



To: Bryan Donner
Tally Lake Ranger District
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

January 12, 2008

Comments on Proposed Sheppard Creek Post-Fire Project from Flathead Audubon Society

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. We have reviewed your December 14, 2007 letter describing the proposed action and wish you to consider the following comments and questions.

The proposed project as described appears to be entirely one-dimensional, namely salvage of burned trees, with virtually no mention of other resources in the project area or how they would be managed or affected. This is a concern to Flathead Audubon Society (FAS).

Cavity habitat/snag management and large woody debris is vital to many wildlife species and are an important issue for FAS. It is critical that ample snags of sufficient (large) size, numbers, and distribution are retained and protected to insure more than "minimum" habitat conditions. What provisions are planned to maintain and improve these vital wildlife habitat components? What Forest Plan direction applies and how would it be met?

What portion of proposed harvest units are in areas that have been previously harvested and what portion would be in areas that had no previous harvest? Would the proposed harvest be removing the few large trees left from previous harvest activities? Such remaining trees are critical for a legacy from the previous stands even if they are fire-killed now. If 56% of the project area has previously been harvested (mostly with stand replacement) what will the number be after this proposed harvest?

Why is any cutting proposed in MA12 (riparian areas) when one of the salvage criteria (Proposed Action page 7) was "outside riparian areas"?

What is the old-growth status within the Project Area and how does it comply with Forest Plan standards? Where does the old growth physically occur? The relationship to proposed treatments is important. Which proposed harvest units are in burned old growth? If old growth is deficient there should be a component of the proposal to improve the amount, quality, and distribution.

Motorized access management is very important for a variety of reasons including protection of snag and cavity habitat, big game and other wildlife security, water quality, and noxious weed management. The proposal has no mention of access management other than about 26 miles of new temporary and historic roads would be used and rehabilitated. What would rehab of temp roads consist of and when would completion be reliably expected? What steps would be taken to insure rehabilitated roads are not usable for motorized access? What adjustments to the existing motorized access routes will be made? This project should be used as an opportunity to adjust the motorized access routes in the project area to correct water quality problems, improve wildlife and wildlife habitat security, and help reduce the spread of noxious weeds.

The proposed project map shows a very large number of existing roads as would be expected since 56% of the area has previously been harvested. FAS strongly encourages the Forest Service to explore ways to use the existing road system for salvage activities and further reduce the proposed temporary road construction.

There was no mention of noxious weeds in the proposal. What steps will be taken to reduce existing infestations of noxious weeds and prevent additional infestations? Control of noxious weeds is vital to maintaining functioning, native systems.

What kind of fisheries occurs in the project area and how will the proposed harvest affect stream channels, stream flows, water quality, aquatic insects, and fish populations?

The proposed action made no mention of big game species and their habitat or any management for them. What Forest Plan direction applies here? Management of big game species for their security and the arrangement of hiding and thermal cover and forage is an important issue both biologically and socially regardless of any Forest Plan direction or lack thereof.

The proposed action made no mention of sensitive species such as goshawks and black-backed woodpeckers or any federally listed Threatened and Endangered Species. The project should have management specifically designed to maintain and improve populations and habitat for all species currently listed as sensitive or Threatened and Endangered.

Thank you for your careful consideration of our comments.

Lewis Young
Conservation Chair
Flathead Audubon Society
50 Garrison Drive
Eureka, Mt 59917