

September 20, 2021

Flathead National Forest Supervisor

Attn: Gary Blazejewski

Flathead Fuel Break Categorical Exclusion Project #64699

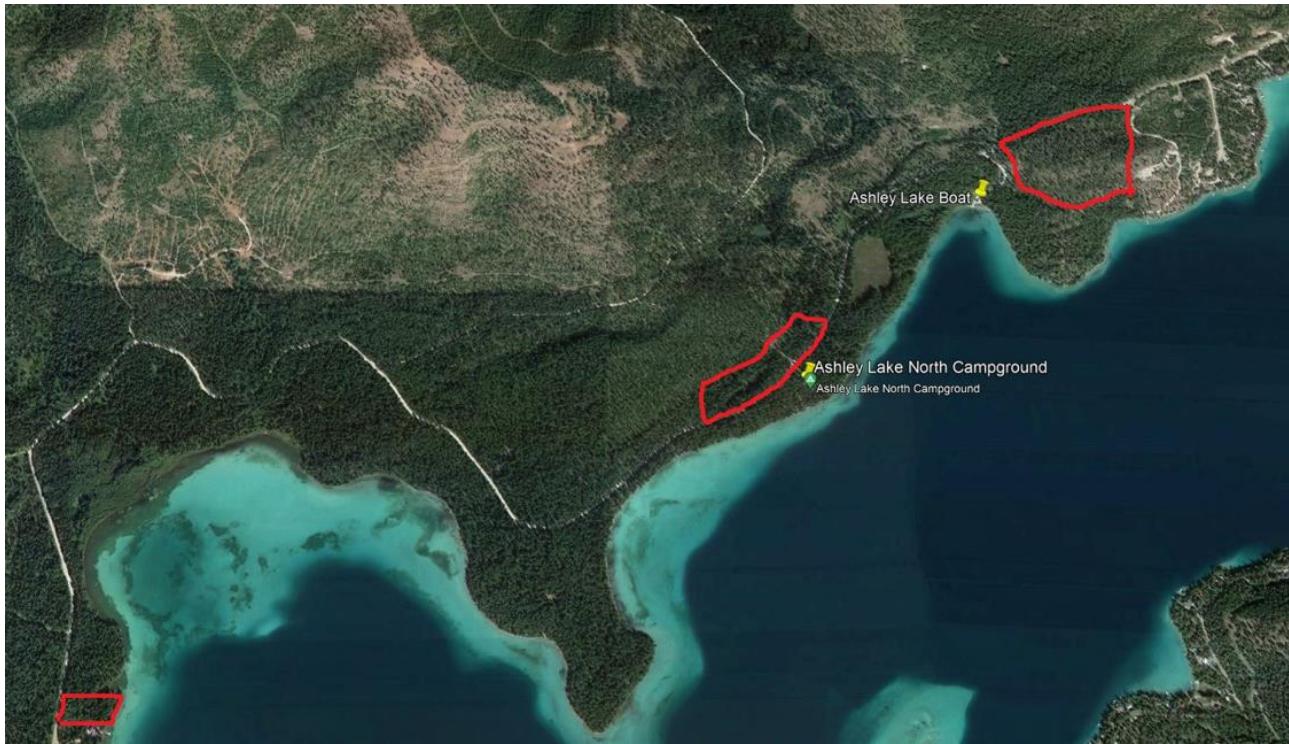
Thank you for the opportunity to comment on the Flathead Fuel Break Project. We are commenting as private citizens and are unaffiliated with any organization. We both have decades of professional experience in natural resource management in northwest Montana and have also worked many roles in wildfire suppression, including as fire crew. We are both familiar with on-the-ground conditions in many of the proposed fuel reduction units that are shown on your map for this proposal.

We appreciate your efforts to reduce the risk of fire to communities at risk across the landscape and we support many of the fuel break treatment units that you propose. However, we recommend modifications of some of the units in the Good Creek and Ashley areas as described below in hopes that the project can be consistent with Flathead National Forest's Forest Plan direction and can thus qualify for categorical exclusion from NEPA. According to Section 40806 of the Bipartisan Infrastructure Law, Establishment of Fuel Breaks in Forests and Other Wildland Vegetation, the fuel-reduction projects cannot qualify for categorical exclusion "in an area in which carrying out the activity would be inconsistent with the applicable land management plan or resource management plan." Based on our on-the-ground knowledge, we believe some of the proposed treatments in the Good Creek and Ashley Lake areas are inconsistent with the Flathead National Forest Plan with respect to applicable direction for old growth, riparian areas, and scenic integrity. Consistent with Section 40806 of the Bipartisan Infrastructure Law, we assume treatment areas would be no more than 1000 feet wide adjacent to roads and structures, or less if adjacent to old growth forest or riparian areas as specified in the Forest Plan.

Due to the high stand density and fire risk to the community of Coram, the fuel break treatments in the **Lion Hill Area** make sense to us as proposed. The treatment areas there avoided wetter areas and make sense in conjunction with past harvest.

In the **Good Creek drainage**, we suggest the treatment areas focus on creating fuel breaks north of the Good Creek Road. South of that road and adjacent to Good Creek itself, shrub and small tree cover is particularly important for wildlife. Additionally, proposed treatments in the easternmost part of the Good Creek drainage contain scattered small wetlands and thus have the wetland concerns that we further discuss below. Treatment boundaries should not include wetlands, and treatments close to these wet areas should be restricted to areas adjacent to structures. In the Greg Creek area, some of the proposed treatment areas are riparian and some have numerous large trees. These areas should be field surveyed for riparian conditions and to see if they still qualify as old growth forest. In addition, some of the areas proposed are quite a distance from houses or private lands. We suggest the units be redrawn in this area.

