

August 9, 2004

Jimmy DeHerrera, District Ranger
Robert-Wedge Post-Fire Project
Glacier View Ranger District
P.O. Box 190340
Hungry Horse, MT 59919

Dear Mr. DeHerrera,

Please accept the following comments from the Native Forest Network and the National Forest Protection Alliance on the Robert-Wedge Post-Fire Project Draft Environmental Impact Statement. We incorporate by reference the comments made by Friends of the Wild Swan, the Swan View Coalition and the Great Bear Foundation as they accurately represent our concerns with certain aspects of the Robert Wedge DEIS. Following are additional comments that we hope you will take into consideration when making alterations to the project design for the Final Environmental Impact Statement and the final project decision.

Flathead and Kootenai National Forest Rehabilitation Act

The primary purpose of the Flathead and Kootenai National Forest Rehabilitation Act (H.R. 2691), as stated in several sections of the law including: Sec. 402(a)(3), (a)(4) and (b); Sec. 403 and Sec. 405(b), is restoration and rehabilitation. The collaborative process established by H.R. 2691 was completed at a cost to taxpayers of approximately \$180,000, yet this project proposal includes little restoration or rehabilitation work. Salvage logging, even when followed by planting, is not restoration or rehabilitation. What forms of restoration will take place and how will funding and timeliness be guaranteed?

Amendment 19

The decision to issue a Forest Plan amendment to exempt the project from Amendment 19 road standards is not adequately addressed in the DEIS. Considering that the Flathead National Forest is currently not in attainment with Amendment 19 road densities, that a Forest Plan exemption from Amendment 19 was issued in the Moose post-fire logging project and is currently involved in litigation and that the Amendment 19 exemption is sought in both the Robert Wedge and the Westside Reservoir post fire logging projects, why was a detailed analysis of these decisions to grizzly bears not conducted. The area affected by these cumulative decisions is huge, spanning virtually from the Canadian border down almost the full length of the Hungry Horse Reservoir and will affect numerous Grizzly Bear Management Units. Considering also that the suite of fires that swept across these areas may have changed the habitat quality or quantity within these units why is no analysis being conducted of the cumulative impacts of these decisions to grizzly bear populations?

Impacts of Salvage Logging

As highlighted in the DEIS itself and also by a multitude of recent studies, salvage logging has almost exclusively negative effects and can be much more damaging even than green tree logging since many ecosystem components are sensitive to added disturbance after a fire. These negative impacts include but are not limited to:

- Increased soil compaction.
- Increased erosion and subsequent high sediment loads.
- Long term productivity decreases.
- Delayed forest recovery.
- Decreased nutrient replacement.
- Decreased quantity of large woody debris and downed wood.
- Decreased diversity of standing snags and structural complexity .
- Increased future fire risk due to lack of snag shading and increased irradiance, lack of large downed wood which holds moisture through the driest parts of summer, higher wind velocity within stands that desiccates vegetation and can fan wildfire flames, denser regrowth due to the increased sunlight, and species composition changes due to exotics and altered microclimate.
- Inhibition of plant reestablishment and decreased overall growth rate.
- Impoverished mycorrhizal communities crucial to the future development of forests.
- Loss of significant numbers of uprooted snags and the habitat these create. Uprooted snags create holes that are particularly important on steep slopes as they provide moist microclimate sites for vegetation establishment, create topographic diversity, help to catch sediments and build soil deposits. Stumps do not uproot easily and thus do not provide this ecosystem function.

Lindenmayer et al (2004) state “Salvage harvesting activities undermine many of the ecosystem benefits of major disturbances.” They list four negative impacts associated with post fire logging that contribute to this:

- “Removal of large quantities of biological legacies can have negative impacts on many taxa” by removing habitat.
- Post-fire logging “can impair ecosystem recovery...with major negative impacts on the regenerative potential of stands.”
- “[S]ome taxa may be maladapted to the interactive [epistatic] effects of two disturbance events in rapid succession.”
- “[G]ood planning should guide the timing and intensity of salvage harvesting” they say, but “[l]arge-scale harvesting is often begun soon after a wildfire, when resource managers make decisions rapidly, with long-lasting ecological consequences.”

Further evidence for the negative impacts of post fire logging the Robert Wedge areas is found in the DEIS itself by comparing Table 57 on p. 197 and Tables 49-50 on pages 144-149 or by perusing the impact analysis on sensitive species that precedes this. What is evident from these data is that, according to even the limited analysis included in this DEIS, post fire logging poses a significant risk of negatively impacts to almost every species listed in Table 57. The only species that receive a “No Impact” rating for the action alternative, with the exception of the Common Loon and the Harlequin Duck in the Wedge area, do not occur in the project area. It follows relatively easily that there cannot be any negative impact to species that don’t occur in the area where action and analysis is conducted and seems a rather pointless exercise considering such. Other species that could be used to indicate the impacts of this project to wildlife should include grizzly bear, Canadian lynx and bull trout.

The DEIS does not seem to directly address these negative impacts of post-fire logging, especially as they may have resulted from the cumulative impacts of all past, current, and reasonably foreseeable actions.

