Category: Vegetation Composition, Size Class, and Structure

PC # 501

Public Concern: The Forest Service should identify controls on motorized use; choose non-chemical tools before herbicides and clearly show it's ability to control weed invasion and spread. Specific areas identified to reduce weeds:
BNF – SWBW
LNF – Petty Mtn., Blue Mtn., Rock Crk

Sample Statement:
We recommend that the Bitterroot NF identify controls on off-road motorized travel among the listed priorities on page 68 to control new noxious weed invasions (as well as to protect other resources). (4664.31)

Sample Statement:
Forest succession and weeds are fast limiting the forage base for deer, elk, bighorn sheep, and moose populations. We would expect the Forest to acknowledge in the Plan its ability to treat weeds and to set back succession with the various forest management activities, chemical applications, timber harvests and prescribed fire. (5245.3)

Sample Statement:
While hiking Blue Mountain one day this summer I met a man mapping weed areas. I asked about the saddle - he then told me all weed control was being done lower [elevations]. I invite you the visit the trail at, above 3. Below the saddle the infestation of knapweed is severe. I have noticed knapweed follows wheels - not feet. With all the budget cuts I am sure there is not enough money to handle current weed patches let alone new ones. (4256.2)

Sample Statement:
EPA encourages prioritization of management techniques that focus on non-chemical treatments first, with reliance on chemicals (herbicides) being the last resort. We suggest that a guideline be included to assure that water contamination concerns of herbicide usage be fully evaluated and mitigated, since herbicide drift into streams and wetlands' could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. (4664.53)

Sample Statement:
…this area [Petty Mountain IRA] possesses abundant native flora and minimal noxious weeds (after the first ? - ? mile of walking). This distance to lower weed occurrence corresponds almost exactly to where the trail becomes too steep and narrow for most illegal motorized use to continue. (4433.4)

PC # 503

Public Concern: The Forest Service should consider and disclose the effects of climate change and it's ability or inability to manage wildland fire.

Sample Statement:
The Proposed RFP fails to even consider the pervasive, and likely increasing, effects of climate change on the ecology of the Forest. Since your "desired conditions" are based on an unspoken expectation that climate change isn't happening, the commitment to "best available science" is already broken. (5293.2)

Sample Statement:

This topic becomes particularly relevant given the recent declaration from the Association of Fire Ecology that said " climate change will limit human's ability to manage wildland fire" and they "may become larger more quickly and be more difficult to manage?and are likely to occur more frequently?Land managers need?to adapt to this new reality" (4795.11)

Sample Statement:

As I read the Draft Plan, I see that little is said or suggested regarding the the effects on the forest due to climate change. (4793.2)

Sample Statement:

We do not see any acknowledgement of global warming in your calculations. This factor will probably prove to override most if not all others in all three named conditions. The absence of consideration of global warming makes the Proposed Plan obsolete before it gets started. (4990.12)

PC # 504

Public Concern: The Forest Service should modify vegetation DCs for species composition and not manage for range of variation due to:

1. **global warming**
2. **no statutory authority mandates conditions should reflect that time period**
3. **current uses didn't exist at that time**
4. **the scientific evidence is highly speculative**

Sample Statement:

"In order to continue providing habitat connectivity and patch sizes on National Forest system lands similar to that experienced historically, the Forest will maintain or restore landscape patterns to a condition similar to that expected under natural disturbance and succession regimes." How will historic conditions be determined? How will the Flathead take into account modern conditions that are affecting the forest such as fragmentation from other ownerships, drought and global warming? It is fallacy to believe that we can replicate historic conditions when other factors have changed or are changing the landscape. Perhaps in some places historic conditions can attempt to be replicated but where and how need to be addressed because this will not be the case everywhere. (4924.13)

Sample Statement:

We urge great caution against giving up on any species prematurely, but we are equally concerned that the agency, the environmental community, local families, industry lobbyists, and politicians maycling too long to conditions and species that are no longer realistic alternatives for western Montana. The approx. 10-15 year lifespan of Forest Plans being developed now will be in large part taken up with the question of identifying the most likely losers and the most likely winners under the new climatic regime.The continuing importance of wilderness:The absence of references to - and reckoning with - the influence of climate leaves the Forest Service vulnerable to painting an unrealistic picture of its management alternatives, and runs high risk of underestimating the real-world risks now emerged for species including but not limited to the western red cedar, Clark's Nutcracker, cutthroat trout, and grizzly bear. (4208.3)

Sample Statement:

We find the complete lack of any mention or consideration of global climate change to be a serious shortcoming of this plan. This is especially troubling given that the plan sets specific targets for vegetation conditions, yet those conditions seem an attempt to mimic a perceived condition of the past. For example, the Desired Future Conditions call for the distribution of living and dead trees to be "consistent with historic conditions." The same is said for tree densities and fuel conditions. If the consensus of local, national and world climate scientists can be believed, and if the documented climate trend in the Northern Rockies continues, the future will not be like the past. The plan should emphasize accepting the direction that nature will take and adjusting our expectations and demands to that condition, rather than continuing the destructive and wasteful century-long struggle against natural processes. This is particularly true with respect to Wilderness fire and fuels. In addition the likely effects of climate change need to inform actions designed to control weeds and other exotics. (4981.1)

Sample Statement:

Issue: In order to achieve ecological sustainability as the proposed alternative defines it, the ecological condition of the project area must be within the range of those found prior to European Settlement. 1. This standard is illegal and inappropriate under applicable law. First, legitimate multiple use activities such as timber harvest and mining rarely occurred on a large scale prior to European settlement. Thus, to achieve ecological sustainability, such activities must be excluded. This is a violation of the Organic Act, MUSYA, and NFMA. 2. Second, no statutory authority exists which mandates that ecological conditions of any kind must reflect pre-European settlement conditions. 3. Third, the assumption that ecological conditions prior to European settlement are better than conditions at any time since then is a purely subjective value judgment, and is not appropriate to consider during the planning process. 4. Finally, the scientific evidence which suggests what ecological conditions were like prior to European settlement is highly speculative. Basing all planning and management around a range of variability which can never be definitively determined is illusory, arbitrary and capricious and violates the Organic Act, MUSYA, and NFMA. (4911.13)

Sample Statement:

Desired future condition: The new climate will eliminate conditions that many may desire for these three forests. For example, current stands at lower elevations will plausibly be killed by the varied effects of global warming, and replaced by dry grasslands interspersed with anorthward/upslope expansion of the juniper population. In this same general scenario, western red cedar will be a thing of the past no matter what may be desired by existing/prospective homeowners,forest activists, weekend hikers, family picnickers, fishers and hunters, outfitters, real estate developers, or any the various industries which influence national forest policy. Snow loss andearlier greenup is equally inevitable under the new climatic regime, no matter what any of us may prefer. The three Forests have always had some ephemeral streams, and, like it or not, they will be having more of them as year-round flows are eliminated in some number of streams. (4208.1)

PC # 505

Public Concern: The Forest Service should increase the amount of acres suitable for harvest, increase access, and use mechanical treatment over fire as a tool:

1. to achieve Veg DCs,

2. reduce insects and disease, fuels, future fire severity, fire fighting costs and air quality impacts,

3. provide wood products and economic benefits,

4. restore fire regimes & forest health.

