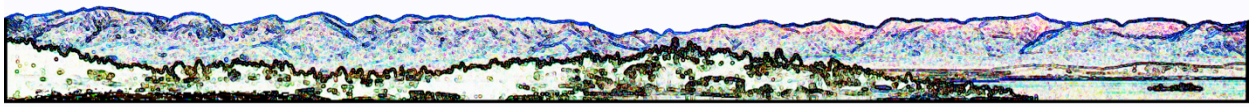
Swan View Coalition *Nature and Human Nature on the Same Path*



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June 2, 2020

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

Re: Further Comments on proposed March Madness Blowdown Salvage Project
Submitted to comments-northern-flathead-swan-lake@usda.gov

Dear Folks at SLRD;

We offer these further comments in the above regard after hiking the Hall Lake Trail from the trailhead to the Groom Creek crossing, hiking the Bond Creek Trail from Highway 83 to Bond Falls, and visiting the Beardance field tour site/logging unit. We did not attend the field tours in order to limit our potential exposure to COVID-19.

Both of our hikes confirmed that the worst of the blowdown is associated with the Sixmile Fuels Reduction units where the forest was previously thinned. We were, however, pleased to see the blowdown in the units between the Lower and Upper Bond Creek trailheads was not as severe in the middle portions as it was nearer the two trailheads. Much of that middle area in fact does not appear to fit any description as excessive fuel loading or fire hazard whatsoever - and we cringe at the thought of heavy equipment disturbing vegetation, soils and wet areas in order to run around and "salvage" widely scattered blowdown trees.

We are not familiar with the history of the proposed unit about a mile south of the Beardance trailhead, but it appears to have been thinned before? We see a lot of trees marked with orange paint, some downed and some still standing, and assume those were leave trees? It appears that the forest surrounding that unit had far less blowdown than within the unit.

We are well aware that topography and other factors affect the amount of blowdown, not just prior thinning. But we'd hope a lesson would be learned from the thinning done under the Sixmile Fuels Reduction Project. For example, it is pretty clear that thinning along and near ridge tops is a recipe for massive blowdown, as occurred near the Upper Bond trailhead.

Below is a photo taken 5/25/20 looking west down the Bond Creek Trail from the Upper Bond trailhead. It shows the effects of locating previous thinning units along the ridgeline:

Below we include two photos taken the same day from a single position on the Bond Creek Trail just as it starts dropping down to Bond Creek from the Upper Bond trailhead. The photos show significant blowdown in the previously thinning area to the left of the trail and virtually no blowdown on the un-thinned right side of the trail:

Below we include two photos taken 5/23/20 from the same position along the Hall Lake Trail. The top photo is looking into the previously thinned Unit 5 while the bottom photo is taken after turning around and looking back into the un-thinned forest:

We hope these further comments and photos help make clear the concerns we expressed in our May 22 letter. Removing logs salvaged from blowdown does little to reduce fire fuels as the fire-resistant trunk of the tree is removed and the flashier fine fuels in the limbs, tops and small trees are left behind. The proposed salvage logging will instead further the degradation of these forest stands begun by the prior logging via more logging, more soil disturbance, spreading of invasive weeds, and more removal of carbon stocks by large equipment.

Please keep us informed and provide us any summary of the field tours and public comments you may have.

Sincerely,

Keith J. Hammer
Chair