

December 6, 2004

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Ms. Hollingshead:

These are comments on the Middle East Fork Hazardous Fuel Reduction project proposal (the October 28, 2004 letter from Forest Supervisor), on behalf of the Native Forest Network and National Forest Protection Alliance.

Our comments are based on our collective experience with Forest Service proposals over the past two decades, in addition to site-specific observations we made during an on-the-ground monitoring trip to the Guide Creek, Jennings Camp Creek, Colvert Creek and Bertie Lord Creek areas on November 20, 2004.

In fact, we have put together a website with lots of photos from our November 20, 2004 field trip within the proposed Middle East Fork Hazardous Fuel Reduction project area. The website is [http://www.nativeforest.org/middle\\_east\\_fork.htm](http://www.nativeforest.org/middle_east_fork.htm). **We request that you download this website and include it in the project record.**

As you know, on December 3, 2003 President Bush signed the Healthy Forests Restoration Act (HFRA) of 2003 into law. While conservation groups – such as the Native Forest Network and National Forest Protection Alliance – support protecting communities from wildfire and putting people to work restoring our national forests, we are concerned that the HFRA will be using community protection and forest restoration as a smokescreen for more logging in our public forests.

Unfortunately, many of our concerns regarding the Healthy Forests Restoration Act of 2003 appear to be coming true in regards to the proposed Middle East Fork Hazardous Fuel Reduction project. As far as we are aware, this is the first proposed HFRA project in Montana.

In our view, the proposed project, located along the East Fork of the Bitterroot River, would mix a small amount of bona-fide community protection work with logging over nine square miles (over 6,000 acres) of forest, including logging in previously unlogged, old-growth forests.

Many of the areas slated for logging under the Middle East Fork Hazardous Fuel Reduction project are large pockets of unlogged, native forest surrounded by clearcuts from previous industrial logging projects.

These forests are home to bull trout, cutthroat trout, wolves, elk, moose, black bear, coyote, mule deer, goshawk, martin, black-backed woodpecker, pileated woodpecker and flammulated owls.

According the October 28, 2004 letter from Forest Supervisor and based on personal conversations we had with Bitterroot National Forest personnel during your November 18, 2004 open house, the rationale for logging huge, old-growth Douglas Fir is that these legacy trees are either infested with beetles or “at imminent risk of spread of the beetle epidemic.” The Forest Service is ignoring the fact that insect and disease mortality, even in “epidemic” proportions, are a natural occurrence and very important in maintaining overall “forest health.”

Also, based on conversations we had with Forest Service personnel during your November 18, 2004 open house, the rationale for this project seems to change quickly when the Forest Service’s rationale is questioned or challenged by members of the public.

For example, if this project is in fact a “hazardous fuel reduction” project – as stated in the title of the project – what is the rationale for cutting down large, Douglas-fir trees? Do you really expect the public to believe that a 200 year-old, three foot diameter Douglas-fir tree (living, dead or dying) is a fuel hazard?

Forest Service personal would respond at the open house by saying, “No, these trees are not a fuel hazard but they might end up on the forest floor and then they will be a fuel hazard.”

So, do you really expect the public to believe that some event will take place that will result in all these large, Douglas-fir trees falling to the forest floor at the same time? Do you really expect the public to believe that large, Douglas-fir trees on the forest floor are really a fire hazard?

Forest Service personnel would then tell us that the project is not about fuel reduction, but about restoration. Again, do you really expect the public to believe that cutting down 200 year-old, three foot diameter Douglas-fir trees (living, dead or dying) is the way you properly restore a forest?

**You have been provided with a copy of the “Community Protection and Local Economy Alternative,” developed collaboratively by the Friends of the Bitterroot, Native Forest Network, National Forest Protection Alliance and The Ecology Center.**

**We strongly urge the Forest Service to include, for full analysis and comparison with other alternatives, the Community Protection and Local Economy Alternative. Such an alternative makes more sense than your proposal, for dealing with the risk of wildlands fire to private property and in recognition of natural processes sustaining these fire-adapted ecosystems.**

## **Regeneration Harvesting**

It is not clear from the scoping documents or conversations we had at the open house meeting for this project how the regeneration harvest units, which are essentially clearcuts of beetle killed trees or those that are assumed will die from beetles, correspond to any of the stated goals of this project or the goals of the Healthy Forests Restoration Act. How does regeneration harvesting help to protect the Sula or East Fork communities? How does regeneration harvesting restore fire adapted ecosystems and how does it help to restore beetle killed stands or prevent the spread of the beetles to nearby stands?