Sample Statement:

This [harvesting] could also cost us millions less in fighting forest fires and possibly save lives of those firefighters put in danger. I would like to see less slash burning when there is the ability to chip or use this material for a good use. (4259.3)

Sample Statement:

The plan recognizes the need to increase early serial conditions across the forest, yet you have reduced the area that mechanical and commercial treatments are acceptable by over 50%! Use of fire is not an acceptable tool in many of the management areas due to other resource and social constraints. We urge you to re-visit the land use designations to consider timber harvest and mechanical treatment on more acres to meet your desired future condition across more of the land use designations to considered future condition across more of the landscape, including areas where timber production is not a primary consideration, but where vegetation management is required to meet other land use objectives. (4768.2)

Sample Statement:

We believe most forest professionals recognize that the frequency of intense wildfires is increasing as a result of past fire suppression practices and the elimination of large-scale timber harvests. As a result, our forest is severely overgrown with shade tolerant species and heavily loaded with forest floor fuels. Thus when fires start, they tend to be intense wildfires rather than the more damaging to the environment (air & water quality) than all the roads and logging activities can possibly contribute. The Plan should sharply focus on this issue and preserve the opportunity to initiate large-scale forest restoration projects. Sapphire Geographic Area: It is irresponsible management practice to take any area of the forest with high fuel loads and shade tolerant species and declare it to be off-limits to motorized access. This is a certain prescription of intense wildfire. The Stony Mountain Recommended Wilderness 1.2 should be reclassified as Moderate Intensity management 4.1 to preserve the option for practicing Forest Restoration projects in this area. In Ch.2-Strategy Program Emphasis: We believe that restoring historical fire regimes to the forest should be a major objective, and that the practice of Restoration forestry on a large scale should be a strategy to achieve that objective. Vegetative Composition, Size Class, and Structure: The use of under story prescribed or natural fire is only possible when pre-existing fuel loading permits the fire to proceed without blowing up into an intense wildfire. In most cases, mechanical treatments are required. We believe that widespread use of mechanical treatments should be specifically emphasized in the Plan. (4079.2)

Sample Statement:
Strong and hard consideration should be looked at for mechanical treatments over burning. Restoration logging can mimic fire, produce income, provide natural resurce products, and not aggravate health problems, risk human life, damage water quality, reduce recreational uses, and destroy infrastructure. With mechanical harvesting we can use science based silvicultural prescriptions such as Dr. Karl Fiedler and Steve Arno recommends restoring our forests. The FNF can use these methods to increase shade intolerant, fire-adapted and drought tolerant trees and reducing overall stocking densities. (4265.12)

PC # 506
Public Concern: The Forest Service should prioritize active management in WUI over Backcountry areas.

Sample Statement:
Active forest management should be emphasized in wildland urban interface areas and areas of high recreational use in order to reduce the potential for catastrophic wildfires. (5792.123)

Sample Statement:
I support your plan for wild fire use and prescribed burning for all areas except 6.1. Emphasis on fuels reduction within the wildland urban interface is a good plan. I would suggest you take this a step further and make it mandatory that these fuel reduction projects take place before any backcountry logging. It is fact that backcountry logging actually increases fire risk for several years so, it only makes sense that the community is protected first. (4431.6)

Sample Statement:
When discussing fire mitigation, keep it to the interface areas that actually, truly, would impact on towns. (4558.4)

Sample Statement:
The proposed plan indicates emphasis on fuel reduction within the wildland urban interface. This needs to occur prior to backcountry logging. Backcountry logging actually increase fire risk for several years. So it makes public/community safety sense to do the WUI first. In fact the WUI fuels reduction needs to occur independent of backcountry logging. (4146.12)

PC # 507
Public Concern: The Forest Service should not allow WFU in MA 4.1, 5.1 and 6.1 especially where lands are mixed ownership. Specific area mentioned: N. Fk FHD

Sample Statement:
Another concern is the increased reliance on wildland fire use in most management area designations. While we recognize that wildland fire use is an important tool to accomplish certain resource objectives, it is potentially problematic on lands where state and local governments have primary fire protection responsibilities or where there are mixed ownership patterns involving national forest lands and state and private lands. The process for wildland fire use and related decisions will need to be clearly understood by all parties prior to implementation of these plans. We are in the process of developing an informal group within DNRC and the USFS Regional Office to explore this issue, and are confident that a solution can be found that is acceptable to both parties. (5792.6)

Sample Statement:
We believe that wildland fire use is generally an inappropriate tool for application in the wildland-urban interface (WUI). Where it is considered in the WUI, there should be clearly delineated criteria that are established in the fire management plans. Finally, increased wildland fire use in medium and high intensity forest management areas seems incompatible with timber production objectives. The Flathead National Forest chose not to allow wildland fire use in Management Areas 4.1, 5.1, 5.2, and 6.1, and we encourage other forests to consider that option. (5792.7)

Sample Statement:
Wildland fire use should not be considered an option for moderate and high intensity general forest management lands [BNF Ch. 2, Pg. 101]. This is consistent with direction on the Flathead NF proposed plans. These management areas represent lands suitable for timber production where timber management should be an objective and trees considered as a resource value at risk. (5792.44)

PC # 508

Public Concern: The Forest Service should keep the strategy for harvest prescriptions that mimic natural fire regimes, increase shade-intolerant species, reduce overall density AND for each fire regime, establish thresholds, target based areas and trees per acre by species and sizeclass.

Sample Statement:
Silviculture PrescriptionsHarvest prescriptions should mimic some of the frequency and severity effects of natural fire regimes. I support strategies that include increasing shade intolerant, fire adapted, drought tolerant trees during regeneration periods. Reducing overall densities and increasing shade intolerant types during intermediate entries. I also support fire return intervals between regeneration periods on general forest lands that will be similar to the mean fire return interval for long-lived, shade tolerant species. Species diversity within stands will be increased through the retention of over story trees during regeneration periods, as will variability of tree densities and tree species during intermediate harvest. The Forest should establish thresholds, target based areas and trees per acre by species and size class composition for each fire regime. (4402.4)

Sample Statement:
The biological health of the Flathead National Forest remains a pervasive worry. The federal government has shown a consistent trend of disinvestment in its forestlands, and this neglect has had an effect on all of the benefits recreation, wild left water, and timber- that these lands provide. The draft Plan shows that half of your forested stand scale in a stand replacement fire regime and many have become homogenous with fire exclusion in the last century. Why no, at the very least, have a large-scale plan that involves the removal of shade tolerant and less favorable species to favor the more fire tolerant ones? It would also make sense to use more un-even age management to address public opposition to clear cuts and seed tree harvests. (4985.1)

PC # 509

Public Concern: The Forest Service should increase the amount of thinning, selective harvest and unevenaged management prescriptions for visuals, wildlife habitat, forest health and less controversy. (also see ss 4985.1 used in 508)

Sample Statement:

My first comment pertains to the desired future condition of the forest vegetation. It is stated in your proposed plan that the desired future condition of the forest vegetation is more towards shade intolerant species and less stand replacement fire regimes. I believe the best way to achieve these desired conditions is through active timber management. Selective timber harvest and thinning can bring areas of the forest that once experienced mixed severity fires back to that condition, instead of the stand replacement fires they are now experiencing. To achieve this though there must be more management areas of the forest that timber production is the primary use. Only 14% of the forest is in high intensity timber use in this plan. This is not enough to have the end desired conditions in the forest. I think management areas 3.3, 4.1, 5.1, 5.2 and 2.2 should have timber production as their highest priority use. By designating this greater portion of the forest to timber production, in the end you will get the most from the forest. Harvested correctly through selective harvest practices the tree specie composition, density and age classes can be brought into desired vegetation conditions that are not only beneficial to wildlife but are also visually pleasing and provide a forest that most recreationists desire to visit and can access. Also by concentrating on timber harvest more timber will be available to local sawmills that keep local residents employed and provide renewable forest products that are used by all Americans. (5256.1)

Sample Statement:

More logging.if you look at some of the timber sales you people do it is no wonder greens want to stop you. Look at some of the management on private timber ground and see what the going real estate market is getting for Plum Creek ground that is being sold these days. If you did some selective harvesting of unevened age trees you would have less controversy and be able to harvest every 20 years and have faster growing trees and healthier forest rather than high mortality rates and fires instead you spend all your money on a fire fighting budget than on putting up timber sales. (4941.2)

Sample Statement:

Forests are a renewable resource if managed properly. Naturally occurring things such as fires, insects, etc. can change the entire forest. It does not appear that you are putting your dollars and resources in that direction. Thinning and selective logging would make a lot more sense than letting it grow over and burn. (5050.1)

PC # 510

Public Concern: The Forest Service should identify acres of Fire Regime Condition Class in the Plan. Specific areas mentioned: Middle Clark Fork GA (LNF)

Sample Statement:

[Regarding] Fire/Fuels Management: The Plan seems relatively silent in regards to hazardous fuels reduction. We see little reference in the Plan to the amount of acreage in the Middle Clark Fork GA that currently is outside of historic fire regimes, but we assume it is high. (4795.8)

Sample Statement:

The 2002 "Development of Coarse-Scale Spatial Data for Wildland Fire and Fuel Management" reported that the BNF hosts 180,585 non-wilderness/roadless acres in Condition Class I, 44,999 acres in Condition Class II, and 168,734 acres in Condition Class III. One would assume these acres have grown and therefore it is important to currently identify those acres within the Plan. (4925.18)

Sample Statement:
The 2002 "Development of Coarse-Scale Spatial Data for Wildland Fire and Fuel Management" reported that the FNF hosts 36,520 non-wilderness/roadless acres in Condition Class I, 6,089 acres in Condition Class II, and 4,397 acres in Condition Class III. Comparative to other forests - as of 2002 - the FNF hosted relatively low acres outside of their historic fire regimes. However, one would assume these acres have grown and therefore it is important to currently identify those acres within the Plan. (4926.4)

PC # 511

Public Concern: The Forest Service should recognize the role of fire and allow more natural processes and less fire suppression. Specific areas mentioned are: North fork and Middle Fork Flathead River, Bob Marshall Wilderness Complex, Mission Mtn. Wilderness, Research Natural Areas (RNA's).

Sample Statement:
Fire should be allowed to play its natural role in the ecosystems of the National Forests where ever and when ever possible, consistent with the protection of firefighter and public safety, and the need to protect unique or special natural resources. Timber harvest and cattle grazing should be modified to reflect fire's presence, including taking "mandatory non-use" of grazing allotments for several years after major fires to allow vegetation restoration. Fuel treatments to protect properties in the Wildland-Urban Interface (WUI) should follow the "best management practice" for WUI as specified by Jack Cohen's research work at the Missoula Fire Lab. This includes removal of small diameter trees and ladder fuels as opposed to removing larger diameter, commercially valuable trees under the guise of "fuel reduction". (4958.4)

Sample Statement:
Fire should be used more often in forest management. (4200.3)

Sample Statement:
On P.19, the [Flathead Proposed] Plan states that, "Although about 72% of the forest is within the historical fire regime and over half is stand replacement fire regime, landscapes have become more homogeneous in species composition and structure. There has been a decline in fire adapted tree species associated with mixed severity fires, such as western white pine, western larch, ponderosa pine and whitebark pine. Ecosystems that once experienced mixed-severity fire regimes are now experiencing stand replacement fires."First, as USFS has admitted in recent years, the decline in most fire-adapted species is a result of the Service's fixation for the better part of a century on turning them into 2 X 4's as quickly as possible. And second, as the Service has belatedly acknowledged, their own policy of knee-jerk fire suppression (coupled with global warming)has led to overstocked forests in many areas, with a redictable rise in fire severity.Yet throughout the Plan, we see that the Flathead has apparently learned nothing from these past mistakes, and continues to advocate fire suppression in most areas of the forest, including Wilderness, where it should be the exception, rather than the rule. (4938.9)

Sample Statement:
The Proposed RFP fails to adequately recognize the important role that wildland fire plays within these fire dependent ecosystems of the northern Rocky Mountains. (5293.11)

PC # 512

Public Concern: The Forest Service should analyze and disclose the shortfall of old growth, should show the desired distribution on a map, not harvest in old growth, provide buffers of low intensity mgmt. and have standards to protect old growth and old growth dependent species.

Sample Statement:

There are no constraints in the model for old-growth forest dependent or sensitive wildlife. How will the Flathead take into account current conditions that are affecting the forest such as fragmentation, drought and global warming? This scale of even-aged logging requires analysis in an environmental impact statement to evaluate the effects on water quality, fish, and wildlife. (4924.30)

Sample Statement:

The Proposed RFP fails to disclose and analyze the significant adverse environmental impacts of the current shortfall in old-growth habitat, attributable to the failure of the Forest Service to provide scientifically sound old-growth protection and restoration policies in the original Forest Plan. It fails to remedy the old-growth habitat shortfall with clear and enforceable standards sufficient to insure old-growth associated species viability. It fails to address the truly significant information and issues relating to the viability of species that are dependent in whole or in part on adequate levels of old-growth habitat, well-distributed across the forest. (5293.6)

Sample Statement:

Old-Growth Forest HabitatThe PLMP at page 22, Table 3 shows a need to reduce the large tree component of the forest by 1 to 17%. However, this reduction in old-growth/potential old-growth forest habitat does not analyze the effects to old-growth dependent wildlife. It is arbitrary and capricious to decide that old-growth forest must be reduced without analyzing or disclosing how much old-growth there is, how it is distributed, how it is connected, what wildlife is affected, or what potential/replacement old-growth is needed in the event of a fire or other stochastic event. The Plan level is the appropriate place to analyze these Forest-wide effects. In fact, the Analysis of the Management Situation (AMS) that was prepared by the Forest Service for this plan revision found that: "There is a decrease in large areas of old, large diameter stands over the past century in roaded areas as a result of past timber harvest." (AMS page 4-12) This is in direct contradiction that there is a need to reduce the large tree component in the Forest. (4924.10)

Sample Statement:

Place longer-rotation or less intensive uses adjacent to designated old growth, so that a lower-intensity managed zone serves as a buffer for the old-growth system (Noss ad Cooperrider 1994). Avoid placing high intensity land uses (e.g. clearcuts, roads) next to designated old growth. (Pfister 2000) (4924.18)

PC # 513

Public Concern: The Forest Service should actively manage old growth and cut trees to recruit old growth and have most old growth in Wilderness and Backcountry.

