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Organization:

Title:

Comments: November 6th, 2025

Re: Montana Department of Natural Resources and Conservation, Comments on the Upper Bunk Project
Proposed Action

Dear Mr. Hernandez:

Thank you for the opportunity to comment on the proposed action for the Upper Bunk Project. The project is located east and northeast of Yaak, MT, along the Yaak River Road. The project area includes 10,747 acres and includes national forest and private lands. Proposed treatments would only occur on national forest lands. The project area is entirely within the Wildland Urban Interface (WUI). Private residences are adjacent to the project area and along the proposed haul route. There are powerlines within and adjacent to the project area which add to the risk of ignitions and potential damage in this area.

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 impacts. Lincoln County declared a county-wide emergency in 2022 due to the extreme risk of wildfire and insect and disease impacts.

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.

DNRC supports the stated Purpose and Need for the project which includes:

1. Manage stands to increase forest health and resilience to future drought conditions, insect and disease hazards, and wildfire.
2. Produce forest products to contribute to the economic sustainability of local economies.

There is a strong need to take action to reduce the high wildfire risk and improve forest health in the project area. Current stand structure, composition, and tree density are out of the range of natural conditions and are contributing to increasing risk of impacts from uncharacteristic wildfire and insect and disease outbreaks. The proximity of stands to residences and access roads amplifies the urgency to take action to reduce risk to people and property in this area.

DNRC supports the Proposed Action which includes commercial (harvest) treatments on 2,160 acres and non-commercial (non-harvest) treatments on 501 acres. The proposed treatments will reduce wildfire risk and help restore the structure, function, composition, and connectivity of forest terrestrial and riparian systems. DNRC supports the proposed intermediate treatments in old growth with the planned design to retain large, older trees, decrease the number of small trees, and reintroduce fire.

The proposed treatments 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 which emphasizes actions across boundaries to reduce wildfire risk and improve forest health, and retention of a forest industry in Montana. Stands in the WUI, particularly near property, should be open 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.

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.

Due to the high priority nature of the project, the DNRC encourages the district to utilize dedicated Good Neighbor Authority (GNA) resources in the area to add capacity for implementation of commercial treatments and restoration work.

We appreciate that the District has worked collaboratively with the Kootenai Forest Stakeholders Collaborative and Lincoln County FireSafe on development of this project.

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,

Logan Sandman, Unit Manager

Libby Unit Office