

Swan View Coalition Nature and Human Nature on the Same Path



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

Re: Comments on Birch Creek salvage permit proposal

Dear Nick;

We've waited to the last moment to send this letter, hoping we'd hear from you regarding what you estimate to be the current number of trees and standing timber volume per acre in the Birch Creek salvage proposal area, but have not heard from you in this regard. We made this request in our email of October 9 and Dave Poukish indicated in his response that you would provide us those numbers.

So we'll have to comment based on what we know. If you'd like our comments to be better informed, please grant the public a reasonable comment period on the EA and include the requested numbers in the EA. In fact, that would be a good idea in general and we hereby request such a comment period on the EA.

Prior Promises and Invites to "Collaborate"

In his letter of May 11, 2006, Greg Poncin agreed to protect the Broken Leg Trail #544 and its junction with the Crater Notch Trail by moving the Foothills Timber Sale logging unit downhill and out of site of the trails. His letter included an invite to try to "carry this same collaboration over" to try and resolve other logging issues. It leaves us somewhat perplexed to now be faced with a logging proposal that focuses precisely on logging these two trail corridors with little room to "collaborate."

As we explain in the remainder of this letter, the only compromise we could propose and support would be to limit the salvage to areas out of sight of these two trails and that can be yarded directly to Stoltz's roads without crossing either trail. We simply cannot agree to the proposed salvage for the reasons presented below.

Integrity of the Trails and Hiking Experience

While we understand that DNRC retains the right to log these trail corridors in the trail easements granted the Forest Service, that does not mean it is either the right or acceptable thing to do. These trails were designated non-motorized by the Forest Service in 1988, after long and hard-fought public battles to conserve their pristine qualities and aesthetic beauty - and we appreciate DNRC's decision in 2006 to protect those qualities.

These are trails that provide public access to Jewel Basin and are used by, among others, people who want to walk their dogs off-leash prior to placing them on-leash at the Jewel Basin boundary. The Broken Leg Trail in particular offers an easily accessible trail of modest incline for folks of all ages to enjoy, from toddlers to the elderly. These trails in this proposed salvage area offer some of the earliest Spring hiking due to their low elevation, somewhat southern exposure, and the lower snow pack due to snow interception in the closed forest canopy.

If it is the intent of DNRC or Stoltze to highlight the positive effects of logging in this area, the results are already easy to view on the drive to the Broken Leg trail-head or along the section of that trail that passes through Stoltze's quarter-section as a logging road. Indeed, it is the natural processes of tree death and decay that adds to these trail experiences as folks have watched woodpeckers and other birds feed and nest in old trees, including the goshawk nest that fledged young within sight of the Broken Leg Trail during the planning of the Foothills Timber Sale.

The logging proposal will harm these trails and the experience of these trails in ways that would take many decades to recover - and then only if DNRC did not log them further. Now is the time to continue and strengthen DNRC's prior agreement to protect these trails with a sight-distance no-logging buffer on each side of the trails.

Old Trees, Goshawk and Other Wildlife

The lower portion of the proposed salvage area includes the area where a pair of goshawk fledged young from a nest during the time the Foothills Timber Sale was being planned, if not executed. The nest was just below the Broken Leg Trail and DNRC should protect this and other nearby habitat from logging for continued use by goshawk. (Please review the particulars in this regard in your Foothills Timber Sale EIS and conduct field reviews regarding goshawk habitat in this area).

This is also the lower area where Stoltze proposes to skid logs downhill to DNRC's road in the now clear-cut area. This narrow corridor along the Broken Leg Trail has already been impacted enough and in a way that may have diminished the use of the area by goshawk. It should neither be salvage logged nor skidded through.

Prohibiting logging in the trail corridors would not only protect their physical and aesthetic qualities, it would help retain old, dead and dying trees for wildlife adjacent to Stoltze's private quarter-section of land. Stoltze has already removed many such trees from its land and intends to remove more this winter. While DNRC may or may not be

required to retain old, dead and dying trees to help mitigate for the removal of them on Stoltze's land, it is simply the right thing to do.