Sample Statement:

We believe that old growth patches located within management areas that allow for harvest and that are identified as existing in Condition Class I, II, or III must be available for management and restoration! Harvest will provide that the carbon produced will be manufactured into durable goods that may be protected from decomposition for many decades before need for final sequestration. (4925.20)

Sample Statement:
This desired condition [BNF Ch. 1, Pg. 22, Item i] should include a goal of utilizing forest management prescriptions to maintain and improve old-growth characteristics. (5792.14)

Sample Statement:
Management must be directed toward desired future conditions that describe the managed forest of healthy, vigorous, timber stands of mostly early seral native tree species and a full compliment of age classes and/or the result of each managed area direction. As a example, the Plan proposes the Old growth prevail on 15-20% of the forest. If "old growth", climax stands are allowed to dominated the forest- as appears to be the case if all old growth and recruitment old growth areas outside of existing Wilderness and especially if the Wilderness areas are included, Old Growth will become a very large component. These likely conditions must be described when discussing future condition. This plan ignores the scenario that with all the Wilderness, Wilderness Study areas, Backcountry and other reduced harvest areas (all MA3s and 4.1, "old growth" and climax stand will surely be grossly over-represented. (5787.3)

PC # 514
Public Concern: The Forest Service should be harvesting old growth and allowing young trees to replace dead and diseased trees.

Sample Statement:
We should be harvesting old growth and allowing the young trees to replace the mature dead and diseased trees. (5083.5)

PC # 515
Public Concern: The Forest Service should suppress fires, not allow WFU and decrease man-made fires for air quality.

Sample Statement:
I am 61 years old and have developed an asthmatic condition to forest fire smoke, I am on 2 inhalers, you have know idea how I and many others are suffering from your let it Burn policy, it is killing us and destroying valuable resources. (5083.7)

Sample Statement:
Decrease man made fires. (4298.4)

Sample Statement:
I am disgusted to see it mentioned that fire will be a management tool and yet millions are spent on saving structures. If it is to be a tool then realize that historically when a large fire came i.e. 1913, 1927? That people got out of the way and then returned to whatever may be Left. Or they aggressively fought fire before it could reach that point. F.N.F. has lost its management focus in that area, so go back and revise the plan to a more pro-active fire response. (4951.6)

Sample Statement:
Return to the 10 a.m. fire suppression policy and the use of fireline. (4386.23)

PC # 516

Public Concern: The Forest Service should display the effect snags and downed wood have on increased fire hazard.

Sample Statement:

I would like the plan to consider to a greater degree the fire danger of remaining snags and woody material that can threaten the area. (4192.2)

PC # 517

Public Concern: The Forest Service should display how many acres of prescribed burning and WFU are projected for the next 10 to 30 years

Sample Statement:

[Regarding} Fire/Fuels Management: We suggest you set a goal of treating, say, 10,000 acres or more annually (not including timber harvest treatments) of those areas the furthest outside the natural range of variation. (4795.9)

Sample Statement:

Ch. 2, Pg. 78, Item c This objective would be more clearly expressed in terms of the number of acres that would be treated through wildland fire use as the appropriate management response. An objective based on a percent of natural ignitions fails to account for the potential for unnaturally large fire events. (5792.34)

Sample Statement:

We believe is it important for the public to know how many acres of prescribed burning are being proposed within the first 3 planning decades. How many of these areas are proposed inside the Wildland Urban Interface and how many acres lay outside the WUI? (4925.12)

Sample Statement:

Ch. 2, Pg. 78, Item e Clarify whether this objective is in addition to those acres proposed for treatment in Ch. 2, Pg. 78, items a through d. (5792.35)

PC # 518

Public Concern: The Forest Service should:

- **identify more clearly the management activities that affect SOC and SOI,**
- **include locally rare species (not just G1-G3) on the SOC list**
- **include species that are not known but have high potential to occur**
- **require surveys and BE's for SOC prior to ground disturbance activities**
- **include on the SOI list species cultural, economic and ecological species other than S1 and S2**
- **continue and be proud of the strong botany program on the WMPZ**

Sample Statement:

Field surveys and biological evaluations should be performed for all species on the SOC list prior to ground disturbing management activities. The Species of interest (SOI) list should include other S1,S2, and S2 and S3 NatureService ranked species of significance (i.e.. cultural, economic, ecological). Species on the SOI list will be noted during survey activities but will not require biological evaluations, although some extra consideration may be paid to species on the SOI list depending on the specific circumstances of the management activity.The Western Montana Forest Planning Zone is building a strong botany program that they should be proud of. MNPS would like to see these efforts continued under the new a native plant perspective. Thank you for the opportunity to provide input and we hope you find it helpful. (4975.3)

Sample Statement:
We concerned about how national forest plans will protect sensitive plants. The Plan allows for two categories: (1) species of concern and (2) species of interest. However, the Plan is too vague on management actions that will be empowered by these classifications. Will only plants on the "species of concern" list be surveyed for whenever a ground disturbing activity occurs? For which species will Biological Evaluations be prepared? (4975.1)

Sample Statement:
We believe each forest should have two sensitive plant lists as proposed by the Plan. The Species of Concern (SOC) list should be determined at the regional level by a group of botanists, including the regional botanist, forest botanists and other knowledgeable professionals, using data provided by Nature Serve and other sources. Species included on the SOC list may be globally rare or locally rare. This is preferable to a SOC list simply composed of G1, G2 and G3 species as determined by Nature Serve for two reasons, Nature Service for two reasons. Natureserve ranks are often determined by one person who necessarily has less knowledge of vegetation resources of Region one than the collected forest botanists. Furthermore, disjuct populations, populations of locally declining species, and some declining cultural or economic species may high conservation value not reflected in the G-rank. Additionally, rare species that are not found on the forest, but have high potential to occur there, should also be included on this list. The SOC list should be revised often to reflect the changing knowledge base. (4975.2)

PC # 521
Public Concern: The BNF should use MA 5.2 to represent WUI and not allow WFU.

Sample Statement:
This forest plan [BNF Ch 2, Pg. 83] should include designation of Management Area 5.2, which is the residential and forest intermix area. This area should represent the wildland urban interface and specifically preclude wildland fire use or include clearly established criteria for wildland fire use in the fire management plans. (5792.43)

PC # 522
Public Concern: The BNF should focus fuels treatment on the Community Protection Zone over the WUI because it'd be much quicker and provide most immediate defense zone.

