

March 1, 2004

Hungry Horse/Spotted Bear Ranger District
Attn: District Ranger, West Side Reservoir Post-Fire Project
P.O. Box 190340
Hungry Horse, MT 59919

Dear Project Leader,

Please accept these comments on the Westside Reservoir Post-Fire Project on behalf of the Native Forest Network and the National Forest Protection Alliance. We incorporate by reference the comments made by the Friends of the Wild Swan and the Swan View Coalition, including any attachments and exhibits made therein.

What the Flathead has proposed here in the Westside Reservoir Post-Fire Project is a continuation of the trend to log along most of the Flathead NF's eastern border in an already heavily impacted forest by circumventing its own Forest Plan. Forest Service maps show that nearly the whole west side of Glacier and the eastern side of the Flathead NF has burned since 1910, much of it within the last two decades. Concurrently, the Flathead has logged and is continuing to propose massive logging projects in these areas immediately following the fires while blatantly disregarding its duties by its own Forest Plan and the Endangered Species Act to protect the Grizzly Bear and other wildlife species. We see no element of restoration included in this project proposal, only attempts to circumvent the Flathead NF's Forest Plan, its responsibilities under the Endangered Species Act, and its obligations to the people and wildlife who share these forests.

Public remarks by Forest Supervisor Cathy Barbouletos and some of her coworkers make it explicitly clear that the Flathead has no intention of holding true to its Forest Plan or its promises to make socially and ecologically responsible management decisions. The Flathead NF has responsibility to the whole nation and to the wildlife that reside in the Flathead NF, not just the logging industry. Would the thousands of people who visit Glacier National Park each year agree that logging along much of the western border of the park was the right way to balance the multiple use objective?

With all of the recent fires in the Flathead NF, the high road densities, and the huge volume of wood that has already been removed from the Flathead NF, restoration would seem to be a more appropriate priority than further degradation of this forest important to so many creatures and people. Salvage logging, even when followed by replanting is not restoration.

We request that an analysis of the cumulative impacts of recent post fire logging projects including the Moose, Robert, Wedge, Westside Reservoir, and other recent projects be included in the DEIS. What steps has the Flathead NF taken to monitor the effects on wildlife species that the combination of fires, post fire logging projects, and non attainment of the Flathead Forest Plan Amendment 19 have had and how are these findings being integrated into the Flathead NF's management strategies? We request that

this information be included in the DEIS and thoroughly considered before moving ahead with massive logging projects such as the Westside Reservoir Post-Fire Project.

A new report was published today (03/01/04) by Lindenmayer et al in the peer-reviewed and highly distinguished journal *Science*. Several key points were made in the study that are relevant to the Westside Reservoir Project. They are as follows.

(1) Post fire logging reduces structural complexity of ecosystem components. The authors state, “Species recovery and ecosystem revitalization are strongly influenced by the types, numbers and spatial arrangements of biological legacies remaining following natural disturbance. They maintain biodiversity and key ecosystem processes in numerous ways, from facilitating species recovery to restoring nutrient levels.” Biological legacies are recognized as organisms, structures, and patterns that survive from the pre-disturbance system. Post fire logging removes many of these “biological legacies” by removing snags and living trees, increasing soil erosion and nutrient loss, and recontouring the landscape via roadbuilding. The study further reports, “removal of large quantities of biological legacies can have negative impacts on many taxa. For example, salvage harvesting removes critical habitat for species, such as cavity-nesting mammals, woodpeckers, invertebrates like highly specialized beetle taxa that depend on burned wood, and bryoflora closely associated with recently charred logs. Salvage logging after the 1939 wildfires in Victoria contributed to a shortage of cavity trees for more than 40 species of vertebrates, including highly endangered ones.... This problem may take more than 200 years to be rectified.”

(2) Post fire logging can impair ecosystem recovery. The study found that post fire logging has “led to significant forest deterioration and loss with major negative impacts on the regenerative potential of stands as well as a range of other undesirable effects.” Other studies corroborate these findings. Sexton (1994) found that even in areas salvage logged over snowpack, vegetative biomass produced 1 and 2 years after postfire logging was 38% and 27% of that produced in postfire unlogged stands. Post fire logging also decreased canopy cover, increased exotic plant species, increased graminoid cover, reduced overall plant species richness, and decreased pine seedling growth by 17%. Grifantini (1990) found that shrub and forb growth was suppressed for several years in post fire logged stands.

