

January 26, 2004

Bruce Higgins
Lolo National Forest
Building 24A, Fort Missoula
Missoula, MT 59804

Dear Mr. Higgins:

Thank you for speaking with me regarding concerns we have with the Lolo National Forest's proposed Mineral Fire Salvage Categorical Exclusion (CE) project. Thank you for also allowing us to submit comments on this proposed logging project.

As I mentioned on the phone, on October 19, 2003 the Native Forest Network lead twelve University of Montana students on a public education fieldtrip in the upper Gold Creek area and into the Rattlesnake Wilderness. A portion of the area we monitored that day now just so happens to include portions of the proposed Mineral Fire Salvage project. Since the Mineral Fire Salvage project was proposed on December 19, 2003 we obviously had no idea two months prior that our fieldtrip was actually in an area slated for logging.

As such, the original intent of our October 2003 fieldtrip was to monitor portions of the Mineral Primm fire that burned on both Forest Service lands and lands owned and managed by Plum Creek Timber Company. We were interested in comparing how the fire behaved in the heavily logged and roaded lands of Plum Creek versus how the fire behaved in the Rattlesnake Wilderness and in unroaded wildlands surrounding the Wilderness Area.

Our fieldtrip started at the gate at the bottom of USFS road #4323. From there we biked uphill approximately 5 miles to the West Fork of Gold Creek trailhead (this is trail #52). At the trailhead we parked our bikes and hiked along West Fork of Gold Creek trail (#52) for approximately one mile until we reached the Rattlesnake Wilderness boundary. At the Wilderness boundary we headed north and west to Bull Lake. We returned to the West Fork of Gold Creek trailhead using a similar route, although part of the group traveled on trail #52 while another part of the group traveled cross-country parallel to trail #52.

The following specific comments are based upon what I witnessed within the project area on the October 19, 2003 fieldtrip.

1. Logging would take place along a wilderness trail that leads directly into the Rattlesnake Wilderness. Unit 1 of the proposed Mineral Fire Salvage logging project starts at the trailhead for the West Fork of Gold Creek (trail #52). This is a popular trail that leads directly into the Rattlesnake Wilderness – an incredibly popular Wilderness Area of regional and national significance.

The Forest Service proposes to log along both sides of the West Fork of Gold Creek trail for nearly 1/3 of a mile. Except for the area immediately around the trailhead – which had been clearcut in the past – part of Unit 1 slated to be logged along this popular recreation trail is located in a previously unlogged and unroaded area.

As the enclosed/attached photos clearly reveal, the area in Unit 1 along the West Fork of Gold Creek trail burned at very low to moderate intensity. In fact, some parts within Unit 1 of the proposed salvage logging project did not burn at all. The Forest Service claims that this type of very low to moderate intensity fire is desirable; however, why then would the Forest Service propose a logging project in such an area?

Again, as you can see clearly in the enclosed/attached photo – which were taken from along the West Fork of Gold Creek Trail within Unit 1 – the fire burned in a beautiful mosaic, burning some trees, but leaving others completely untouched. You would be hard-pressed to convince anyone that the forest in Unit 1 along the West Fork of Gold Creek Trail is in need of post-fire “salvage” logging.

Our concern with the proposed logging project is that such a project will result in significant impacts to the “wilderness characteristics” of the area found along this trail. We feel strongly as if this fact represents an “extraordinary circumstance.”

2. Logging would take place within approximately 500 feet of the Rattlesnake Wilderness Area. According to documents from the Forest Service, Unit 3 of the proposed Mineral Fire Salvage logging project is located within approximately 500 feet from the boundary of the Rattlesnake Wilderness Area. In fact, according to Forest Service documents it appears as if logging would take place within 500 feet from the boundary of the Rattlesnake Wilderness Area for nearly 1/3 of a mile.

Furthermore, Unit 3 also appears to be an unroaded area that is located within 500 feet of the Wilderness Area.

The proposed Mineral Fire Salvage logging project would significantly impact the “wilderness characteristic” of the area. We feel strongly as if this fact represents an “extraordinary circumstance.”

3. Logging would take place within approximately 500 feet of an Inventoried Roadless Area. The northwestern portion of Unit 4 of the proposed Mineral Fire Salvage logging project is located within 500 feet of an Roadless Area that is an official Forest Service Inventoried Roadless Area.

This unit is also located within approximately 1/2 mile from the boundary of the Rattlesnake Wilderness Area.

As with Unit 3, we feel as if logging within Unit 4 of the proposed Mineral Fire Salvage logging project would significantly impact the “wilderness characteristic” of the area. We feel strongly as if this fact represents an “extraordinary circumstance.”

4. Logging project was announced during the winter with no opportunity for the public to visit the site area. As I mentioned, just by coincidence we happened to do some monitoring within Unit 1 of the proposed Mineral Fire Salvage logging project. However, we did not get an opportunity to monitor the entire unit, nor did we have an opportunity to get on-the-ground and monitor Units 2, 3 and 4.

This project was announced by the Forest Service on December 19, 2003. The fact of the matter is that during the comment period the proposed Mineral Fire Salvage logging project has been under deep snow.

Also, the road to the proposed Mineral Fire Salvage logging project (Forest Service road #4323) has a gate that is closed from October 15 to May 15 annually to ensure protections for wildlife species and for soil considerations. What this means is that the proposed Mineral Fire Salvage logging project area is essential “off limits” to the public during the comment and development period.

The only way an individual could get to the proposed Mineral Fire Salvage logging project area during the comment period would be to 1) ski uphill for over 5 miles one-way or 2) take a snowmobile. Either option is not realistic. Besides, even if you could physically get to the proposed Mineral Fire Salvage logging project area during the winter-months you would encounter snow too deep to monitor the project and get a feel for the area.

