

4/29/05

Tracy Hollingshead
Lost Trail Salvage Project
Sula Ranger District
7338 Highway 93 S.
Sula, MT 59871

Transmitted via email—please acknowledge receipt!

Ms. Hollingshead:

Following are comments by the Native Forest Network on the proposed Lost Trail Salvage project, scoping dated April 5, 2005. Please fully incorporate the comments submitted by the Ecology Center into our letter, as they accurately represent our concerns as well.

Over the past several years, the Bitterroot National Forest (BNF) has exhibited an aggressive salvage, or post disturbance, logging policy across both suitable and unsuitable forest lands on the BNF. The Lost Trail Salvage project is another post disturbance logging project in a series of projects that have focused on removing complexity from natural forests by eliminating the natural results of natural disturbance in forests.

There is no question that the BNF has selectively targeted disturbed areas for industrial logging, largely operating its timber sale program in this manner. It has become predictable, and even expected, not only by the conservation community but also by locals, including those in the logging industry who have lobbied around the Forest Service calling for more unsustainable, industrial logging. This expectation is a very dangerous one to foster and a terrible precedent, unfair to the public who value natural processes, dangerous for the timber industry if they come to expect this and depend on it, unsustainable for the forest, damaging to wildlife, and untested in the scientific research.

Yet the consequences of this broadly applied and aggressive post disturbance logging policy on the BNF have not been enumerated, studied, or analyzed. Not only has this tacit broad scale policy of targeted post disturbance logging not been reviewed, but individual projects such as the Lost Trail Salvage project, fail to complete sufficient analysis of their individual effects much less the cumulative effects of all of these projects as a whole. In fact, that such a predictable policy of logging in disturbed areas exists should itself be considered an extraordinary circumstance that deserves full review and points to the inappropriate use of the CE authority in the case of the Lost Trail Salvage.

The proposed action has no value ecologically, except the possible ecological costs associated with logging large trees and destroying habitat. The proposed action will likely have little to no effect on the beetle infestations in forests of that area and amounts to a politically convenient way to sell huge Douglas fir trees to the timber industry at the

expense of all the other values that large dead snags offer. I would like to remind the BNF that providing logging opportunities is only one of its mandates amongst many others that the public expects, and that logging of native, previously unlogged forest is becoming more and more out of line with the values of most Americans. I would also remind the BNF that it has responsibility to all Americans equally, as these are National Forests that provide recreational, hunting, fishing, and spiritual opportunities to thousands of Americans who may or may not visit Montana each year.

Furthermore in response to a FOIA request we submitted to the BNF, the BNF and the Region 1 office admitted that they have no idea how much high quality large snag habitat exists across the BNF or the Region 1 forests overall. With the aggressive post disturbance policies of the BNF in the last many years, it is likely that great portions of high quality large snag habitat have already been degraded or removed. There has been no analysis of this issue which is relevant to many species, including many indicator, sensitive, threatened or endangered species such as fisher, flammulated owl, goshawk and black backed woodpeckers.

Legacy structures such as those proposed to be removed by the BNF will not return to the landscape for another several hundred years. The downed woody debris and understory structure these trees provide will not be rejuvenated for an additional couple hundred years that it takes old growth forest to fall and decompose once it has grown.

There was no analysis provided for the long term detriment to soils that this sale will have or the cumulative impacts of this sale together with the many other CE and salvage sales the BNF has proposed. With all of the roads and past industrial clearcuts on public and private land in the area, soils may have already been degraded. This proposal may add to that trend, especially where new, even temporary road, will be built and landing pads constructed.

Many of the units will also be visible from the road and will likely degrade aesthetic qualities associated with natural forest landscapes.

Overall, the categorical exclusion authority does not seem appropriate for this project for the reasons stated above and outlined in the Ecology Center's comments. In short, the list of extraordinary circumstances normally considered in CEs is inadequate and it is not clear that the BNF has fully analyzed impacts to even these.

Please contact us with any questions or clarifications you have.

Sincerely,

Cameron Naficy
Native Forest Network
P.O. Box 8251
Missoula, MT 59807

406.542.7343

cameron@wildrockies.org