The notion that clearcutting large tracts of mature forest, much of it beetle killed old growth and functionally still important large snag habitat, will reduce fire hazard is accompanied by no justification in the scoping documents and seems to be largely unsubstantiated by the body of scientific literature. Prescriptions such as the regeneration cuts proposed in the Middle East Fork project that intend to clearcut mature and old growth forest in order to reduce fire hazard are ineffective, short sighted, ecologically damaging and often just a cover for commercial logging. Prescriptions that aim to simply reduce fuel loads as an ultimate goal, as if reducing fuel loads were commensurate with reducing fire hazard and protecting communities, ignore factors such as the distribution of fuel sizes, fuel location with respect to communities, natural fire patterns, ladder fuels, and the importance of treating the areas immediately surrounding homes, all of which, if included, would lead to a much more dynamic prescription than just clearcutting. It is difficult to see how regeneration cutting could fit into such a dynamic prescription at all.

We fail to see how clearcutting tracts of forest help to restore fire adapted ecosystems as this type of cutting leads to increased irradiation, decreased soil moistures, impoverished long term structure, decreased ecosystem resiliency, increased wind exposure, and fails to recognize that beetle killed stands are a perfect opportunity to let ecosystems recover naturally under their own fire regimes.

The regeneration harvests will not significantly help to reduce the spread of beetles within the Middle East Fork or the project area for several reasons. Preventing the spread of beetles is a task of Herculean proportions that has been attempted for decades, rarely successful on any meaningful scale, and hugely cost intensive. Prescriptions such as the regeneration harvests are doomed to failure if the intent is to reduce the spread of beetles as they focus on trees already killed by beetles, many of which have been dead for a while now and are no longer even a significant source of beetles, and destroy habitat and feeding sources of birds and other species that feed on beetles and help to keep beetle populations in check.

It is also not made clear how regeneration cutting helps to restore healthy forest stands. Planting aimed at hastening the return of trees to the site, while itself a questionable practice aimed more at restoring the timber base than providing for habitat, can be accomplished perfectly well without regeneration harvesting. If anything, regeneration logging is greatly damaging to the natural recovery of the area through succession as it

almost entirely removes legacy structures that will not be replenished for another 200-500 years and thus reduces the long term complexity and resiliency of the area. It removes the long term source of nutrients and the water retention capabilities of the forest thus retarding forest health, potentially over centuries, and it often leads to reduced water quality via increased runoff and sedimentation rates.

Based on the above concerns, and without substantive responses to these concerns in the DEIS, it is unclear how the regeneration harvests can be justified as anything but an attempt to log for the commercial returns that will follow. Commercial logging is not within the scope of this project based on the stated objectives, purpose and need or within the scope of the HFRA unless there is some justification related to community protection or forest health for this prescription other than the commercial incentive.

Our concerns that the proposed regeneration harvests have little to do with community protection or forest health are further piqued by the fact that virtually all beetle killed old growth treated in this project is slated for regeneration harvesting and that in general the regeneration harvests seem to be placed in areas with significant tracts of highly valued commercial timber. Many of the regeneration cuts are located outside of the Wildland Urban Interface (WUI) in the tributary creeks that feed into the East Fork where substantial tracts of green and beetle killed old growth exist.

### **Why are regeneration cuts proposed outside of the WUI?**

No justification was given in the scoping documents. If it is due to condition classes and attempts to restore “historical/natural conditions” then this should be stated and detailed explanations given in the DEIS.

What are the cumulative impacts of regeneration harvesting considering that the relevant watersheds have already experienced past clearcutting and other vegetation management? The DEIS should include a detailed cumulative impacts analysis.

### **Condition Class Analysis**

No description of the post fire/post beetle kill condition classes are provided. Were condition class maps that are being used for analysis made pre-fire or post fire? As the old growth distribution has been modified as stands are killed by beetles or fire, there has been no similar description of how these events have affected the condition class. There should be. A condition class 3 forest, pre-fire, is not necessarily a condition class 3 forest after the fire is it? There must be some analysis of this included in the DEIS. At the very least, if the condition class maps have not accounted for the beetle and fire effects on stands, a new analysis must be done on a case by case basis of each unit or the project area to determine the condition class of these forests currently and projected estimates should be made about the changes in condition class over some future time period as the recent fires and beetle epidemics may naturally be returning these stands to “historic range”, or closer to condition class one.