We witnessed an elk shot dead on the switchback of the Stoltze logging road nearest the Crater Notch Trail. This elk was seen and shot from the Crater Notch Trail due to the ease of sight provided by the previous logging of the Stoltze land. This should serve as a reminder of how important hiding cover is to wildlife, which in this area includes threatened grizzly bear and lynx.

Salvage logging along these trails, to as few as 8-10 trees per acre in some areas according to Dave Poukish, will greatly decrease hiding cover and greatly increase opportunities for the shooting if not unlawful poaching of wildlife. Again, these trail corridors should provide hiding cover to help offset its reduction on neighboring Stoltze land, rather than have similar reductions in hiding cover on DNRC land as well.

Doubts and Insufficient Information

As stated at the outset of this letter, we've yet to be provided information regarding current trees and timber volume per acre in the salvage proposal area. So we are left to simply try and visualize removing some 55 truck loads of logs from this 100 acre proposal area. While Dave Poukish assures us that remaining tree densities of 8-10 trees per acre would be only in the most infected areas, we are nonetheless left to conclude the removal of 55 truck loads will be a significant reduction in the tree density.

Stoltze's salvage permit application cause us more concern, not less. On the one hand it proposes salvage of most tree species that "show signs of defoliating from the Budworm and bark beetle." Then again, the application claims Douglas fir with "multiple pitch streamers . . . indicate they are not far from being dead." I have Douglas fir on my property that have displayed multiple pitch streamers for decades without any other signs of "near death." They remain green, healthy and standing.

It is simply inappropriate to allow the unmarked salvage of trees Stoltze broadly describes as "showing signs of stress." More disturbing is when Stoltze's application lists "desirable trees to leave." This section of the application makes this sound more like a logging prescription intended to change the overall character of the forest rather than to pluck some "salvage" trees from it. If this section were to be consistent with the rest of the application, one would expect to find that all but the dead and nearly-dead trees would be desirable leave trees.

In the end, we must conclude that this logging proposal is not suitable for the areas within sight of the Broken Leg and Crater Notch Trails. If you intend to allow Stoltze to salvage log on DNRC lands, DNRC must first mark the trees to be cut and include a mark on the stump below cut level to help insure unintended trees are not inadvertently logged. While Stoltze is a reputable company, it is nonetheless inappropriate for DNRC to leave the logging of public trees up to the discretion of a private company. We ask that, if any salvage is further contemplated, that it only occur out of sight and on the Stoltze side of these trails where the logs can be yarded directly to the Stoltze logging road without crossing either trail.

We further urge you to not throw a bunch of marking paint around out there until you have satisfactorily resolved this proposal with the public - and then of course only if that resolution involves any salvage logging at all. The planning of the Foothill Timber Sale resulted in trees marked for cutting and then painted over to hide the first painting when the logging was moved downhill and out of sight. Those painted trees are still visible today along the Broken Leg Trail and the painting and flagging of property boundary trees has already greatly harmed the aesthetic experience of the Crater Notch Trail.

Winter Logging, Trail Damage and Skid Trails

While DNRC says the logging would occur during winter, Stoltze's permit application states "The hill where the affected Douglas fir are would be harvested on dry ground." So, which is it?

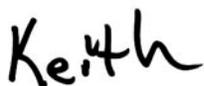
Even if logged on frozen ground during winter, the proposed feller-bunchers and grapple skidders would cause substantial trampling of non-targeted brush and smaller trees - further reducing current wildlife hiding cover and near-trail aesthetics. These machines, no matter how carefully operated on even frozen ground, will nonetheless damage the trail tread and prism with the multiple passes necessary to log some 55 trucks of logs.

Similarly, the logging would result in skid trails where downed trees have been pushed aside. This will leave skid trails that are not only unsightly, but would prove inviting to motorized vehicles and their operators wishing to run off-road. It has taken decades to get motorized use of these trails reduced and nearly eliminated in spite of their legal closure to such uses in 1988. The results of logging the area would be a giant step backward by providing easier non-trail-head access to these trails from existing logging roads.

Summary

In summary, we urge you to make a decision here that remains in the spirit of your 2006 decision to keep logging out of sight of the Broken Leg and Crater Notch Trails. If you must salvage, please keep it out of sight of the trails as described above.

Sincerely,



Keith J. Hammer
Chair

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