

Swan View Coalition *Nature and Human Nature on the Same Path*



3165 Foothill Road, Kalispell, MT 59901

swanview.org & swanrange.org

ph/fax 406-755-1379

December 18, 2014

Nick Aschenwald
DNRC
655 Timberwolf Parkway
Kalispell, MT 59901
Via email to naschenwald@mt.gov

Re: Comments on Birch Creek salvage "sanitation" permit EA

Dear Nick;

As we suspected from the beginning, as noted in our October 20 letter, and as confirmed in your email of December 9 (attached) and the EA, this was more than a mere "salvage" proposal and is now being called "sanitation" so the logging can include more green trees. While we appreciate that DNRC invited public comment, posted the EA and invited public comment again, it appears DNRC is intent upon removing some 55 truck loads of logs rather than making reasonable changes in response to public comments.

The single favorable change in response to public comment we are able to find is that DNRC has agreed to mark the trees for cutting rather than leaving it at the discretion of Stoltze. Thank you.

While the EA notes that DNRC heard from some 50 people with concern over the trails, aesthetics, goshawks, and grizzly bears, DNRC nonetheless intends to log the lower area containing both trails, including where goshawk have been documented to nest.

DNRC has omitted the upper half of the logging area while still targeting the same logging volume - which would roughly double the cutting in the remaining logging area. This of course appears disingenuous and aimed at achieving logging targets rather than lessening impacts to the trails and surrounding area.

The EA, at 4, states the upper half of the original logging area was dropped because, "due to operability limitations it wasn't feasible to complete all of the acres." Well, the southern part of the logging area dismissed was the area we suggested in our October 20 letter could be logged out of sight of the trails and without crossing them to skid logs to the Stoltze roads. So much for reducing the logging area - and logging volume - in a way that responds to public comment.

We don't understand why most of this area of Landtype 78, which appears to require cable yarding, was dismissed "due to operability limitations" while a small portion of it is retained along with some Landtype 26A-9, which also appears to require cable yarding (EA at 35 and 37). To add to the confusion, Dave Poukish on December 12 emailed that his understanding is that skidding/yarding will be accomplished "using rubber tire or track type machines." We've not heard from Nick Aschenwald or Pete Seigmund to either confirm or correct this understanding. So, we are left with the EA on page 7 saying DNRC/Stoltze would "skid with a cable machine reducing the amount of impact on the ground," while pages 33 and 39 appear to allow "ground based yarding methods." (See our and Poukish's email thread, attached).

What's missing from the EA is a concise, clear description of what is proposed and how it responds to public comment and resource issues. It instead provides conflicting descriptions of the proposal and simply explains away the public and resource issues.

We're certainly not suggesting the upper half of the logging area be reinstated, but we are certainly scratching our heads at why the one area that could be logged without crossing the trails to reach Stoltze roads has been dismissed and the logging volume essentially doubled in the area containing both trails, the prior goshawk nest site, and the most public controversy. On the other hand, the simple answer appears to be "we're going to log what trees we can where the logging is easiest in order to get the cut out, public concerns be damned."

Summary

Doubling the logging volume along these trails and switching from "salvage" to "sanitation" to accomplish it adds insult to injury. For the reasons detailed above and in our October 20 letter, we urge you to select the "No Action" alternative in order to honor DNRC's 2006 agreement to protect Broken Leg Trail #544. The EA certainly provides no action alternative that would protect the Crater Notch and Broken Leg trail experiences while allowing for a limited amount of logging.

Please keep us posted on this proposal. Will a decision on it need to go before the Land Board or not?

Sincerely,



Keith J. Hammer
Chair

Cc via email: Dave Poukish, Pete Seigmund, Greg Poncin, Steve Frye

"Aschenwald, Nicholas" <NAschenwald@mt.gov>

December 9, 2014 12:13 PM

To: Keith Hammer <keith@swanview.org>

Cc: "Poukish, Dave" <dpoukish@mt.gov>, "Seigmund, Peter" <pseigmund@mt.gov>

RE: Birch Creek Salvage

Keith,

Thanks for your comment regarding our draft EA checklist.

