

November 19, 2003

Steve Slaughter
Ninemile Ranger District
20325 Remount Rd
Huson, MT 59846

RE: Proposed Fournier/Mill Creek Limited Timber Harvest and Proposed Quartz/McGinty Limited Timber Harvest

Dear Steve,

I'm sorry I wasn't able to get these comments to you sooner, but I wanted to make sure you them on hand.

On October 26, 2003 the Native Forest Network lead a public monitoring trip – attended by a dozen individuals – to the proposed Fournier/Mill Creek Limited Timber Harvest and proposed Quartz/McGinty Limited Timber Harvest, both on the Lolo National Forest.

What follows are my personal observations from that October 26, 2003 field trip:

Proposed Fournier/Mill Creek Limited Timber Harvest

Using the map of the Proposed Fournier/Mill Creek Limited Timber Harvest as a guide during our monitoring trip we walked around the perimeter and through the interior of the 63 acre area unit. In total, we spent three hours monitoring the site. Mainly we were looking for evidence of bark beetle infestation and wanted to get a fell for the forest type and the size and stocking of trees in the unit.

We observed very little evidence of bark beetle infestation or beetle killed trees. In total, we only found three small areas within the unit with bark beetle infestation, and these areas were limited to 5 to 10 trees in a small patch.

The unit is also located primarily on a west to north facing slope. The unit is also home to a number of springs (at one of the springs we found recent evidence of black bear activity, including a large pile of black bear scat). Because of the slope aspect and the presence of springs, the area was quite different than a south-facing forest at the same elevation. In other words, we do not believe that this forest historically was void of Douglas fir. In fact, I would argue that the forest has always had a significant Douglas fir component. The fact appears to be absent in the purpose and need for the project, which states “The desired condition is a healthy mixed species multi-cohort stand, with representation of seral species (ponderosa pine and western larch). . . .”

I have mentioned this concern to you in previous conversations regarding the Frenchtown Fact Project. My main concern is that by not acknowledging the fact that a major component of the current – and likely historical – forest on this particular aspect is/was Douglas fir the Douglas firs are simply regarding to as a “junk tree” that need to be removed (ie logged) to return the forest to a desired future condition.

I'm very concerned that in order to meet the objective of getting 250,000 board feet of timber from this 63 acre sit that the vast majority of it will come from Douglas Fir, and especially from Douglas fir in the higher end

(14-19 inches DBH) of the diameter range. This is unfortunate considering the fact that large trees overall are rare in this project area and Douglas fir – and ponderosa pine for that matter – in the 14-19 inch DBH range represent some of the larger trees on the site period.

I continue to question the wisdom of allowing the cutting of some of the larger trees in the forest (whether Douglas fir or ponderosa pine) if the goal is to return the forest to a more natural state. This is the same concern that I've had with the Frenchtown Face Project all along.

During our monitoring trip we also saw little evidence that this area was “overstocked” in general. We observed time and again that if any fuel reduction needed to be completed it should have been focused on the smaller diameter trees and shrubs and on prescribed burning. For example, we would support the part of this project that has to do with the prescribed burning. We would also support the removal of small roundwood in the 3-7 inch DBH range.

However, given what we observed at the unit, we cannot support the removal of small to medium sized sawtimber in the 7-19 inch DBH range due to the fact that trees in the upper end of this range are rare in this area (representing some of the larger trees period). Also removing these trees in the 7-19 inch DBH range seems completely unnecessary toward the goal of meeting the “forest health” objectives.

In other words, we feel that you can properly reduce fuels in the area and effectively accomplish your “forest health” objectives by focusing on the prescribed burning and removal of trees in the 3-7 in DBH range.

The other concerning aspect of the project which is needed only to cut the 7-19 in DBH sawtimber is the construction of 1/2 mile of a temporary road. The area is already home to plenty of roads and we think the idea of building a 1/2 mile of road is ridiculous. Also, per my phone conversation with you during the week of October 20th I got the impression that the road would be built very near the spot where we found some springs. If that's the case, that would obviously be unacceptable and cause for great concern.

Proposed Quartz/McGinty Limited Timber Harvest

As we arrived at the proposed Quartz/McGinty Limited Timber Harvest the thing that struck us most was the degraded state of the project area already and the degraded state of the Plum Creek lands in the immediate vicinity.

Again, we walked the entire project area on the monitoring trip, although we did feel as if the map to this area was a bit confusing at times. One thing that stuck out was the fact that this project area was very dry and we wondered what the impact would be of opening up the forest canopy even more.

The forest in this project area appears to have been severely degraded by past management activities, including logging and roadbuilding. We are concerned with what more logging is going to do to the health of the area.

Again, we didn't see evidence of a forest that was “overstocked.” What we observed were very few large trees of any specie. We also didn't observe any western larch in the project area, although western larch are listed along with ponderosa pine as the desired species in the area.

As with the other project, we would support the part of this project that has to do with the prescribed burning. We would also support the removal of small roundwood in the 3-7 inch DBH range. However, given what we observed at the unit, we cannot support the removal of small to medium sized sawtimber in the 7-19 inch DBH range due to the fact that trees in the upper end of this range are rare in this area (representing some of the larger trees period). Also removing these trees in the 7-19 inch DBH range seems completely unnecessary toward the goal of meeting the “forest health” objectives.

Thank you for your time. Feel free to contact me with any questions.

Sincerely,

Matthew Koehler
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