We are requesting that you withhold any decision regarding this project until the Forest Service organizes a public fieldtrip to the proposed Mineral Fire Salvage logging project area. In order for this fieldtrip to be meaningful for the public to gain better understanding of the project this fieldtrip cannot take place until at least after May 15, 2004 (due to access issues) and until the proposed Mineral Fire Salvage logging project area is free of snow.

This fieldtrip is requested since the proposed Mineral Fire Salvage logging project is located in extremely close proximity to the Rattlesnake Wilderness Area, an Inventoried Roadless Area and along a popular trail which leads directly into the Rattlesnake Wilderness Area. We feel strongly that once the public learns more about the proposed Mineral Fire Salvage logging project that they will want an opportunity to get out on-the-ground and see the project area for themselves. Obviously, since the Forest Service announced this project during the dead of winter such an on-the-ground fieldtrip is not necessary until a later date.

5. Native Forest Network received a copy of the project but no specific maps on the logging units. We received a copy of the announcement of these projects that included a very general description of the project as well as a map of the project area. Unfortunately, we did not receive a copy of the map “Mineral Fire Salvage Proposed Units.”

It wasn't until we checked with a colleague, who was sent a copy of the "Mineral Fire Salvage Proposed Units" map, that we realized that these logging units are located in extremely close proximity to the Rattlesnake Wilderness Area, an Inventoried Roadless Area and along a popular trail which leads directly into the Rattlesnake Wilderness Area.

We are concerned that other interested members of the public may have also not received a copy of the map "Mineral Fire Salvage Proposed Units." Since this map is important in determining exactly where the proposed project is located we feel as if the Forest Service must make certain that all interested members of the public received a copy of map "Mineral Fire Salvage Proposed Units." In other words, due to a copying oversight, we are concerned that the Native Forest Network was not only party that didn't receive the unit map.

6. This project is located directly adjacent to Plum Creek Timber Company lands that have been heavily logged and roaded. One thing was very clear on our October 19, 2003 fieldtrip as we biked up Forest Service road #4323: the Plum Creek Timber Company lands in the upper parts of the Gold Creek drainage have been extensively logged and roaded.

The enclosed/attached photos clearly demonstrate the extent to which these lands owned and management by Plum Creek have been hammered. And the Mineral Primm fire just made a bad situation worst. It's no wonder that firefighters fighting this fire dubbed the Plum Creek lands "the black desert."

The fact of the matter is that the Plum Creek Timber Company lands in the upper Gold Creek drainage are so poorly managed and so heavily logged and roaded that one could hardly say that this drainage needs even more logging.

Fortunately, some of the Forest Service lands in the upper Gold Creek drainage are either Inventoried Roadless Areas or unroaded wildlands where wildlife species can find some refuge. However, unfortunately, the proposed Mineral Fire Salvage logging project would result in logging in some of the last untouched and natural areas remaining in the upper Gold Creek drainage.

We have a hard time believing that the Forest Service has determined no negative "cumulative impacts" would result from the proposed Mineral Fire Salvage logging project, especially given the degree to which the Plum Creek Timber Company lands adjacent to the project have been poorly managed. We feel strongly as if this fact represents an "extraordinary circumstance."

7. Post-fire salvage logging harms the natural recovery process. Burned trees are an essential part of a healthy forest. While the Forest Service seems to be claiming that the proposed Mineral Fire Salvage logging project will have an insignificant ecological impact – it is a CE project after all – the best available science informs us that post-fire logging is one of the most ecologically-destructive forms of commercial logging because burned, dead and dying trees play a vital role in forest recovery.

Standing dead trees and fallen logs – which “salvage” logging removes – provide critical habitat for species including lynx, marten and fisher. Cavity nesting birds that thrive in post-fire forests include pileated and black backed woodpeckers, northern goshawks and boreal owls.

Standing dead trees provide shade, stabilize and regulate the water flow on post fire soils. The eventual decay of fire burned trees recycles important nutrients that increase forest productivity.

Most scientists agree that post-fire logging can severely damage soils, streams, vegetation, and wildlife and has no ecological benefit.

- “There is little reason to believe that post-fire salvage logging has any positive ecological benefits...there is considerable evidence that persistent, significant adverse environmental impacts are likely to result from salvage logging.” *Wildfire and Salvage Logging: Recommendations for Ecologically Sound Post-Fire Salvage Management and Other Post-Fire Treatments on Federal Lands in the West*
- “We know enough about both logging activity and structural change to recommend caution” in post-fire logging.” *U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Gen. Tech. Rep. PNW-GTR-486*

Post-fire logging has few, if any, economic benefits. Burned wood sells at low prices. The need to protect the fragile post-fire forest from the impacts of logging results in high costs. Post-fire logging may destroy economically valuable ecosystem services such as air and water purification and wildlife habitat.

Prioritizing ecologically-based restoration activities following a wildfire, such as watershed restoration and road removal, will produce numerous job opportunities in rural communities and will go a long way to restoring the health of our national forests.

Thank you for taking the time to review our comments on the proposed Mineral Fire Salvage logging project. Again, we are requesting that you withhold any decision regarding this project until the Forest Service organizes a public fieldtrip to the proposed Mineral Fire Salvage logging project area.

Given the proximity of this proposed logging project to the Rattlesnake Wilderness Area and an Inventoried Roadless Area, and the fact that it's located along a popular trail which leads directly into the Rattlesnake Wilderness Area we feel as if the public interest in this project is high. We believe that interested members of the public deserves an opportunity to actually get out-on-the-ground and see the proposed project area for themselves.

If you have any further questions, please feel free to contact me at 406.542.7343.

Sincerely,

Matthew Koehler
Native Forest Network

(Note: photos attached)