Extent of Impact Analyses

Claims made in the DEIS that the vast majority of the fire area will be left unlogged are misleading. These claims seem to represent a bold attempt and a fatuous justification to log much of the existing areas with merchantable timber that has been previously unmanaged or managed lightly enough that suitable timber and valuable wildlife habitat still exist. The truth is that a substantial portion of the area in the Roberts and Wedge areas outside of Inventoried Roadless Areas (IRAs) have already been logged (see map attached map entitled “Extent of Logging”). Mapping past logging projects and juxtaposing the proposed units shows that a majority of the non IRA forest within both the Robert and Wedge fire perimeters will have been logged if the current action is carried out. In addition, unlogged areas will be scattered about in a highly fragmented distribution which generally does not serve as good wildlife habitat.

Such intensive logging would seem likely to pose a significant threat to species’ continued viability in the Robert and Wedge project areas as well as the larger North Fork Valley where past logging has had similarly widespread impacts that may have already significantly affected many species. Whether the DEIS found that the action alternative posed no significant threat to species viability in the project area because it analyzed the action alternative’s impact on species that don’t occur in the project area or because the analysis area was too narrow is unclear but should be looked at more carefully. Past logging in the North Fork includes both green tree logging and logging of dead trees killed by fire, beetles or disease and should thus be included in the analysis.

Why has information on past logging in the North Fork Valley not been included in the DEIS and in the impacts analyses conducted for the DEIS? It only seems

logical to consider the broader context of management in the North Fork as it relates to current management decisions in the Robert and Wedge Project areas. Most of the cumulative effects and other impact analyses focused only on the immediate Robert and Wedge project areas.

Analysis in the DEIS on pages 232-236 shows that nearly half of the large diameter Douglas fir and larch had been logged in the Robert fire area by 2001 and that just over half were logged in the Wedge fire area. Taking into consideration the large snags that will be cut as required by OSHA standards and those stands that have already been clearcut as part of roadside removal operations, another 20%-25% of this habitat will be removed in both fire areas under the proposed action,. This would leave somewhere around 25%-30% of the original large diameter larch and Douglas fir in the project areas.

The DEIS contains no similar analysis for other tree species and does not include similar analysis for green trees of any species despite the heavy logging of green trees in the Robert Wedge vicinities and the North Fork overall. Why has this type of analysis been limited to the project areas and not been expanded to include the North Fork? Considering the compelling evidence that large scale logging of green and dead trees has likely impacted the project areas, the North Fork Valley, and the Flathead Forest as a whole it would seem that the analysis described above would be necessary to determine the impacts already made to wildlife and to the ecosystems contained in the North Fork, Robert and Wedge.

Furthermore, no meaningful cumulative effects analysis of even the above finding for just larch and Douglas fir is provided, only a list of parameters that could contribute to the cumulative impacts analysis. There is no mention of how past activities have actually affected species' abundance, distribution, diversity, or population parameters such as resilience, overall health, behaviors, or required habitats. Comprehensive cumulative effects analysis should include analysis at both project level and regional (eg. the North Fork Valley) scales, should include analysis of all past, present, and reasonably foreseeable activities (ie Moose, Red Bench, and Westside Reservoir post fire logging projects) for both these scales, and analyze the effects of both green tree and salvage logging on a variety of tree species. Just because the Robert Wedge project is a post fire salvage logging project does not mean that past green tree harvesting is irrelevant.

Analysis Concerns and Questions

As is stated on p. 222, one third of bird and mammal species in the Rocky Mountains require snags, while 42 species of birds and 10 mammal species in the Flathead National Forest are *dependent* on dead trees. Has the analyses conducted to determine whether or not species viability will be threatened by the action alternative taken into account the cumulative habitat needs of all of these species or has it analyzed each species' needs independently? If the latter

method was implemented in the analysis, it would seem to indicate that all of the 42 bird species and 10 mammal species could use the same exact burned stands and that an individual burned tree could simultaneously fulfill the habitat needs of all 52 of these species. How have the cumulative habitat needs of these snag dependent species, as well as other users and competitors in the post fire environment, been taken into account in the analyses and implemented in the design of cutting units?

On page 137, it is casually stated that “Past harvesting activity removed significant volumes of spruce. As a result of high mortality in older overstory spruce and the widespread harvest activity, many acres of what were once mature and older spruce forests were converted to young, early seral seedling and sapling forests.” Why is spruce being targeted for unrestricted removal considering the above facts and why is there no analysis of the impacts of this removal, past and proposed? Spruce snags do not stand as long as larch or Douglas fir and so contribute significantly to early large downed woody debris recruitment. Large, burned spruce in particular is mentioned in the DEIS on p. 226 as being of high quality downed log habitat. Thus large spruce should be categorically excluded from logging treatments. What effects will removing spruce from the ecosystem have on forest regeneration and early stage habitat functioning of the burned forest for forest species?

True firs, such as subalpine fir, are also targeted for unrestricted logging despite their importance to mycorrhizae. What are the benefits of subalpine fir in the post fire environment and why has unrestricted removal of this species not been analyzed in the DEIS?