Sample Statement:
On Page 66: Strategy [BNF Proposed Plan], "The amount of time, money and uncertainty involved in achieving the desired conditions requires a strategy for deciding where and how to implement vegetation treatments. Accordingly our emphasis will be on: a. Landscapes within the wildland urban interface zone (WUI) that have high fuel loadings and fire hazard." For the same reasons you list we would give priority to the community protection zone (CPZ) work is much quicker than to treat the much larger WUI, up to a mile and a half or more from structures according to BNF practice. Focus on CPZ work is the most efficient approach because it focuses on the most immediate fire defense zone. Get er done and move on to the next neighborhood. Before you know it you could be effectively treating a large portion of the community protection zone up and down the valley. Your "vegetation treatments" cause fire behavior hazard to increase up to eight years according to recent BNF EISs. Strategically, it seems important to do the CPZ work first before the WUI logging to protect the community from the extensive fire hazard increase from the WUI logging all over the mountains above communities. (4990.29)

PC # 523

Public Concern: The BNF should reclassify MA 1.2 to 4.1, 3.3 or 2.2b in the Stony Mtn, Burnt Fork, Sleeping Child and Sapphire areas to reduce fuels and practice forest restoration projects. (also see ss 4079.2 in pc 505)

Sample Statement:

The Burnt Fork watershed is heavily loaded with fuels and fire-susceptible species of trees. An intense wildfire would seriously degrade water quality in this important tributary of the Bitterroot River. Designation of this area as MA 1.2 would almost certainly condemn this area to intense wildfire with consequent environmental damage. We strenuously recommend that this area be reclassified as MA 3.3 or MA 2.2b. (4986.15)

Sample Statement:

The Sleeping Child watershed has been seriously degraded by intense wildfire. The area is loaded with fuels and is at risk of a reburn. Dead uprooted trees are contributing sediment directly into Sleeping Child Creek and riparian areas have been seriously damaged. If there is any place on the forest desperately in need of riparian restoration and fuel treatments this is it. We feel very strongly that this area be reclassified as MA .1, Ma 3.3, or MA 2.2b. (4986.18)

PC # 524

Public Concern: The BNF should eliminate the 2.2a (use MA 2.2b) MA, because it precludes restoration projects and there's enough areas for quiet recreation.

Sample Statement:

The sub-category 2.2a should be eliminated from the Plan altogether. This sub-category precludes the applicatin of badly needed restoration and remediation projects. Given the ready availability of vast landscapes of Designated Wilderness, there is no need for additional opportunities for backpackers, hikers and horsemen. (4079.3)

Sample Statement:

The recommended category of "non-motorized" back country 2.2a should be deleted from the recommended plan. (5062.2)

Sample Statement:

The description of "Backcountry" in the Draft Plan is unacceptable to RCORUA, and we propose the following changes:Backcountry areas may be suitable on a limited basis for the construction of new motorized trails as needs and demands by forest users may arise.Management Area 2.2q "non-motorized Backcountry" should be eliminated from the plan altogether for the sake of simplicity. There are very few acres designated in the Draft Plan as MA 2.2a, and these areas should be assigned either to MA 1.2 or MA 2.2b to simplify the Plan. At the very least we insist that historically utilized motorized trails in MA 2.2a should remain open. (4986.28)

PC # 525

Public Concern: The BNF should develop forest-wide guidelines for old growth, snags, and downed wood, not at the harvest unit level.

Sample Statement:

We would also like to encourage the forest to formulate forest-wide guidelines for old growth, snags and down woody debris and not just unit specific desired conditions. Specifically, if old growth, snags and down woody debris are representative across a watershed, than each individual unit of harvest should not have to be representative since guidelines and desired conditions are being met outside the cutting units. (4925.21)

PC # 526

Public Concern: The BNF should provide more detail on how Table 2 DCs were derived and why they differ from the LNF & FNF.

Sample Statement:

More detail should be provided throughout the plan to explain how targets items a and b were established [BNF Ch. 2, Pg. 78]. These acreage targets for treatment are less then those selected in the Lolo and Flathead NF proposed plans and should be reconsidered. (5792.33)

PC # 527

Public Concern: The BNF should manage for 5 to 10 tons/ac on PP and DF sites and 10-15 tons/ac on other sites.

Sample Statement:

The guidelines for downed woody material (BNF Ch. 3, Pg. 113, Table 10) represent the low end of the generally accepted ranges for these conditions. We suggest 5-10 tons per acre on PP and DF sites and 10-15 tons per acre on the other vegetation types. (5792.51)

PC # 528

Public Concern: The Lolo should have clear criteria, guidelines and locations for using WFU in MA 5.2, the Rattlesnake and Welcome Crk. Wildernesses, and the Stateline area because it is too risky for values at risk, will increase firefighting costs and affect State fire protection and State lands.

Sample Statement:

We are concerned with the application of wildland fire use in the Rattlesnake, Welcome Creek Wilderness, and some wilderness study areas that are potentially too small to adequately accommodate wildland fire use and are in close proximity to State fire protection areas and State lands. (5792.83)

Sample Statement:

We are concerned that Management Area 5.2 allows the option of wildland fire use [LNF Ch. 2, Pg. 125]. By definition, these wildland urban interface areas are residential and forest intermix. Fire suppression and prescribed fire use are suitable tools, but wildland fire use in these areas is too risky for the values at risk and threatens to drastically increase fire suppression costs and liabilities. Where it is considered in the WUI, there should be clearly established criteria that are established in the fire management plans. (5792.85)

Sample Statement:

With regards to the Lolo LMP, we are discouraged by the lack of direction in the proposed LMP for implementing wildland fire use WFU for resource benefit. Almost every management area in the plan is deemed "suitable" for WFU, however, there are no standards or guidelines for creating a WFU program. Furthermore, there is no direction regarding in which locations WFU is preferred. WFU should be implemented in the roadless lands along the Idaho/Montana border. The WFU program on the Clearwater has suffered as a result of the lack of an approved WFU implementation plan on the Lolo National Forest. Now, the Idaho Panhandle National Forest has approved WFU in the upper St. Joe River drainage, which necessitates the immediate consideration of WFU across the Montana border. Without a WFU implementation plan on the Lolo, wildfires that start on the Clearwater or Idaho Panhandle National Forests cannot be allowed to burn across the border into the Lolo National Forest. (4218.2)

PC # 529

Public Concern: The LNF should clearly define the relationship between WUI and 5.2

Sample Statement:

From a fire hazard standpoint, Potomac Corporation supports this MA which borders the Ranch on approximately 2.7 miles of property line. However, the Draft Forest Plan does not explicitly equate MA 5.2 with wildland urban interface areas (WUIs) though Desired Conditions are specified for vegetation management within WUIs. The desired vegetation conditions emphasize vegetation treatments close to pre-settlement conditions, generally meaning less dense and slightly different species compositions. The Draft Plan states that priority treatment areas would be those WUIs identified in community wildfire plans. The Final Plan needs to clearly define the relationship between WUI and MA 5.2. (5304.4)

PC # 530

Public Concern: The LNF should eradicate knapweed rather than contain it.

Sample Statement:

(Vegetation) the phrase "we plan" shows up many times in the "Desired Condition" segment.I'd rather you PLAN to eradicate knapweed, rather than containing it, as the last sentence (above) seems to imply. (4550.8)

PC # 531

Public Concern: The LNF should increase the number of acres treated for weeds and achieve the higher end of the range of reduction for weeds objectives and eradicate new infestations in Mineral County.