## **Forest Plan Amendments**

The DEIS must state specifically what each of the Forest Amendments addresses. That is, the DEIS must explain in detail the reasons why the amendments are being proposed, why the proposed actions can't be accomplished without amending the Forest Plan, and why the proposed actions are necessary and relevant to this project with regard to its stated goals. The DEIS must further include an analysis of the impacts of these exemptions from the Forest Plan, individually and cumulatively across the project area and in conjunction with other past, present or reasonably foreseeable exemptions outside the Middle East Fork project area, to the overall goals of the Forest Plan.

## **Notification of Project and Collaborative Meetings**

When the Native Forest Network found out about the Middle East Fork Hazardous Fuel Reduction project via the October 28, 2004 letter from the Forest Supervisor this was the first time we had been contacted regarding this project. This, despite the fact that the Native Forest Network has requested, on numerous occasions, to be notified about projects on the Bitterroot National Forest.

In fact, in November 30, 2004 email from Tracy M Hollingshead to Matthew Koehler of the Native Forest Network, the Forest Service acknowledged that, "The notification for the Middle East Fork meeting in Sula on March 18, 2004 was not sent to Native Forest Network."

It makes it very difficult for us to participate in collaborative meetings that we have no knowledge of.

Be that as it may, once we did find out about this project based on the October 28, 2004 we took an immediate interest in this project. In addition to attending the November 18, 2004 open house members of the Native Forest Network and National Forest Protection Alliance have held numerous conversations with Forest Service personnel regarding this project.

We also conducted an on-the-ground monitoring trip to the Guide Creek, Jennings Camp Creek, Colvert Creek and Bertie Lord Creek areas on November 20, 2004 in order to provide site-specific observations.

In the future, if the Forest Service is truly serious about gathering public input and if the Forest Service values site-specific observations it would be very helpful for us to have more than one month to gather that information. We received the October 28, 2004 letter on November 5, 2004 and the comments were due by December 6, 2004.

Not only is this a tight time-frame for a project area that covers many square miles and over 6,000 acres of proposed treatments, but this time-frame also lands right in the middle of hunting season, in the middle of "holiday" season and during winter months where actually getting to large chunks of the project area may be physically impossible.

In other words, we think if the Forest Service really wants site-specific observations from the public they will not force the public into the woods only during hunting season, when it is very dangerous for non-hunters to be out in the woods – despite precautions we might take.

Also, we were unable to completely monitor many of the units up the Guide Creek drainage because of the snow and ice on the roads that made it impossible – and dangerous – for our vehicle to go any further.

### **Other Questions and concerns**

How was the Wildland Urban Interface (WUI) defined?

On the map provided with scoping, some of the private lands seem to have no treatments proposed around them. Why is this? Is wildfire not a risk there, or have other measures been taken? The DEIS should describe why units and prescriptions were developed and located as shown and why some areas around private lands are not being treated.

What are the cumulative effects of past clearcutting with proposed clearcutting (i.e. regeneration harvesting), especially to watershed health since many of the units located in tributaries to the East Fork are on steep to very steep slopes?

The FS does not seem to recognize the value of the post fire/post beetle epidemic environment, the importance of standing snags and other legacy structures, or the natural processes of succession. This is clear from the fact that it is regenerating so many of the heavily affected beetle areas and commercially thinning many of the individually killed trees that would provide snag habitat. How does the FS justify this? Beetle epidemics have often followed close on the heels of fires—leaving perfectly healthy forests. This discussion should be included in the DEIS.

### **Final Thoughts**

As we mentioned earlier, many of our concerns regarding the Healthy Forests Restoration Act of 2003 appear to be coming true in regards to the proposed Middle East Fork Hazardous Fuel Reduction project. As far as we are aware, this is the first proposed HFRA project in Montana.

To be perfectly honest, we were very surprised to see the Bitterroot National Forest pushing forward with a huge project under the HFRA that targets old-growth forests on the Bitterroot and requires forest plan amendments.

This is especially true considering that this new logging plan falls on the heels of the failed Burned Area Recovery Plan that has resulted in logging of over 14 square miles of big trees while most of the promised road and watershed restoration work is not completed.

When will the Bitterroot National Forest learn its lesson?

**Again, You have been provided with a copy of the “Community Protection and Local Economy Alternative,” developed collaboratively by the Friends of the Bitterroot, Native Forest Network, National Forest Protection Alliance and The Ecology Center.**

**We strongly urge the Forest Service to include, for full analysis and comparison with other alternatives, the Community Protection and Local Economy Alternative. Such an alternative makes more sense than your proposal, for dealing with the risk of wildlands fire to private property and in recognition of natural processes sustaining these fire-adapted ecosystems.**

Sincerely,

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