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Comments:

November 6, 2025

Yaak Valley Forest Council

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Troy, Montana 59935

Kootenai National Forest

Attn: Nikia Hernandez

District Ranger

Three Rivers Ranger District

12858 US HWY 2

Troy, MT 59935

RE: Upper Bunk Fuels Reduction Project

I am writing on behalf of the Yaak Valley Forest Council (YVFC) and Center for Biological Diversity to offer comment on the Upper Bunk Fuels Reduction Project Public Notification 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.

We appreciate the opportunity to comment. The public notification document states, "Comments are most helpful when they are within the scope of the proposed action, have a direct relationship to the proposed action, and include supporting reasons for the Responsible Official to consider." This is an impossible target to hit, as the proposed action, as shared with the public, lacks a detailed project description and no verifiable description of forest types or silvicultural prescriptions.

The project document states, "The Three Rivers Ranger District has invited the Kootenai Forest Stakeholders Collaborative and the Lincoln County FireSafe Council to collaborate on the Upper Bunk Project."

YVFC reached out to the Kootenai National Forest this past summer when we began noticing painted trees in various old-growth and mature/replacement old-growth forests, and were told we would receive information in the fall. This hardly qualifies as collaboration. Given our centrality as a stakeholder and intimate knowledge of the forest, it would seem arbitrary and capricious, at best, to exclude YVFC.

The Healthy Forests Restoration Act (HFRA Sec.603 Administrative Review (b)(1)(C) states:

(b) COLLABORATIVE RESTORATION PROJECT.-

(1) IN GENERAL.-A project referred to in subsection (a) is a project to carry out forest restoration treatments that-

C) is developed and implemented through a collabo-

rative process that-

- (i) includes multiple interested persons representing diverse interests; and
- (ii)(I) is transparent and nonexclusive; or
- (II) meets the requirements for a resource advisory committee under subsections (c) through (f) of section 205 of the Secure Rural Schools and Community Self-Determination Act of 2000 (16 U.S.C. 7125)

HFRA clearly states that the collaborative process must be transparent and nonexclusive and include multiple interested persons representing diverse interests. This proposal falls short of meeting the legal requirements for collaboration. YVFC has

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. Studies show that treating within the home ignition zone-treating forests near structures and hardening homes using FireWise protocols - is the best way to protect communities and structures. The proposed action will take place only on USFS lands and will thus not treat within the home ignition zone.

The project proposal's purpose and need states, "...the desired forest would contain more tree species that demonstrate the following traits: less susceptibility to insects and disease mortality, more resilience to fire, more tolerance of drought, relatively long-lived, and more productive." These characteristics describe old-growth-adapted forest conditions. We agree that old-growth forests are a desired condition, and forests meeting your purpose and need should be left intact and unhindered in their succession. Preservation of ecological integrity should be the fundamental goal of forest management.

Non-harvest treatments that slash and pile fuels in the forest are increasing wildfire risk and moving away from desired fuel conditions. Likewise, "...slashing, piling, scattering non-merchantable trees and brush or mastication," for harvest treatments concentrates the fuel load on the forest floor, exacerbating fire behavior and increasing the heat and intensity of a ground fire. Reducing ladder fuels can be accomplished by pruning low branches from trees. Excessive understory removals through mastication of groundcover and pile burning of slash can disrupt natural successional pathways.

Leave tree selection that favors early seral forest is counter to the stated purpose and need, as stated, "...the desired forest would contain more tree species that demonstrate the following traits: less susceptibility to insects and disease mortality, more resilience to fire, more tolerance of drought, relatively long-lived, and more productive." Every effort should be made to leave standing and fallen dead trees as shelter and sources of food for wildlife.

It is noted in the Scientific Basis for treating in Old Growth section, "Restoring forest composition and structure before wildfires occur should allow fire to play its characteristic role in maintaining ecosystem structure and function in the forest..." yet this project is "located entirely within the WUI," where, "The growing threat to lives, homes, communities, and infrastructure..." is the greatest. The purpose and need and treatment strategies for this project seem to be at odds.

The Project document states, "The desired result of developing resilient old growth conditions through management technique is to meet restoration objectives while maintaining composition and structure that conforms to the Green et al old growth definition." However, Green et al is clear that the specific attributes that determine old growth vary by forest type. Forest types are not provided for the Proposed Harvest Units, and there is no universal definition of old growth offered in Green et al, as characterized in the Project document, page 9. Restoration objectives outlined and defined in Green et.al. to meet old-growth characteristics are minimum

standards, not desired conditions. The prescriptions envisioned may well meet the directives of the Forest Plan to increase large and old trees on the forest; however, until we see what's being proposed, we can't be certain. And the effects of logging with regard to protecting old growth have been disputed eloquently by Dr. DellaSala, Bradley et al., Zald et al., Lindenmeyer et al. (attached) and others. In general logging creates fire hazard where none previously existed, and the presence of old growth can be more of a fire deterrent than its being logged.