Sample Statement:

Reduction of invasive plants along theforest road sides need to be close to the 70% target to keep the plants(especially knapweed) from spreading into the adjacent environment. (4928.2)

Sample Statement:

[Regarding] Invasive Plants: The range in your objective of achieving a 10 to 70 percent reduction on 40,000 acres within ten years should be adjusted upward. If only the low end were to be achieved, as is all too often the case, monitoring would record it as a "success", whereas in reality a 10 percent reduction is ineffective "Eradicate to the extent possible noxious weeds within Mineral County, and eliminate any new infestation that may become established and/or exist in the county). (4795.17)

PC # 532

Public Concern: The LNF should identify the impacts and modify plan components for resources and expansion of WUI based on the divestiture of PCTC lands

Sample Statement:

The Community Council is currently working on a land use plan for the Clearwater Valley. One of the primary concerns is the expected increasing divestiture of Plum Creek Timber Company Lands. This has substantial potential implications for changes in land uses within the Valley. This will present several challenges including increasing threats to the environmental quality and biodiversity of the Valley, as well as expansion of the Wildland-Urban Interface (WUI). Such changes in land ownership have tremendous potential for impacting National Forest lands in the Valley. As outlined in the recently released USFS report on this topic, this is one of the 4 greatest threats identified by Chief Bosworth. The Lolo NF plan is currently inadequate in addressing this issue. What will changes in ownership and land uses mean to forestry and biodiversity objectives? How will the NF address an expanding WUI and potential new fuel mitigation expectations that may arise, but that may threaten or interfere with biodiversity, ecosystem restoration, forestry, aquatic, and recreational interests? How will road use and densities be affected by such changes? How will expanded development influence the spread of weeds, increases in problems with dogs and feral cats, and other related human activities. The plan must do a better job of anticipating such potential changes, and identify how the NF might respond. For example, the recent sale of Section 5 by Plum Creek in the northern part of the Clearwater Valley pushed the local Ranger District to begin immediate investigation of possible land exchanges to address concerns about sales of other checkerboard ownership in the area. This was clearly too late of a response. Much more thought and potential strategies and guidelines are needed as to how the NF will deal with potential changes in adjacent land uses. (4929.1)

PC # 533

Public Concern: The LNF should increase the amount of shrubs.

Sample Statement:

In general we feel that the shrub component is being lost on Montana's forested lands. It is the primary component of the winter diet for these species, particularly in the Lolo NF. We ask that the new forest plans incorporate the flexibility to address special needs of wildlife when designing forest management actions. (5244.12)

PC # 534

Public Concern: The LNF should increase the large size class to 36%

Sample Statement:

Forest-Wide Desired Conditions [LNF Pg. 19] We are disappointed to see a goal of "Maintain" for old growth, which is currently 22% of the existing forest condition. We are in favor of increasing the proportion up to 36% at the upper end of the Desired Condition Forest-Wide range. (5069.4)

PC # 535

Public Concern: The Flathead should not allow sheep on the forest for weed control because of conflicts with bears

Sample Statement:

In this section [FNF, Page 74] there is a reference to the use of "integrated pest management" We do not feel that wee eating sheep are an appropriate tool, given the likelihood of conflict with native predators. We request that you make clear that sheep will not be a tool used to control weeds. (5290.17)

PC # 536

Public Concern: The FNF should re-establish low elevation forest types in advanced age and size class including old growth.

Sample Statement:

Forest Products: the draft is wholly remiss to not include a map that compares or shows timber suitability against IRA'S. The Plan Set of Documents from which the TSPQ are derived discusses sustained yield and size classes, but not distribution of age classes within the historic RV. This is a major bias and shortcoming of the draft plan. 'In order to reach the goal of historic RV, the FNE must look at re-establishing low elevation forest types, including old growth in advanced age and size classes. (4980.44)

PC # 537

Public Concern: The FNF should manage the Coram Experimental Forest for fuels reduction and WUI.

Sample Statement:

The 8000 acre Coram Experimental Forest needs better management.This area has continued to grow in land size since its inception. Its dense forests in the urban interface will be the inducement for future fires expanding at a rapid rate through the Canyon area. (5044.4)

PC # 538

Public Concern: The FNF should address decisions needed that were identified in the AMS in the Final Plan for distribution of structural stages and old growth, snags and downed woody material.

Sample Statement:

The following are some of the decisions the AMS deemed important that still need to be addressed in the revised Forest Plan.Vegetation And DisturbanceDecisions Needed: o Where is it appropriate to restore or maintain vegetation structure, composition, pattern and function of landscapes and communities toward sustainability objectives? Where is it appropriate to alter historic vegetation components to accommodate other goals and objectives? o To what extent and where will we accommodate disturbances; to what extent and where will we try to prevent them? What is an acceptable and achievable level of fire use to help move toward ecological sustainability within the next planning period? What are the appropriate management tools available to manage after disturbance occurs and where will they be allowed? o What is the desired distribution of various structural stages, from openings to mature and old growth? What management direction is needed to move toward that distribution during the next planning period? o How much old growth is sustainable across the landscape and what management direction is needed to achieve the desired condition? o What management direction is needed to provide for habitat connectivity, linkage zones between landscapes, wildlife corridors, habitat edge, and horizontal and vertical diversity? o What management direction is needed to integrate snags and down woody material at the desired stand and landscape level that maintains ecosystem structure and function?Assessment: Vegetation Components at AMS pgs. 4-18 (4924.32)

PC # 539

Public Concern: The FNF should disclose how size class vegetation DCs are consistent with fire ecology and science.

Sample Statement:

The DRP [Draft Revised Plan] indicates the acreage of seedling, sampling and small trees will be increased nearly 40%, while the acreage of medium and large trees will be decreased by a similar amount. This appears to run contrary to recent trends, allegedly based in fire ecology, to retain the more fire-resistant larger trees while reducing the amount of smaller trees, fine fuels, and ladder fuels. Ditto for recent trends in fuels reduction work in the urban/wildland interface. It appears to instead return to the old business of logging old growth and mature forests. Q-9: How, specifically, are these projections of managed changes in vegetation to be consistent with the principles of fire ecology, fuels reduction work near structures, and the retention of old growth and old growth associated wildlife? Without, a specific answer to our Question #9, above, and citations to relevant scientific literature, we are unable to determine what exactly the DRP is proposing and whether it is based in science. (4542.33)

PC # 540

Public Concern: The FNF should not adopt A21 because it doesn't reflect historic OG conditions and this is a significant decision needing appropriate NEPA.

Sample Statement:

In the past, there has been conflict over the handling of "Old Growth". It appears that the conditions and regulations of Amendment #21 to the current Forest Plan have been adopted in the new plan. This is not appropriate for two reasons. First, A21 does not reflect what historic old growth occurred on the Flathead. Second, there was not a NEPA document prepared that displayed the significance of this decision. The Ayers Report showed old growth as 6% of the forest in 1898-99. In 1991 the forest showed 20% old growth. The current policy of managing, on a stand by stand basis, is not good for the old growth dependent species or the health of the forest. Guidelines must be established that: 1) reflect the true historic old growth acres, less than 10% and 2) distribute old growth across the landscape and not in individual stands. (4757.17)

PC # 541

Public Concern: The FNF should narrow the ranges for veg DC's in Table 3 on page 22.