One of the action alternative’s stated goals on p. 214 is “to leave a diversity of conditions while working with natural pre-fire variations in vegetation, as well as the variation in fire severities.” It would seem like the desired “diversity of conditions” referred to in this statement would be a diversity of species, as is mandated in NFMA and in the Flathead National Forest’s Forest Plan. In reading further, though, it becomes apparent that the “diversity” referred to treatment diversity. This concept then seems to be built into cutting prescriptions in the form of the Snag Emphasis Levels and Patch Retention designs. Several problems may exist with this methodology.

It is not clear that the prescriptions will actually lead to diverse species as it portends. Applying a diversity of treatments to the project areas may not actually create diverse habitats, especially if some habitats are rare. For instance, both within the project area, and certainly within the North Fork proper, both killed and green old growth is relatively rare and should not be cut. All old growth, burned or not, should be removed from the action alternative. Analysis should include multiple scales (ie, the project area and the North Fork region) and treatments could then be chosen that would best create diverse habitats, whether those treatments were themselves diverse or not.

The action alternative would seem to further homogenize and degrade wildlife habitat, not make it more diverse and functional for more species. The action alternative would cut all merchantable fir, spruce, lodgepole, and species other than larch and Douglas fir. As stated earlier, a large amount of the large spruce within the North Fork has already been logged, as has large subalpine fir. How will this prescription help to create habitat diversity? Granted there will be some diversity in total snag retention and grouping resulting from pre and post fire conditions, but other than that it seems like generally the forest will have larch and Douglas fir overstories that lack all but small sized, unmerchantable snags of other species. Furthermore, these stands will be fragmented by old and new clearcuts, roads, and other heavily managed forests. How much unlogged, burned habitat, which is generally best for many post fire dependent species, will be left? With near 50% of large diameter larch and Douglas fir already cut and how can 25% more be cut in the name of treatment diversity? How can habitat diversity and affect on species be determined without multiple scale analysis of cumulative impacts to all habitat types ? How will stands produce a continuous supply of snags over time if only certain species of snags that are already wildlife trees are protected?

Species Viability Criteria, Analyses and Concerns

It is often stated reassuringly in the DEIS that species viability is not threatened by the action alternative or past management activities because Glacier National Park has plenty of “good” habitat such as unburned, unmanaged, diverse forests. The same is said, although to a lesser degree about IRAs. NFMA and the current Forest Plan do not allow forest destruction to occur to the point that the Flathead National Forest would not be able to sustain viable populations of its species just because Glacier National Park lies adjacent to it and provides good habitat. The NFMA viability requirement states that “habitat must be well distributed so that those individuals can interact with others in the planning area [ie the Flathead National Forest].” This is reiterated in the DEIS on p. 587 with specific reference to snag retention where it states “Unharvested snags in areas outside USFS land cannot be relied upon to maintain viable populations of vertebrate species.”

For instance, at the bottom of the first paragraph on p. 150 the DEIS states “These areas, especially in Glacier National Park, currently contain habitat to support high densities of black-backed woodpeckers.” The other areas this statement refers to are the Moose and Red Bench fires. The Red Bench Fire was 16 years ago and is likely only providing habitat to a very few post fire or snag dependent species. The Moose Fire, along with most of the fires that have occurred in the North Fork Valley, has been logged as is now proposed in the Robert Wedge Post Fire Logging Project and it is unclear from the analysis provided in the current DEIS how useful these managed post fire landscapes are to the black backed woodpecker or other post fire dependent species. Many

studies have shown that managed post fire landscapes may be poor habitat for numerous post fire associated species. How many unmanaged, burned acres of habitat exist in the North Fork from fires within the last 5, 10, 15 years, how is it distributed and is it substantial enough to maintain species viability for a myriad of species?

Another concern lies in the fact that areas previously managed for partial removal seemed to be generally included as suitable habitat in the analyses of cumulative impacts. Was partial removal categorically included in the suitable habitat calculations for various species and the determinations of threat to species viability? Was there distinction made between units previously treated with partial removal and was this based on site specific data? This point could have great bearing on the determinations made in the various analysis.

Other Concerns

No logging should be conducted in pre or post fire old growth areas.

No new roads should be built, even if they are temporary and previously restored roads should not be rebuilt, as the flathead NF is currently in violation of amendment 19 road densities meant to protect the threatened grizzly bear. The very studies that led to the creation of amendment 19, as well as many others, show that there is no ecologically significant difference between open or closed roads and that temporary roads still pose negative impacts to many species of wildlife. Therefore, new road building projects of any kind in areas of non attainment with Amendment 19 should not be allowed. All units that require new roads to be built or old roads restored to functionality should be dropped from the project.

Active reseeding and replanting should be conducted only under limited conditions – since it has not been shown to advance regeneration and has had little analysis in the DEIS.

No logging should take place in roadless areas, even if they are not IRAs. These areas are still valuable habitat as roadless areas and should not be degraded.

Thank you for your consideration

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