- This permit has become a Salvage/Sanitization. The original concept for this project was to salvage only the dead and dying trees within the project area. As we go through the MEPA process the project development stage uses the issues from the public and the stand environment to develop a project that is best for the resource and the trust beneficiaries. The sanitation portion of this project brings in the idea that the vegetation in this area will grow healthier for future generations. This means this proposal will treat fewer acres but will remove more volume from those acres. We are salvaging some of the dead timber, and we are sanitizing some of the green timber that is infested with insects and disease issues. The proposal describes that green trees within the 48 acres we will be marked.
- For analysis purposes the Hydrologist analyzed for the highest impacted areas of this harvest unit, which is expected to be to remove 50% of the merchantable volume. To the extent practical no sub merchantable volume will be removed.
- The current stand density is estimated at 12-15 mbf per acre. Between the salvage and the sanitization we don't expect to remove more than 4-5 mbf per acre.
- The proposed total volume of 250mbf is an estimate.

If you have any other questions please let me know.

-Nick Aschenwald

Forester

DNRC

406-751-2264

From: Keith Hammer [mailto:keith@swanview.org]

Sent: Tuesday, December 09, 2014 10:53 AM

To: Aschenwald, Nicholas
Cc: Poukish, Dave; Seigmund, Peter
Subject: Re: Birch Creek Salvage

Nick, Dave and Pete;

Thanks for posting the EA and inviting public comment.

We see the harvest area has been halved but the salvage volume remains at 250MBF. Why does the salvage volume estimate not also drop by about half?

The EA says about half of the standing timber will be removed (page 5). What is the current stand density and what is the proposed stand density?

We've never gotten an answer to this in our previous emails and we don't find the answer in the EA, though we admit we've had time to only scan it twice. Please provide this answer ASAP or point to the pages in the EA where it is provided.

Thanks,

Keith

Keith Hammer - Chair
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<http://www.youtube.com/user/swanviewcoalition>

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On Dec 9, 2014, at 10:12 AM, "Aschenwald, Nicholas" <NASchenwald@mt.gov> wrote:

Birch Creek Salvage

The EA Checklist is now available on

line. <http://dnrc.mt.gov/EnvironmentalDocuments/Default.asp>

We are having a 10 day comment period.

Please have all comments completed by 12/19/2014.

Thank you,

-Nick Aschenwald

Forester

DNRC

406-751-2264

naschenwald@mt.gov

December 12, 2014 9:23 AM

"Poukish, Dave" <dpoukish@mt.gov> 
To: Keith Hammer <keith@swanview.org>, "Aschenwald, Nicholas"
<NAschenwald@mt.gov>
Cc: "Seigmund, Peter" <pseigmund@mt.gov>
RE: Birch Creek Salvage

1 Attachment, 11 KB

Greetings Keith,

Nick and Pete are off today and will not be able to get back to you until early next week regarding your question. I do not anticipate any high-lead or overhead cable system being used for forwarding material. I believe that skidding will be completed using rubber tire or track type machines and would be done on snow covered/ frozen ground during the winter months. I will let Nick and Pete verify this when they return to the office. Hope you are enjoying the holidays.

Regards,
Dave

Dave Poukish
MT DNRC - Kalispell Unit
Unit Manager
655 Timberwolf Pkwy Ste 2
Kalispell, MT 59901-1215
dpoukish@mt.gov
(406) 751-2263



From: Keith Hammer [mailto:keith@swanview.org]
Sent: Thursday, December 11, 2014 11:54 AM
To: Aschenwald, Nicholas
Cc: Poukish, Dave; Seigmund, Peter
Subject: Re: Birch Creek Salvage

Nick, Dave and Pete;

Another question on the Birch Creek EA:

Would skidding use rubber tire or track machines, or will it be a high-lead or other overhead type cable system that partially suspends the logs?

Page 7 says "skid with a cable machine reducing the amount of impact on the ground."

Pages 33 and 39 refer to "ground based yarding methods" and "ground-based units," respectively, while the Soil Map Unit table on page 37 appears to require "cable" yarding equipment on Landtype 26A-9.

So, we are confused and would appreciate a reply ASAP.

Thanks, and thanks for Nick's clarifications on Dec. 9 as well.

Keith

Keith Hammer - Chair

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Thank you,

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