



Bryan Donner
Tally Lake Ranger District
650 Wolfpack Way
Kalispell, MT 59901

April 18, 2010

Griffin Creek Resource Management Project
Proposed Action Comments

Dear Mr. Donner:

The Flathead Audubon Society has reviewed the March 19, 2010 document describing the Purpose of the Project and Proposed Action for the Griffin Creek Resource Management Project and we wish to submit the following comments.

We are encouraged to see a mix of resource activities appearing in the Purpose and Need and not so narrowly focused on timber and fuels management.

Where will money come from to accomplish fish, wildlife, and watershed proposals and when would they be accomplished? The non timber or fire proposals should be as certain of accomplishment and in the same time frame as the timber and fire management portions of the Proposed Action.

On page 6 under recreation analysis area findings, the area is described as having increasing popularity of motorized off-road vehicles along with accompanying resource damage by illegal use. The Proposed Action should include a plan to specifically address this illegal ORV use and the resource damage.

On page 6 under the first Purpose and Need Statement is about improving forest stand conditions related to Forest Plan objectives for vegetative structure and species composition. There are Forest Plan standards for old growth but nothing is said about old growth's status so the reader cannot know if the Proposed Action should include actions to move toward FP standards or other management actions needed.

Maps indicate that very large openings will be created by individual cutting units and combinations of cutting units. How do these comply with Regional and Forest Plan

standards especially in light of huge openings created by recent wildfires? How do the proposed openings lay in relation to previous timber management and are some of previous cutting units still without hiding cover?

The area is already well roaded and motorized. No new permanent road construction should be seriously considered. How will temporary road construction be rehabilitated? More road decommissioning should be added to improve long-term water quality.

How much water yield recovery has occurred in the recent wildfires and how much will the proposed action harvests contribute to water yields and effects on streams? If the proposed timber harvests would increase water yields to the detriment of streams, then the extent of harvest should be scaled back to allow streams to function with acceptable water yield increases.

Thank you for considering our comments.

Lewis Young
Conservation Chair
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