Flathead Audubon Society
PO Box 9173
Kalispell, MT 59904

To: Project Leader
Robert-Wedge Post-Fire Project

August 9, 2004

Comments on Robert-Wedge Post-Fire Project DEIS from Flathead Audubon Society

Our comments fall in several categories including cavity habitat/snag management; harvest in riparian areas, RHCA's, and other non-timber Forest Plan allocations; potential harvest in old growth; grizzly bear habitat management; access management; and noxious weeds.

Flathead Audubon Society submitted comments during the scoping process as well as participated in the Collaborative Process conducted earlier.

1. Cavity/snag habitat management.

It appears that many of our comments and issues from the Collaborative Process and scoping process were addressed in the DEIS and we are grateful for that. However, there are still concerns with the black-backed woodpecker and snag retention that require further comments.

Black-backed woodpecker: While it appears that black-backed woodpecker habitat has been considered and suitable habitat would be retained in somewhat more than ½ of what was created, the analysis still leaves several questions. What portion of the high quality habitat will be retained versus the moderate quality habitat? In other words, is the salvage harvest concentrated in the high quality black-backed woodpecker habitat, leaving the lesser quality habitat to make the acreage numbers look better?

The statement on page 164 relating to the current amount of habitat being "surplus" to what occurred historically is inaccurate and misleading. The "historical" levels referred to in Hillis *et al.* (2002b) are averages and were mostly created by big fires like the Robert and Wedge fires. Therefore, it is inaccurate to say that a few big fires over the last few years after decades of no big fires have created any surplus habitat.

Snag retention in harvest units: The general approach described for Alternative 2 on page 214 and in Table 62 that would leave a diversity of snag habitats across the landscape is a considerable improvement over previous fire salvage projects. However, there are still several elements that need adjustment. All large ponderosa pine snags should be retained as well as larch and Douglas-fir and the dbh of retained trees should be 18" for larch and ponderosa pine and 20" for Douglas-fir. The large ponderosa pine retention and smaller dbh's are supported by the research and comments previously submitted by Lisa Bate as part of Flathead Audubon's scoping comments.

The reserve patches described in Table 62 need to be specified to be interior patches within the harvest units otherwise they are just part of the surrounding area and don't meet the intent of providing snag habitat "within" harvested areas.

How does a reviewer know how many acres of each snag emphasis level occur and where they occur? The amount of "low snag emphasis" where no snag patches are required is a concern. The proportion of harvest units with "low" snag emphasis level could be better described in the narratives. There was no reference to where the actual numbers could be found, and the only place I noted was in Tables 14 and 15.

2. Harvest in riparian and non-timber allocations

The proposed harvest in non-timber and riparian Forest Plan allocation (MA's 2A, 2B, 3, and 12) were identified as an issue (pages 15-16), but no discussion of the issue was found in the Environmental Consequences for any resource. The only mention noted is on page 34 in the Alternatives Comparison Table. The sentence in the table saying that Project Design Criteria address the resource values is inadequate. Project Design Criteria are basically intended to only partially mitigate or address various resource values and certainly don't explain how harvest would maintain or improve the snag habitat and other amenity values for which the non-timber allocations are supposed to be managed.

The proposed harvest in INFISH riparian buffer zones appears to be limited to some small areas above open roads. If this is indeed the case, then that harvest is probably a moot point because firewood cutters will take the trees even if left after the timber harvest.

3. Old growth

The assumptions concerning the relationship of burn severity to the retention of live trees in pre-fire old growth are generally reasonable. Burn severity certainly plays a major role in the live tree components of old growth characteristics retained after fire.

One concern is the proposed timber harvest in 145 acres in the Robert Fire and 145 acres in the Wedge Fire that may still have enough live tree components left to meet old growth characteristics. These are discussed on pages 110-112 and 125-127. Given the tremendous reduction of old growth due to the fires, anything even remotely resembling old growth should be retained.

Another concern is the ecological value of burned old growth is undervalued by the Forest Service. The burned old growth stands should be the focus for providing for cavity nesting habitat and downed wood habitat yet it appears that burned old growth is targeted for salvage harvest at a disproportionally high rate. Burned old growth stands are most likely to provide high quality habitat for black-backed woodpeckers and other cavity nesting species as well as some of the highest value habitat for species using downed wood if it was allowed to go

unharvested. Any harvesting in burned old growth alters soil conditions and residual plants and microorganisms that may be vital to regrowth of the stand. Salvage harvesting also introduces noxious weeds and potential weed control activities later on. The bark beetle arguments are not adequate justification for harvest of dead or the few remaining live trees in burned old growth.

4. Grizzly bear habitat management

On page 29 in the Project Design Features, a 100' buffer on avalanche chutes is discussed. While the importance of avalanche chutes to grizzly bears is well documented, what is the basis for using only a 100' buffer? Even in green timber which provides much better visual screening, 300' is typically required to provide adequate hiding cover. It very likely would have to be even wider in burned timber.