(3) There may be compounding, cumulative or magnified effects on ecosystem processes and elements of the biota if an intense natural disturbance event is soon followed by an intensive (and often prolonged) human disturbance. In other words, the epistatic, or interactive, effects of two or more disturbances in a short term period such as large fires, post fire logging projects, and high road densities outside of Amendment 19 levels may potentially result in very real, negative impacts to wildlife species within the Flathead National Forest. Again, considering the scale and geographic range of recent fires, past logging, and proposed logging activities in the Flathead NF, the areas wildlife, especially endangered and threatened species, may be under heavy stress levels that this project will only exacerbate. The study by Lindenmayer et al (2004) essentially hints that we may not be able to accurately predict population level responses

to consecutive disturbances with much accuracy, which would seem to imply that careful planning of management activities be requisite. What considerations has the Flathead made to address epistatic effects on wildlife species, especially those listed under the ESA and in light of the scale of recent fire events, nonattainment of Amendment 19, and post fire logging proposals?

(4) Post-fire logging cannot replicate natural processes to produce the environmental heterogeneity associated with natural disturbance. The Lindenmayer report states, “Salvage harvesting activities undermine many of the ecosystem benefits of major disturbances. For example, extensive salvage harvesting after the 1938 New England hurricane produced a long-lasting shift in hydrological regimes on a regional scale. Hurricane-damaged forests exert strong biotic regulation over biogeochemical and hydrological processes. In Baxter State Park, Maine, soils in blown down forests where salvage logging occurred were more affected by a subsequent fire (as measured by horizon depth, organic soil coverage, and percent combustible organic matter) than soils in comparable forests in the park where salvage logging was not allowed.” It is also evident from the actions included in the scoping document that the selective harvesting of particular tree species will occur and lead to an unnaturally skewed species distribution and subsequent habitat degradation compared to unlogged conditions.

Furthermore, there is no evidence that post fire logging can decrease the intensity of subsequent fires. McIver and Starr (2000) state, “following Beschta and others (1995) and Everett (1995), we found no studies documenting a reduction in fire intensity in a stand that had previously burned and then been logged.” In fact, the Forest Service often admits that post fire logging will increase fire risk for years after logging has been completed.

We cannot stress enough that the cumulative impacts of fires, roads and logging have not been well analyzed in this project proposal. With respect to fisheries and watershed health, McIver and Starr (2000) state, “we do not know how site-specific effects accumulate over watersheds, and this knowledge is essential if forest management is to be linked to aquatic integrity.” This process of accumulating site specific data must occur to assess the impacts of this logging project to watersheds, wildlife, and forest health.

In light of all of this, how can the Flathead NF propose to log 70-80 MMBF in this project alone, the majority of which (~88%) is in areas most heavily impacted by the fires?

The following analysis should be included in the DEIS.

- How was the 70-80 MMBF figure derived?
- Estimated quantity, size class, species and distribution of trees to be harvested
- Will a diameter cap be included in the project and what size will this be?

- What is the projected condition of the forest after post fire logging. What will the forest look like after post fire logging activities—i.e. number, size, species, and distribution of standing snags/acre, sediment loads, erosion rates, etc.?
- What standards will there be to measure the impact of post fire logging activities to ecosystem health?
- What monitoring plans will be implemented to ensure that standards will be met?
- Logging proposals should be based on site specific analysis of soil conditions, vegetation impacts, species needs, and projected impacts of logging activities on ecosystem components. These analysis should be included in DEIS and should show how the Flathead NF came to their estimates of acceptable logging quantities and the process for accomplishing this.

Further Considerations

- No logging should take place in or adjacent to roadless areas or park and wilderness boundaries
- No temporary, template, or new roads should be made while Amendment 19 is being violated
- No logging should be in Old growth areas or pre-burn old growth areas
- No logging in areas with erosive soils, sensitive soils, high severity burn, steep slopes, or in riparian areas

The Westside Reservoir Project proposal is really an abomination of forest management. It seems that there is little regard for the law, ecological purpose, wildlife safety, or natural processes and that the Flathead NF is intent only on getting vast quantities of timber into an already flooded market despite the best science and the ecological damage that will result.

Considering the scale of the fires, the extensive road system, and the number of other logging proposals in nearby areas, we are fully opposed to salvage logging in this project.

Any projects in the area should focus on road reclamation and the Flathead should not seek to undermine its own Forest Plan.

Sincerely,

Cameron Naficy
Native Forest Network

Jake Kreilick
National Forest Protection Alliance

References

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Sexton, T. O. 1994. Ecological effects of post-wildfire salvage-logging on vegetation diversity, biomass, and growth and survival of *Pinus ponderosa* and *Purshia tridentata*. Corvallis, OR: Oregon State University, Department of Rangeland Resources. 28 p. Unpublished manuscript. On file with: Department of Rangeland Resources, Strand Agriculture Hall, Oregon State University, Corvallis, OR 97331.