



To: Bryan Donner, Planning Team Leader
West Side Reservoir Post-Fire Project DEIS
Tally Lake Ranger District
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Comments on West Side Reservoir Post-Fire Project DEIS from Flathead Audubon Society

Our comments fall in several categories including cavity habitat/snag management; black-backed woodpeckers; harvest in riparian areas, RHCA's, and other non-timber Forest Plan allocations; old growth, grizzly bear habitat management; access management; and noxious weeds.

Flathead Audubon Society also submitted comments during the scoping process.

Cavity Habitat/Snag management

It appears that many of our comments and concerns identified in the scoping process were addressed in the DEIS and we are grateful for that. However, there are still concerns with cavity habitat/snag management and black-backed woodpeckers that require further comment.

In general, it appears that Alternative C is the best of the alternatives to respond to the concerns of Flathead Audubon although it still has some problems. Alternative C provides the most snag/downed wood/old growth/black-backed woodpecker habitat of any alternative with harvest. However, the proposed snag management is to leave snags larger than 20, 22, or 25 inches dbh depending on the area and species. This is contrary to the literature from Lisa Bate that we submitted showing that snags 17 inches and larger are the important habitat component. The snag management prescriptions should be modified to retain larch and ponderosa pine snags 18 inches dbh and greater and Douglas-fir snags 20 inches dbh and greater. This recommendation itself is a concession from fully retaining snag habitat. It is noted that the DEIS uses 17 inch dbh in the old growth analysis.

Another problem is that it is difficult to determine if there will be any patches of large snags left outside proposed harvest units or not. It is important to retain unharvested patches of large snags well distributed throughout the fire area.

Reserve patches retained within harvest units need to be specified to be interior patches otherwise they are just part of the surrounding area and don't meet the intent of providing snag habitat "within" harvested areas.

The importance of large larch and Douglas-fir snags for nesting habitat was clearly described in Lisa Bate's comments and the literature she provided. However, these species and large diameter specimens may not exist over all of the proposed harvest units. Foraging habitat is often provided by these other species and smaller diameters. Where large larch and Douglas-fir snags do not exist, other species and/or smaller diameters should be retained according to a preference scale that your wildlife biologists can prepare. The largest diameter snags provide the best habitat for a variety of species but where they do not exist in sufficient numbers, smaller diameter snags should be provided.

All deciduous tree species snags should be retained regardless of size. Cottonwood and aspen snags provide high quality nesting and feeding habitat wherever they occur. The DEIS does not appear to contain any direction for retention of smaller diameter snags where large diameters do not occur nor direction to retain all deciduous snags, so the DEIS should be amended to include such direction.

Some OSHA standards concerning snags are also a concern. Right now OSHA standards requires cutting all snags in work areas that are not Class 1 or 2. For larch snags this should be relaxed because even a live larch tree with heart rot (Class 3) can remain standing for hundreds of years. They do not pose the same risk as a fir or spruce in Class 3.

On page 3-256 it is stated that snags within 300 feet of streams, rivers, and lakes are protected from firewood cutting on the Flathead National Forest. This gives readers an unrealistic expectation because firewood cutters often ignore this regulation and law enforcement is inadequate to insure the protection of snags. It should be recognized that firewood cutting will take snags along roads regardless of firewood permit regulations.

Given the intent of Alternative C, it does not make sense that Alternative C should have equal or fewer acres of high and moderate snag emphasis levels than does Alternative B in the Doe, Ball, and Blackfoot fires (Table 3-88).

Black-backed woodpecker

While it appears that black-backed woodpecker habitat has been considered and suitable habitat would be retained in more than ½ of what was created by the fires, the analysis still leaves several questions.

Page 3-335 refers to the fires creating moderate to high quality habitat; however, there are no definitions of moderate and high. Tables 3-106 and 3-107 do not differentiate between harvest in moderate and high quality habitat. It is important to know what portion of the high quality habitat would be retained versus the moderate quality habitat. In other words, is the salvage harvest concentrated in the high quality habitat leaving the lesser quality habitat to make the acreage numbers look better?

The proposed harvests in the Ball and Beta-Doris fires would not retain even 1 block of suitable habitat larger than 956 acres which does not follow the recommendations of Wisdom et al. (2000), yet the statement is made on page 3-338 that the recommendations are met. Suitable large blocks of habitat should be retained in each fire.

Also it is not clear whether any of the salvage units are still counted as suitable habitat. The literature cited on page 3-337 (Hejl and McFadzen 2000) shows that any level of salvage virtually eliminates black-backed woodpecker use. Therefore, no salvage units should be counted toward black-backed woodpecker habitat.