Roads:

The Project proposes the reconstruction and maintenance of 23 miles of road and states, "The Upper Bunk project would use existing gated roads that are currently closed to motorized public travel during the projects implementation." While these roads will remain closed to the public, there will be an increase in motorized route density. There is no indication that the Project complies with the Kootenai National Forest Plan standards. Specifically, there is no indication that the Project complies with the 2011 Forest Service Access Management Amendment in the Project proposal, or how/if the road reconstruction and maintenance will comply with the open motorized route density and total motorized route density restrictions allowed within Bear Management Unit 16. Additionally, illegal road use has been documented in the area. See attached report. However, the USFS does not there is no mention illegal road use and user-created roads in the project area. The Forest must include illegal roads in calculating compliance with the Access Amendment the failure to do so violates the National Forest Management Act.

Wild and Scenic Rivers: Vinal Creek, in the heart of the project area, we observed active springs within heavily-painted regions of the project area, and an apparent focus by tree painters on steep wet north- and north- and northwest-facing slopes.

Pacific Northwest Trail: In addition to currently operating the high-volume PNT without any monitoring system in place, the planning of this CatEx project appears to fail to plan for the fact that portions of Road 746 are actually a part of the Scenic Trails system. In addition to viewshed concerns, the use of the road by PNT hikers should be a concern with the proposed hauling of commercial green timber (not fuels reduction) along this road/hiking path. Dr. David Mattson's studies about the effects of pedestrian traffic on grizzly bears is attached as well, along with others. Other studies are attached including a very relevant one about human-caused mortality, including poaching. At least one recent poaching of a female grizzly occurred in the heart of this proposed project area and our observations and assessments show habitat has become less secure since that time, nor more. Some gated roads have been driven around, or are able to be driven around, and have been and are actively being used by motorized vehicles.

Other sensitive species dependent upon this project area and which would be affected negatively include lynx, goshawk, wolverine, boreal toad, gray wolf, and a great many other species of concern such as great gray owls, flammulated owls, long-toed salamanders, and more. Roadless lands 250 acres and larger are known to supply critical elk security, and portions of the proposed project area have summer as well as winter thermal habitat for ungulates and other large mammals. Fragmentation of old forests is rampant in the area and we are concerned this proposal will not only fail to recover some of that fragmentation but actually increase it.

We don't see how a proper climate or economic analysis-or any kind at all-can be performed/assessed given the absence of specificity in this proposal. We'd like to request a field trip or trips to learn more about what is being considered for these units, and what condition they are. And as ever we remain concerned about road densities in this area, and in adjacent BMUs, into which grizzly bears, including females and females-with-young, would be expected to displace. Pasted below is a link to a recently completed barrier report (compressed) documenting insufficient barriers on roads intended to secure grizzly bear core habitat in BMUs 14 and 15 in the Kootenai National Forest. The attached report is compressed. I have also attached a link to a high-resolution copy of the report that is too large for email. The report addresses YVFC's documented insufficient barriers in the Black Ram area from 2020 to 2024. In 2024, seven new insufficient barriers were identified.

Link to Hi-Res report: https://drive.google.com/file/d/1XeExJj8ybsuGEras-vjqQkFfrk_ZmNGE/view?usp=share_link

Here's a link to other roads we've assessed in the proposed project area:

<https://www.dropbox.com/scl/fi/9jni5n045w6230yc65r5e/2025.10-NE-Yaak-Barrier-Report-with-addendum.pdf?rlkey=ed0f8odj208l4h6zvdx90h4o&st=on4371uu&dl=0>

With regard to cumulative effects and other negative or potentially negative effects of this proposal, we have noted that many of the units painted this year represent exactly or with significant overlap units proposed in the NE Yaak project of 19 years ago. We are attaching the Draft EIS from this project-not that we consider the data therein the best available, but rather, notice that no subsequent analysis of these critical issues has been prepared/exists.

User created roads along Rd. 746 have been reported but not addressed. Yodkin and Beaver Browning Roads have insufficient barriers, as does Zulu, and roads along Burnt Dutch.

We are attaching a map showing roads in the area that we have documented as affecting grizzly bear recovery and other wildlife. The compounding and cumulative effects of this project, along with the proposed seasonality of it (mid-summer, during maximum weed dispersal and soil vulnerability) concern us. We also remain concerned about grizzly bear mortalities and the use of best available science with regard to grizzly recovery and many of these other issues, and look forward to visiting.

13. Upper Bunk Fuels Reduction Project: Public Notification Document. (2025). USDA Forest Service.
<https://www.fs.usda.gov/r01/kootenai/projects/68787> p 9.

14. Upper Bunk Fuels Reduction Project: Public Notification Document. (2025). USDA Forest Service.
<https://www.fs.usda.gov/r01/kootenai/projects/68787> p 9.

15. Green, P., Joy, J., Sirucek, D., Zack, A. A., & Naumann, B. (1992). OLD-GROWTH FOREST TYPES OF THE NORTHERN REGION. Northern Region USDA Forest Service p 12.16. Upper Bunk Fuels Reduction Project: Public Notification Document. (2025). USDA Forest Service.
<https://www.fs.usda.gov/r01/kootenai/projects/68787> p 9.

Respectfully submitted,

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