5. Access management

The "5 year" goals of A19 need to be deleted from narrative because the 5 year period ended in 2000, are no longer applicable, and only confuse the current applicable direction.

"During" project A19 numbers are buried in the narrative of analysis and not even mentioned in the description of Alternative 2. The "during" A19 numbers are equally important as the numbers that may eventually be achieved post-project because the salvage activities elevate road densities and reduce security core from the existing conditions and will maintain these reduced levels of grizzly bear security for several years. The "during" numbers disclose the real effects of conducting the salvage activities and need to be emphasized in the disclosure of effects.

Many harvest units are being called "minor" activities and are not shown to increase road densities and reduce core habitat. Commercial timber harvest at this scale is not "minor." The Flathead Forest's Land and Resource Management Plan Implementation Note #12 is referred to as justification for calling them minor. Reading of the definitions of "major" and "minor" in Note #12 does not support the contention that the proposed harvests would be "minor." Cutting and decking of trees is given as an example of a major activity. In addition, the argument that the proposed harvests would take place in less than 30 days is highly unlikely in my experience, because weather delays, equipment breakdowns, and all the related activities pre-and post harvest such as moving equipment in and out are not accounted for. Although the Flathead Forest has a history of conducting small timber sales and calling them "minor" activities, it is unlikely that the US Fish and Wildlife Service would concur with that interpretation if they were aware of the situation. Even if some of the proposed "minor" activities are individually small and of lesser impacts, there are so many of them in conjunction with larger proposed harvest and restoration activities that they must be included in the cumulative effects.

Helicopter logging in Security Core during the non-denning period is another issue. There is no science basis for saying that it doesn't affect core values. How could helicopter harvest have any different effects on bears than ground-based harvest when cutting the same trees down and flying them out instead of dragging them out with a skidder? These real effects of helicopter logging

need to be reflected in the reduced grizzly bear habitat values shown for effects of harvest. The "environmental" effects are supposed to be disclosed in a DEIS.

How long will it take to reach proposed A19 numbers after harvest? The DEIS is silent on this point and it makes a very big difference whether the road/access management is reached in 3 years, 10 years, or never. See the next paragraph on funding.

How will access management be paid for? This is the same issue as we commented on during the scoping process, but it was not addressed in the DEIS. There is not enough money to go around unless some new funding source is available and dependable. The Moose and Spotted Beetle Projects that are existing firm commitments already consume virtually the entire Flathead Forest road decommissioning budget so where would the money come from to do any work on Robert-Wedge? The Flathead Forest has a history of not achieving access standards even where decisions have been made. Money for access management is a **big deal** for grizzly bear management because the timber harvest is going to occur but the access management for grizzly bears will be put off indefinitely if no money is available. The result will be that the harvest will reduce grizzly bear habitat values for several years wherever harvest occurs but there will be no long term improvement to help offset the direct effect of reductions due to salvage harvest. If the access management is not as much a reality as the salvage, then it is misleading to the public to let them think it's going to happen as described in the DEIS.

What is the rationale for not eventually meeting A19 numbers as required by the Forest Plan? There is no clear explanation. Lower Whale Subunit may have limitations due to required legal access to private lands, but it wasn't well described and it wasn't possible to tell if everything possible was done with the exception of access to the private land. In Canyon-McGinnis Subunit, what rationale is there other than it would be controversial to some people?

Figures 5-8 still show those road changes not yet implemented under previous decisions as part of the existing condition. This is misleading because many of them do not yet exist on the ground even though the decisions have been in existence for many years. This gives the impression that the subunits are closer to Forest Plan Standards than what actually exists on the ground.

It is still not clear from reading the analysis whether the proposed temp roads and old road templates to be reopened were included in the road density/security core calculations. To accurately portray the full effects of the proposed activities, the temp roads and reopened old road templates must be accounted for.

The Lower Whale Subunit is far below Forest Plan Standards for Security Core yet the proposed activities would cut the existing low level in half (page 271) for an undetermined number of years. And this number would be far worse if the real effects of helicopter logging in Security Core were accounted for. As stated earlier, there is no science basis or justification for not reducing Security Core when helicopter logging. For sound grizzly bear management, the salvage and restoration activities should be adjusted to, at a minimum, maintain the existing levels of Security Core during project activities as well as improve it at some future date.

6. **Noxious weeds**

The spread of noxious weeds due to salvage and restoration activities is still a concern. The Flathead Audubon Society strongly recommends incorporation of effective measures to prevent the introduction of noxious weeds during salvage and restoration activities as well as to monitor and treat them in later years.

Lewis Young
Conservation Chair
Flathead Audubon Society