Sample Statement:

1. Table 3 on page 22 does not have the right emphasis for achieving the size distribution goal because it lists very wide ranges, and the goals should be defined more narrowly. The range should not vary by a factor of two. (4770.1)

PC # 542

Public Concern: The FNF should divvy the Veg DC's between:
-- areas for timber production and those areas not for timber production.
-- Wilderness and non-wilderness because management options available are so different.

Sample Statement:

Vegetation and Fire. The burning proposals should be separated into wilderness and non wilderness components. (4966.15)

Sample Statement:

Both these statements [FNF P.20 top two bullets], reflect a bias throughout the Plan that does not recognize that timber management is the tool that should be used to avoid and correct the problems listed in this section and that the National Forest vegetation has not been managed in a way to produce sustained yields of timber and clean water. Timber management should be the primary tool to restore historic range of variability outside wilderness. Recommend these statement be revised to read: "Due to fires, insects, disease, and lack of timber management, snags have increased across the landscape." "Due to fire suppression, and lack of timber management, increases in surface, ladder, and aerial fuel loading have occurred across all vegetative types." It is disingenuous for the Plan not to recognize the role of the precipitous decrease in forest management over the last 20 years as a significant factor in the forest health decline and increase in snags and high hazard fuels over the landscape.P. 20, last DC bullet, Most invasive species are not adapted to shaded environments and when the site is exposed by fire or other disturbance, invasive weeds expand rapidly. Recommend adding, "In contrast, other invasive species such as spotted knapweed are currently widespread but have low risk to establish, spread, and alter over 680,000 acres of forested communities, until those areas are disturbed, then they become high risk." .Continue on to 16 (4933.15)

Sample Statement:

There is very little opportunity for wildland fire use outside wilderness [FNF P. 85-86, Vegetation and Fire item a.] that would not pose significant risk to valuable resources, public health, safety, and property. MFMU does not consider catastrophic wildfires to be "vegetative treatments". MFMU recommends that objectives for planned vegetative treatments, natural ignition and prescribed burn acres should be separated into wilderness and non-wilderness objectives so the public knows how many acres of wildland fire use, prescribed burning, or other vegetative treatment is planned outside wilderness. (4933.29)

Sample Statement:

3. The desired size distribution condition in Table 2, which supposedly has a historic basis, is very questionable considering that the present distribution has been highly skewed toward smaller classes through timber management and stand-replacement fires. The harvested areas and burned-over areas are exclusively of the smaller size classes, and the suppression of small fires has allowed small trees to flourish everywhere, increasing the probability of big fires. (4770.3)

PC # 544

Public Concern: The FNF should provide a strategy and objectives for firebreaks in major drainages, along RCAs, and along private property boundaries for forest diversity and economic benefits.

Sample Statement:

Nothing is said of objectives for the number of acres needing treatment that would provide a strategic network of firebreaks throughout the non-wilderness portions of the Forest. Sale of harvested fuel break timber would provide for increased budget and salvage sale funds. (5788.3)

Sample Statement:

MFMU [Montanas for Multiple Use recommends revised language [FNF DC (h.): "Vegetation and fuels will be managed to protect riparian areas so that adverse effects of disturbance processes, such as fires and floods, will be minimized and allow these processes to continue to play an important role in maintaining and restoring vegetative conditions in (RCAs)". Certainly thinning and heavy ground fuel reduction adjacent to and within RCAs where necessary would reduce damage by fires to RCAs, streams, and fish. The adverse effects of floods would be minimized if non-wilderness watersheds were managed to achieve and maintain desired conditions of a diverse healthy forest cover that included strategic firebreaks to help save watersheds from destruction by fire and maintain watershed function in the event of fire starts.P. 19, second bullet, It is misleading to characterize 72% of the forest as being "within the historic fire regime as if there is no problem on the majority of the forest. You folks know better than any that the "stand renewal fire regime areas" are not within historic range of variability relative to diversity of age classes and species and in the extent and continuity of current high hazard fuels. The only way the fire regime can be altered in cool wet habitats is through management to control crown density and ground fuels. The lack of active vegetation management is a cause of the continuous high hazard fuels in all non-wilderness sites in partnership with fire suppression. MFMU recommends that information regarding the effects of these trends on the fire environment (data on acres or percent in high, moderate or low hazard fuel) and the threats these conditions poses to resources and people in the future should be part of the "background" on Vegetative conditions.Continue on to 15 (4933.14)

Sample Statement:
MFMU [Montanas for Multiple Use] made a sincere effort to initiate collaborative fuel reduction planning with the Flathead NF and numerous stakeholders on July 26, 2001. The Flathead National Forest did not respond, and shortly after that meeting the Moose Fire broke out and demonstrated the urgent need to get strategic fuel reduction projects in place. Surely the current Sun Dog Fire and all the catastrophic fire events that have devastated watersheds, public treasuries, and State and private property since July 26, 2001, demonstrates the necessity to plan and implement strategic fire breaks in major drainages as well as along property boundaries before the fires start. Not only would this create needed forest diversity and make significant progress toward the desired conditions for vegetation stated on pgs. 21 and 22 of the Proposed Plan, but the value of the excess biomass would not only pay for the fuel reduction, it would generate revenues (Fiedler, et. al., 2001. A Strategic Assessment of Fire Hazard in Montana, University of Montana). The Proposed Plan should establish objectives for the number of acres needing treatment that would provide a strategic network of firebreaks throughout the non-wilderness portions of the Forest. These firebreaks would significantly increase the probability of containing future fires to be less damaging events. The increased timber revenues generated by the strategic Plan would provide for increased future budget and salvage sale funds. The inadequate Plan as proposed is simply a prescription for accelerated forest health decline and for catastrophic fire to be the primary agent of change that is unacceptable to the public and will further damage the economy and natural resources. (4933.2)

PC # 545
Public Concern: The FNF should change the vegetation background information & Desired Conditions to include:
- **Acres of high, moderate and low fuel hazard**
- **Add "lack of timber mgmt." to first two bullets on page 20**
- **Add "until those areas are disturbed, then they become high risk" to last bullet of background on page 20**
- **Add "timber harvest" to DC 'h.'**

Sample Statement:
"Due to fire suppression, and lack of timber management, increases in surface, ladder, and aerial fuel loading have occurred across all vegetative types." Approved 10-0. (4979.3)

Sample Statement:
Comment #4: Pertaining to Chapter 1, Vision, Page 20 should be restated to read: "Due to a reduction in timber harvesting, increases in surface, ladder and aerial fuel loading have occurred across all vegetation types. This has made fire suppression a necessary component of our management philosophy. The severity of the fires on our Flathead National Forest Service could be managed through a viable timber harvest program. Fuel reduction would occur in conjunction with timber sales." Please respond if this is true or false. (5048.4)

Sample Statement:

Wilderness is supposed to provide a benchmark for naturally operating ecosystems and lumping wilderness with non-wilderness [FNF Proposed Plan P. 21 and 22] does not contribute to monitoring intended by the Wilderness Act. Non-wilderness conditions need to be analyzed separate from wilderness conditions in order to establish management priorities and alternatives. MFMU recommends that Desired Conditions Tables for species composition and size class should be displayed separately for wilderness and non-wilderness areas of the forest because the management options available are so different. P. 22, DC (g), Again there is no recognition that timber harvest will have any significant role in disturbance processes that would contribute to functioning ecosystems in the Flathead National Forest. Science shows that current extent of fires, insects, and disease are way outside the historic range of variability. Another sentence should be added to (g): "Timber harvest will play a significant role in the landscape and contribute to healthy functioning ecosystems in non-wilderness areas of the forest suitable for timber harvest."P.22, DC (h), This desired condition again illustrates a strong anti-timber management bias throughout this proposal. The entire vegetation section does not have a single desired condition statement indicating a need for timber management to play a role in the ecosystem. Recommend rewording: "Fire and timber harvest would play an increasing role where appropriate and desirable. Fire would be suppressed where necessary to protect life, resources, and property." (4933.16)

Sample Statement:

[On FNF Proposed Plan] P.20 top two bullets, revise to read: "Due to fires, insects, disease, and lack of timber management, snags have increased across the landscape." Approved 10-0. (4979.2)

Sample Statement:

[On FNF Proposed Plan] P. 20, last DC bullet, "In contrast, other invasive species such as spotted knapweed are currently widespread but have low risk to establish, spread, and alter over 680,000 acres of forested communities, until those areas are disturbed, then they become high risk." Approved 10-0 (4979.4)

Sample Statement:

On FNF Proposed Plan P.22, DC (h), "Fire and timber harvest would play an increasing role where appropriate and desirable. Fire would be suppressed where necessary to protect life, resources, and property." Approved 10-0 (4979.5)

Sample Statement:

There is no recognition [FNF P. 22, DC (g)] that timber harvest will have any significant role in disturbance processes that would contribute to functioning ecosystems in the Flathead National Forest. Science shows that current extent of fires, insects, and disease are way outside the historic range of variability. Another sentence should be added to (g): "Timber harvest will play a significant role in the landscape and contribute to healthy functioning ecosystems in non-wilderness areas of the forest suitable for both the regulated and non-regulated timber harvest." (5788.20)

PC # 546

Public Concern: The FNF should increase the amount for riparian hardwoods, cedar/hemlock, and shrubs in DC table.

Sample Statement:

it seems unlikely, as suggested in Table 2, that there is 0% of riparian hardwood, less than 1% of the cedar/hemlock type on the forest, and less than 1% of the huckleberry type - with all of these being desired conditions for the Flathead. (4938.47)

PC # 547

Public Concern: The FNF should add "Large-diameter fire-scarred WL and PP snags would increase on the landscape". (see also ss 4996.9 under pc 548)

Sample Statement:

Of all the coniferous (all deciduous trees are also important) trees on the Flathead, research shows that larch is the most important to wildlife. Likewise, ponderosa pine is extremely important, but is more abundant on the Lolo and Bitterroot Forests than here on the Flathead because of forest types. Yet, densities of these trees species have been reduced compared to historic conditions because they are highly valued as a timber commodity and a fuelwood. (4996.7)

Sample Statement:

It is stated that snag densities on the Flathead National have increased over the years. I too have seen an increase in certain types of snags, but many of these snags will never be used by wildlife, other than for woodpecker foraging, because they lack the right decay properties. Snags killed by insects often fall over before they have been softened enough by decay to be utilized by wildlife species. The snags and trees that are most suitable for nesting, roosting and denning are those that have developed heartrot while still living. (4996.6)

PC # 548

Public Concern: The FNF should add a size class greater than 21" to the DC table to distinguish old growth from large diameter

Sample Statement:

Historically, there were more old-growth structures in our low elevation forests than there are today. If the goal is to maintain old-growth at historic conditions then I think a larger size class (> 20 inches?) needs to be added to Table 3 and have the need for change to be a positive one. I also think that the Lolo is headed in the right direction with its desired condition that states "Large diameter, fire-scarred larch and ponderosa pine snags would increase on the landscape." I think the Flathead needs to include this desired condition and to consult with experts on adequate target densities for these structures. (4996.9)

Sample Statement:

Table 3 (Page 22) in the proposed plan lists trees greater than 15 inches as a size class that the forest would like to reduce. I agree that there are a lot of mature trees that can be harvested around the 15 inch diameter size class. My concern here though, is that this gives the Forest license to harvest more old-growth trees. I have spent a lot of time across the Flathead National Forest doing research on the effects of roads on these structures and it is very clear to me that there are a lot more large larch stumps than there are large larch trees and snags. My data from the Flathead National Forest show that within 50 m of any road, large snag densities are significantly reduced. It was only in stands far from roads, far from towns, and that had no history of timber harvesting, where we found an abundance of suitable snags and logs so important to wildlife. (4996.8)

PC # 549

Public Concern: The FNF should establish a percentage of the forest for old growth.

Sample Statement:

This desired condition for old-growth [Ch. 1, Pg. 22, Item e] should establish a target percentage for the forest and include a goal of utilizing forest management prescriptions to maintain and improve old-growth characteristics. (5792.99)

PC # 550

Public Concern: The FNF should specify standards for OG, snags and downed wood including post-fire salvage.

Sample Statement:

While the PLMP states that planning and implementation of projects would be guided by one of the reference guides, those guides are discretionary. Furthermore, the Old Forest Conditions, Snags and Down Woody Debris Resource Guide contain no actual standards for snags or down woody debris. Instead there is a vague statement: "The Forest will continue applying recommended levels of retention for large live trees, snags and coarse woody debris throughout the forest, including timber harvest areas." What are recommended levels of retention?By not having snag or down woody debris requirements the Forest Plan is ignoring that at least one-fourth of all bird species in western forests and as many as 45% of native American bird populations are snag dependent. Over half of the 102 terrestrial vertebrate species in Washington state den or nest only in the boles of dead or dying trees. And two-thirds of all wildlife species use deadwood structures or woody debris for some portion of their life cycles. (cites in Hutto). Furthermore, there are no snag or down woody debris standards, guidelines or objectives in the PLMP for post-fire salvage logging. Attached as Exhibit 1: Toward Meaningful Snag-Management Guidelines for Postfire Salvage Logging in North American Conifer Forests by Richard L. Hutto. (4924.11)

PC # 551

Public Concern: The FNF should not reduce the large diameter size class by 17% or increase the seedling/sapling component by 40% for wildlife and old growth considerations. (see also ss 4770.3 under pc 542)

Sample Statement:

We are very concerned by your suggestion [FNF Page 22] that you plan to decrease the amount of old growth trees by up to 17%. Large diameter trees have already been greatly reduced in the Flathead National Forest and every effort should be made to not lose any more of these trees. There are a number of sensitive species such as lynx, fisher and a whole host of bird species that are highly dependent on old growth as wel as snags and downed woody debris associated with this type of forest. (5290.4)

Sample Statement:

to reduce the large tree component of the forest from 1% to 17% without consideration for wildlife habitat. This is an arbitrary decision based on logging interests rather than the public interest and is detrimental to tourism and outdoor recreation. (4557.2)