Harvest in riparian areas and other non-timber forest plan allocations

The proposed action states on page 1-5 that activities would take place within a number of Management Areas including 2A, 2B, and 12. Nowhere in the DEIS is the type, location, or extent of activity in these management areas described.

Flathead Audubon Society still has the same concerns as we stated in our scoping comments.

Any proposed harvest in MA12 riparian areas is a concern. It is highly unlikely that any harvest in these areas will contribute to meeting the intent of these areas to provide high quality wildlife, fisheries, and water quality values. Removing snags can only reduce cavity nesting and foraging habitat availability, reduce the trees available to produce beneficial large woody debris in the riparian zone, and increase soil disturbance that leads to sediment movement into streams. Given the thousands of acres burned in the uplands being considered for salvage it seems unnecessary to even consider the riparian areas.

The proposed harvests in MA's 2A and 2B are also concerns. It is highly unlikely that any harvest in these MA's will contribute to meeting the intent of maintaining unroaded lands for semi-primitive recreation and also the harvest would reduce the cavity habitat values created by the fires.

The Proposed Action and Chapter 2 are silent on whether RHCA's have any proposed harvest or not. Flathead Audubon Society has the same concerns for any proposed harvest in RHCA's as stated for proposed harvest in MA12.

Old Growth

Alternative C is by far the best at recognizing the ecosystem values of burned old growth and reducing proposed harvest within it. Fragmentation of the remaining stands with large, dead trees, and other old growth characters would be minimized under this alternative.

Grizzly Bear Habitat Management

On page 2-2 in Project Design Features, a 100' buffer on avalanche chutes is discussed. While the importance of avalanche chutes to grizzly bears is well documented, what is the basis for using only a 100' buffer? Even in green timber which provides much better visual screening, 300' is typically required to provide adequate hiding cover. It very likely would have to be even wider in burned timber.

Access management

Flathead Audubon Society is glad to see that two of the alternatives include proposals to achieve Forest Plan Standards. Alternative C's emphasis on closing motorized trails rather than roads is a reasonable approach that should be used.

Flathead Audubon Society is also glad to see that there are no proposals to call many smaller harvest units "minor" and try to exclude them from the effects analysis on grizzly bears.

The analyses presented in the action alternatives have several serious flaws that need corrected.

Nowhere in the DEIS are the "during" project A19 numbers mentioned or presented. Only the A19 numbers for the existing situation and what may eventually happen if funding and priorities allow are given. The "during" numbers disclose the real effects of conducting the salvage activities during the salvage and are equally important as the numbers that may eventually be achieved post-project because the salvage activities elevate road densities and reduce security core from the existing conditions and will maintain these reduced levels of grizzly bear security for several years. By showing the "during" numbers the true effects of the proposed salvage would be shown to be that all subunits involved (none of which currently meet Forest Plan Standards) would be reduced farther below standards for several years before any improvements were made (if funding allows). The effects of BMP work, pre-sale, and other high levels of administrative use need to also be combined with the proposed salvage then calculated to show the true cumulative effects of all concurrent activities while they are actually taking place.

Failing to acknowledge and display a reduction in security core when conducting helicopter logging in security core during the non-denning season is a serious flaw. There is no science basis for saying it doesn't affect security core values. The "environmental" effects are supposed to be disclosed in a DEIS.

The DEIS does not include any firm commitments to achieve the A19 standards as proposed for any alternative. This is the same issue we commented on during the scoping process. The access management should be as much a reality as salvage harvest and occur concurrently or within a compressed timeframe as salvage harvest is completed. The salvage harvest is a certainty to occur and will reduce grizzly bear habitat values for several years, but there is no assurance of long term improvement to help offset the direct effect of reductions due to salvage harvest. The Flathead Forest has a history of not achieving access standards even where decisions have been made.

Where will the money come from for any access management? The Moose and Spotted Beetle Projects that are existing firm commitments already consume virtually the entire Flathead Forest road decommissioning budget so where would the money come from to do any work on West-Side Reservoir? When this project is combined with other fire salvage projects on the Forest, the likelihood of having funding for proposed access management becomes even less likely. KV funding from salvage sales is highly unlikely to provide sufficient funding.

How does the proposed harvest in the Ball Fire affect the previous decisions and firm commitments made in the Spotted Beetle Decision? It is a concern that proposed fire salvage

would delay implementation of the Spotted Beetle Decision to achieve Forest Plan standards in Kah Soldier grizzly bear subunit.

Why is the Ball Branch subunit proposed to go well beyond Forest Plan standards for access management? Such actions are sure to further antagonize those who object to decreased levels of motorized access even though needed to achieve Forest Plan standards.

Noxious Weeds

The DEIS contains a good description of the proposal for noxious weed management. Flathead Audubon Society encourages close adherence to the management described.

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