



To: Planning Team Leader
Robert-Wedge Post-Fire Project

November 23, 2004

Comments on Robert-Wedge Post-Fire Project FEIS from Flathead Audubon Society

After reviewing the FEIS we feel compelled to comment on several aspects of the analysis and Proposed Action.

Snag Management:

The Flathead Audubon Society (FAS) is very disappointed in the changes in “snag” management made between the DEIS and FEIS. The snag prescription in the DEIS did a much better job of providing snag habitat than does the prescription in the FEIS. The FEIS fails to follow the well thought out, documented, and site-specific approach developed by your ID Team and described in the DEIS. The FEIS prescription is obviously aimed at increasing the harvest of large snags rather than providing adequate snag habitat within harvest units.

The FEIS drops the retention of snag patches within harvest units with no explanation of any science behind this. The only explanation noted was on page 3-149 where it says that snag prescriptions were modified in response to comments on the DEIS. FAS supported in our FEIS comments, and still does, the retention of snag patches based on the science available concerning species territoriality and the use of snag patches.

The FEIS counts live trees toward meeting the minimum “snag” requirements and this is a significant difference between the FEIS and DEIS that is not disclosed or analyzed. It has the effect of allowing even more true snags to be harvested to the point that some harvest units might not have any true snags left if there are enough live trees. This approach certainly does not maintain the real snag habitat created by fires and is misleading to include live trees in the “snag” management. It appears that part of the justification for including live trees is that they may eventually die and provide snags. This is a very weak argument since all trees will eventually die. The real question is how many are currently dead due to the fire and these are the ones to be managed for snag habitat. Leaving live trees to provide a legacy of live and/or large trees certainly can contribute to snags at some point in the future but management of those killed outright by the fires is what must be emphasized as “snag” management in the prescriptions.

Harvest in riparian allocation:

The FEIS continues to include harvest of snags within MA12. In the Robert Fire area you state that the majority of the proposed harvest is along an open road so we have no major concern with this harvest since the snags would eventually be harvested by firewood cutters. However, in the

Wedge Canyon Fire area, the majority is not along an open road (pg 3-135). The argument that the proposed harvest is a small percentage of the snag habitat does not change the fact that removal of any snags is reducing the snag habitat available and maintenance of snag habitat is one of the requirements of MA12. It does not follow that MA 12 direction is being met as stated on page 3-165.

Grizzly Bear/Access Management:

We were glad to see that many of our comments regarding the DEIS were addressed in the FEIS. It was pleasant to see that you revised the FEIS somewhat to clarify that the “existing” situation actually included several decisions that have not been implemented on the ground although the A19 numbers presented in the grizzly bear analysis still don’t show what actually exists on the ground in 2003 or 2004. It was also nice to see the clarification that all temporary and existing non-system roads to be used were accounted for in the A19 calculations.

Minor/major activities:

We commented on the DEIS incorrectly categorizing harvest of multiple small units as “minor” activities and how they should be considered “major” activities and included in the cumulative effects analysis and A19 calculations. In the FEIS there are only tables of “major” activities with no mention of what “minor” activities may be happening. What happened to all the units categorized as “minor” activities in the DEIS? If the Response to Comment #160 is supposed to respond to our comments, it is totally inadequate and does not address the issues raised.

During project numbers:

We were glad to see that it was easier to find the “during project” A19 numbers in the FEIS, and the summary section on page 3-205 described how the “during” activities contribute to the effects.

Helicopter logging in Security Core:

The responses to comments concerning helicopter logging in Security Core demonstrate that the Flathead Forest still resists adequately displaying the true effects on grizzly bears. You acknowledge that helicopter logging in Security Core during the non-denning season affects grizzly bears yet you fail to use the best and perhaps only technique to measure such effects. That technique is of course the A19 process whereby the effect of motorized activities on core is quantified.. The fact that managers generally have resisted addressing or including aerial motorized activities in effects analysis does not prevent the Flathead Forest from using the best available technique to describe the effects of helicopter logging.

How to pay for access management:

The response to comments and the discussion on page 2-31 concerning how access management would be funded is full of uncertainties and “weasel” words and does not commit the Forest to any schedule or disclose any firm funding. We can only hope that the salvage sale receipts are sufficient to finance the proposed road decommissioning, but if this does not happen it appears to be another example of completing the timber harvest but putting off the other forest plan requirement (access/grizzly management) indefinitely or perhaps forever.

Noxious Weeds:

We were pleased with the treatment of noxious weeds in the FEIS and the clear description of planned prevention and treatment.

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