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Submitted via CARA: cara.ecosystem-management.org/Public//CommentInput?Project=56912

October 8, 2020

Subject: Selway Saginaw Vegetation Management Project #56912

Dear Ms. Tripp,

Thank you for the opportunity to comment on the proposed Selway Saginaw Vegetation Management Project. Since 1958, Montana Wilderness Association (MWA) has worked with communities to protect Montana's wilderness heritage, quiet beauty, and outdoor traditions, now and for future generations. As Montana's oldest state-based grassroots wilderness organization, we represent over 5,000 members, many of whom have a deep personal interest in the Big Hole and the wildlife it supports. MWA has a long history of working in this landscape and we offer the following comments for consideration in developing the EA.

Silvicultural Prescriptions

We support retention in all harvest units and we encourage the combined use of both aggregate and dispersed retention within a given unit to promote sustainable forest management. Dispersed retention enhances the ability of retention patches to support a composition of species found in unharvested forest. The ecological benefits of combining dispersed and aggregated retention within a single cutover area are still apparent 15 yr postharvest (Franklin et al 2018). Studies also demonstrate the importance of incorporating a variety of patch sizes in retention harvest designs to support various vascular plant species (Franklin et al 2018). These practices not only provide conservation benefits for vegetation and wildlife but also offer benefits for scenery.

Aggregate retention should be centered on mature or old growth trees, with concentrations of coarse woody debris, snags, seeps, rock outcroppings, or other unique structural and/or habitat features. In particular, aggregates should be located where stands with old growth attributes exist as described by Green et al. (2011), but which may otherwise be of insufficient size to be allocated according to Land Management Plan old growth requirements. To the extent



practical, aggregates should include an overall representation of the tree species that were present in the original stand.

In the treated areas between the aggregates, the proposed retention should still occur as individual leave trees, coarse woody debris, snags, and small clusters of trees. All large trees residing in the interstitial spaces should be retained. Retention of individual trees is intended to provide candidates for snag and coarse woody debris recruitment and nesting habitat. Following harvest, treated areas should be broadcast burned, and aggregates should remain unburned.

Finally, the edges of these units should be treated in a manner that mimics a natural opening. Unit edges should be variably thinned, creating a gradual transition from an open canopy to a closed or nearly closed canopy in the adjacent stand. This recommendation is intended to reduce the “edge effect”, resulting in a more visually appealing opening and lessening the impact on wildlife. Studies indicate that the effectiveness of maintaining habitat for forest dependent species increases when higher levels of dispersed retention surround the patches and therefore reduce the structural contrast between patches and adjacent harvested areas (Franklin et al 2018).

Age Thresholds

Late-successional forests provide disproportionately high ecological value as wildlife habitat, carbon storage, and resilience to natural disturbance. Late-successional conditions include large and old trees, snags, and down woody debris. Scientists have described large and old trees as the ecological backbone of dry and mesic forests (Franklin and Johnson 2012, Hessburg et al. 2015, Stine et al. 2014). Old trees have distinct qualities related to crown structure, bark thickness and color, heartwood content, and decadence which take a century or more to develop. Large old trees are the primary source of large snags and down wood, which support a broad diversity of species across forest types. In fire prone forests, large old Douglas-fir and other fire adapted species are most likely to survive fire events, and serve an important role in post-fire recovery ecological processes.

Retention of large or old leave trees as ecological legacies has conventionally been implemented

through the use of diameter limits. However, retention of trees at or beyond a specific age threshold is gaining traction in the scientific literature (e.g. Johnson and Franklin 2009). While no single age or diameter can define these biological legacies, age thresholds and diameter limits can help facilitate the conservation of the most desirable leave trees.



We suggest retention of all trees (regardless of species) that are 150 years of age or more. This is the age threshold used to define old growth trees in the Eastern Montana Zone (Green et al., 2011). Limber pine is a notable exception (120 years).

We do not envision that the age threshold would require the Forest Service to bore every tree. Instead, Johnson and Franklin (2009) offer a method for implementing the age threshold (see pages 26 and 27). Stand exam data collected for timber sale planning can also reveal the average diameter of 150-year old trees by species, stand, or site, which may then be applied to the project.

Roadless Areas

We support the proposed use of prescribed fire in the project area. Prescribed fire will more closely mimic a natural disturbance than mechanical treatments. However, the EA should include additional information about the extent of any mechanical fuel treatment for burn preparation.

Conifer Encroachment

We support the removal of young fast growing trees that have encroached into riparian areas. However we do not support the removal of the big old trees that have been a part of the riparian habitat for many decades. Identifying an age threshold that makes sense for the area would be appropriate, maybe retaining trees 60-70 years and older.

Thank you for considering these comments. We look forward to continuing to participate in this project as it moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Cleveland".

Emily Cleveland
Senior Field Director
Montana Wilderness Association

References

Green, P., Joy, J., Sirucek, D., Hann, W., Zack, A., and B. Naumann. 2011. Old-growth forest



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Franklin, C.M.A., Macdonald, S.E. and Nielsen, S.E. (2018), Combining aggregated and dispersed tree retention harvesting for conservation of vascular plant communities. *Ecol Appl*, 28: 1830-1840. doi:10.1002/eap.1774

Johnson, K.N. and J.F. Franklin. 2009. Restoration of federal forests in the Pacific Northwest: Strategies and management implications.

<http://www.forestry.oregonstate.edu/cof/fs/PDFs/RestorationOfFederalForestsInThePacificNorthwest.pdf>