

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



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June 27, 2012

Marsha Moore
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Re: Larch Cone Collection via PDF to comments-northern-flathead@fs.fed.us

Dear Ms. Moore;

While we appreciate Flathead National Forest has revised its Larch Cone Collection Project to “consider using non-lethal methods,” this is far from **requiring** the use of non-lethal methods. A full 97% of the folks commenting on your proposal to fell/kill the seed trees opposed such lethal methods. Nearly all suggested non-lethal methods.

Your June 5 letter, however, considers only the use of a lift truck – and then only under exceedingly narrow circumstances. You fail to mention you were contacted by Fandrich Cone Harvesters and encouraged to utilize their helicopter-borne cone collector, which allows your pilots to “get as many cones as you want without damaging trees.”

Nor does your letter discuss other traditional non-lethal methods like tree climbing, even though the National Fire Plan Cone Collection for Post-Fire Reforestation and Restoration in Montana 2002 is considered a success - wherein “Contractors collect the majority of the cones; climbing trees selected for their genetic qualities.”
(<http://www.forestsandrangelands.gov/success/documents/36-44-en.pdf>)

Moreover, the Forest Service’s Missoula Technology and Development Center duly notes “Tree climbing is one of the oldest methods for cone collection and the least destructive.” It goes on to describe the safe way to climb trees and collect cones, then compares this to other methods, mostly non-lethal. When discussing tree felling, the Center notes only cones that don’t hit the ground can be used. So, how many cones are wasted by falling the entire tree to the ground?
(<http://www.fs.fed.us/t-d/seedlings/conecoll/colmeth.htm>)

A full range of non-lethal methods require full discussion **prior** to asking the public to comment again on your proposal. If you are waiting until after you’ve published a final decision to provide this discussion, then it will be too late for public comment and the wasteful process of filing administrative appeals will be the only recourse.

You’ve missed a golden opportunity thus far to take public comment seriously and respond to all suggestions of non-lethal cone collection. You’ve instead made a straw

man of using lift trucks, then focused on those shortcomings rather than focus on the other non-lethal methods that can be used where lift trucks cannot gain access to seed trees.

We also note your letter does not make clear that your reduction in the estimated number of trees needed for cone collection, down from 270 to 150, is due solely to errors in the initial estimate, not an effort to reduce impacts by reducing the number of trees used.

We again urge you to use an array of non-lethal methods to collect larch cones. Killing the trees is absolutely unnecessary.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and slightly slanted to the right.

Keith J. Hammer
Chair