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

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August 10, 2020

Swan Lake Ranger District
Attn: Shelli Mavor
200 Ranger Station Road
Bigfork, MT 59911

Dept. of Natural Resources and Conservation
Attn: Pete Seigmund
655 Timberwolf Parkway
Kalispell, MT 59901

Re: Comments on proposed March Madness and Jewel Basin Salvage Projects
Submitted to comments-northern-flathead-swan-lake@usda.gov and pseigmund@mt.gov

Dear Folks at SLRD and DNRC;

Based on the recent logging by DNRC in Krause Basin and by SLRD along the Sixmile Lookout Trail, we ask that you conduct no salvage logging within sight of the Echo-Broken Leg, Crater Notch, Hall Lake, and Bond Creek trails. The logging we've seen is heavy-handed, careless and cannot with a straight face be called "fuels reduction," as the big logs that don't generally burn in a wildfire are being removed while the more flammable small trees and slash are being left behind.

We are disappointed to see SLRD wants to use DNRC under the 2014 Farm Bill's Good Neighbor Authority to help implement its March Madness logging project. The messes left behind in Krause Basin and on Sixmile Mtn. make DNRC and SLRD look like anything but good neighbors.

On the following page are two photos of what Krause Basin DNRC land looks like after it was recently "cleaned up" by logging:

Below is a photo of the adjacent forest with some blown-down trees that weren't "cleaned up" or "salvaged" by DNRC in Krause Basin:

Like many wildlife species, we prefer diverse forests with blown-down trees to the mess left by DNRC!

On the following page are two photos of the Sixmile Lookout Trail following logging under SLRD's "Weed Lake Landscape Restoration Project:"

Below is a photo of Sixmile's trailside forest prior to logging:

It's pretty obvious that the commercially valuable logs that resist fire were removed and the more flammable small trees and slash were left behind, even though being touted as "fuels reduction" logging. Like many wildlife species, we prefer the unlogged, diverse forest to the "restored landscape."

To add insult to injury, both DNRC and SLRD did unnecessary damage to residual trees in the haste to get commercially valuable logs to the mill. See photos on the next page:

The photo above shows damage caused by ground-based log skidding on DNRC's Krause Basin land. The photo below shows damage caused by line/cable yarding of logs along SLRD's Sixmile Lookout Trail.

We've already asked SLRD that it not "salvage" log blown-down and other trees in its March Madness proposal, especially along trails used by the public to enjoy the woods. We here repeat that request and ask that these public trails and the forests along them be fully protected. And, if SLRD installs any culverts or bridges in Patterson Creek, please remove them post-logging so they do not encourage motor vehicle trespass into the Peterson/Patterson/Bear Creek area from neighboring DNRC land on those closed Forest Service roads.

We've also already asked DNRC to not log within sight of the Echo-Broken Leg and Crater Notch trails (and we repeat that request here). We did so in our comments on the 2006 Foothills Timber Sale. DNRC's Greg Poncin responded favorably by moving logging units downhill and out of sight of the Echo-Broken Leg Trail. We made a similar request of DNRC's 2014 Birch Creek Salvage, but to no avail. F.H. Stoltze was instead permitted to take an estimated 55 loads of logs from DNRC lands around the Crater Notch trail via convenient access through its neighboring private lands.

So it concerns us that SLRD now wants to partner up with DNRC and perhaps let DNRC handle some of the March Madness contracting, as it did for the Flathead National Forest's Taylor Hellroaring timber sale, which was sold to F.H. Stoltze. (https://www.fs.usda.gov/detail/flathead/news-events/?cid=FSEPRD766894)
While the Forest Service, DNRC and F.H. Stoltze may consider themselves "good neighbors," they are all three being anything but good neighbors to the public whose trees they are logging and whose trails they are trashing!

The logging jobs DNRC and SLRD have done in Krause Basin, Birch Creek and on Sixmile Mountain demonstrate an unwillingness to keep logging out of sight of trails the public relies on to enjoy time in the woods. The photos we've included with this letter also demonstrate this logging is profiting from the removal of large tree trunks as logs while leaving the more flammable small trees and logging slash behind.

The logging you propose in your March Madness and Jewel Basin salvage projects will most certainly leave the woods looking worse and in poorer health than they are now. Invoking the Good Neighbor Authority will do nothing but sprinkle congressional holy water on the "good old boy" network that has resisted needed reform of public forest management for many, many decades.

It's time to protect public forests, even "damaged" ones, along with the public's ability to enjoy them. Your proposed cures under the guise of "salvage" and "fuels reduction" are worse than the "damage and disease" you profess to cure. It is simply unacceptable.

Sincerely,

Keith

Keith J. Hammer
Chair