



Flathead Audubon Society

**PO Box 9173
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To: Bryan Donner
Project Leader
Tally Lake Ranger District
Flathead National Forest

March 8, 2007

**Comments on Proposed Ashley-Herrig Resource Management 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 February 9, 2007 letter describing the proposed project.

We support the proposed fish habitat and watershed improvement projects. Reduction of sediment entering the streams, lakes, and wetlands due to roads and motorized access is important as is removing barriers to fish movements.

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. If old growth is deficient there should be a component of the proposal to improve the amount, quality, and distribution.

The maps you supplied show that a maze of roads already exist in the project area. We question the need for any new permanent roads. Obtaining easement across existing private roads or using temporary roads would appear to provide any needed access.

With the existing amount of roads on FS land why aren't more roads proposed for decommissioning to improve fisheries and watershed conditions and to improve wildlife security? The proposal states that elk security is lacking in the area. Many other species benefit from security as well.

The proposal to create additional OHV/ATV trails at the expense of wildlife security is particularly troubling. The proposal states that the proposed new OHV/ATV trail would be created from roads currently closed for wildlife security. Your maps show that one designated ATV trail already exists. If a loop ride is desired the users can utilize street-legal machines and ride on existing open roads. Lack of effective enforcement of existing regulations concerning off road motorized use does not constitute a need to

further reduce wildlife security and increase sediment production by creating new authorized routes.

Cavity habitat/snag management and large woody debris is vital to many wildlife species. What provisions are planned to maintain and improve these vital wildlife habitat components?

How does all the proposed vegetation management comply with lynx habitat management standards since dense stands of seedlings and saplings are an important lynx habitat component?

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?

We question the need to harvest timber solely to soften the visual impact between clearcut private lands and Forest Service lands. The Forest Service did not create the "hard edge" so should be under no obligation to fix them. It is okay for the public to see the difference between private land management and Forest management.

Thank you for your careful consideration of our comments.

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