-sponsors.

Black Ram is in conflict with the will of the people and Biden[rsquo]s executive order to preserve the most biologically rich ecosystems to slow the wildlife extinction crisis and curb global warming. Now is the time to place a moratorium on logging in old growth on public lands. Black Ram Project will worsen climate emissions by bulldozing nearly a mile of road through old-growth habitat, logging nearly a square mile of old growth forest, decrease the ability of hundreds more acres of forest to sequester carbon, and threaten already endangered and sensitive species.

Stop Black Ram and require the Kootenai National Forest to take the right action for our future. The governor of Montana recently announced that Montana will not participate in the goal of protecting 30% by 2030.

Sincerely with great concern,

Susan Hillstrom