In the **Ashley Lake area**, the treatment area boundaries should be modified due to presence of old growth forest, wetlands, scenic integrity, and other wildlife considerations discussed below. We recommend limiting fuel break treatment in the Ashley Lake area to the three areas drawn in red on this satellite image:



WETLANDS

Some of the proposed treatment areas in the Good Creek, Gregg Creek, and Ashley Lake areas contain wetland habitats. These proposed treatment areas are also used in winter by big game species such as moose and deer. In the Ashley Lake area, the treatment unit is adjacent to and surrounds areas where loons nest. Proposed treatment areas support old growth forest with very large cottonwood trees with scattered small wetlands and a high water table, and bald eagles have nested in these very large cottonwoods on the most prominent peninsula.

The Flathead National Forest Plan includes the following applicable riparian management direction:

Category 4a -- Ponds, lakes, reservoirs, and wetlands greater than 0.5 acre and all sizes of *howellia* ponds and fens/peatlands: Riparian management zones consist of the body of water or wetland and the area to the outer edges of the riparian vegetation; or to the extent of the seasonally saturated soil; or to the distance of the height of one site-potential tree; or 300 feet slope distance from the edge of the maximum pool elevation of constructed ponds and reservoirs or from the edge of the wetland, pond, or lake—whichever is greatest. The inner riparian management zones are defined as follows:

- ◆ For category 4a and 4b ponds, lakes, reservoirs, and wetlands, the width of the inner riparian management zone shall be a minimum of 50 feet except for peatlands, fens, and bogs, where the minimum width is 300 feet.

We believe proposed treatment boundaries should be modified because they are not within 300 feet of private property boundaries that have infrastructure (such as homes) nor are the treatment areas adjacent to Ashley Lake campground. Proposed treatments would not restore or enhance riparian-associated resources and we do not believe exceptions are warranted unless the boundaries of treatment areas are

modified (see our suggested boundaries on the attached Google Earth images). As stated in the Forest plan:

The following standard applies to the inner riparian management zone for all categories except peatlands, fens, and bogs within category 4a:

06 Vegetation management shall only occur in the inner riparian management zone in order to restore or enhance aquatic and riparian-associated resources. Exceptions may occur as long as aquatic and riparian-associated resources are maintained. Exceptions shall be limited to (1) non-mechanical treatments such as prescribed fire, sapling thinning, or hand fuel reduction treatments; (2) mechanical fuel reduction treatments in the wildland-urban interface within 300 feet of private property boundaries; or (3) treatments that address human safety hazards (e.g., hazard trees) adjacent to infrastructure or within administrative or developed recreation sites.

OLD GROWTH

The Flathead National Forest Plan includes the following definition:

old-growth forest: A community of forest vegetation that is distinguished by large, old trees and related structural attributes occurring at levels that meet descriptions of old-growth forest types for the USDA Forest Service Northern Region (Green et al., 2011) and that provides habitat for old-growth-associated species. The primary measurable criteria that define old-growth forest in the Northern Region are basal area, trees per acre, size (d.b.h.), and age. Associated structural attributes for determining old-growth forest include the amount of dead/broken tops and decayed trees, amount and size of downed wood, and number of canopy layers (canopy layer diversity). Green et al. provide direction on the use and application of the old-growth forest definitions at the project level (see pp. 11-12). Refer to appendix C of the forest plan for more information on applying forest plan direction related to old-growth forest.

The minimum criteria of large tree age, trees per acre, and basal area cannot on their own be used to determine whether a stand is currently old-growth forest nor can they predict that a stand would still be old-growth forest after treatment. Green et al. itself includes these statements:

Because of the great variation in old growth stand structures, no set of numbers can be relied upon to correctly classify every stand. In addition, the uncertainties of sampling and statistics introduce another need for caution in using stand data. The minimum criteria in the "tables of old growth type characteristics" are meant to be used as a screening device to select stands that may be suitable for management as old growth, and the associated characteristics are meant to be used as a guideline to evaluate initially selected stands. They are also meant to serve as a common set of terms for old growth inventories.

The basic concept is that old growth should represent "the late stages of stand development . . . distinguished by old trees and related structural attributes."

The last sentence of the Forest Plan's definition of old-growth forest (quoted above) ties to the Plan's Appendix C, which includes the following:

A crucial point is the expectation that interpretation and flexibility will be applied at the project level to identify old-growth forest, using field surveys to discern structural characteristics (both the numerical criteria and associated characteristics). Reasons for this include the great variation in old-growth stand structures and the uncertainties that may be associated with sampling and statistics, as discussed in Green et al. The specific forest conditions required to qualify as old-growth forest, and the associated characteristics that influence its quality (such as snags, defective live trees, and downed wood), may be unevenly distributed and thus not accurately estimated through statistical means. When verifying old-growth forest, wildlife and vegetation specialists (e.g., silviculturists) are expected to contribute their professional judgement and work cooperatively in field review and analysis at the project level.

It is important to note that the proposed fuel break treatment in this old growth habitat would diminish the associated structural attributes such that existing old-growth forest could **no longer function as old growth habitat nor could it meet old-growth forest definitions**. This would be the case no matter which Western Montana old growth type (Green et al. 2011) that these stands are determined to belong in. The cottonwood old growth in the Ashley Lake area is the result of a high water table and the Forest Plan documents that this type is rare on Flathead National Forest lands. This forest type was not defined by criteria in Green et al. 2011, but it does have the structural attributes listed above.

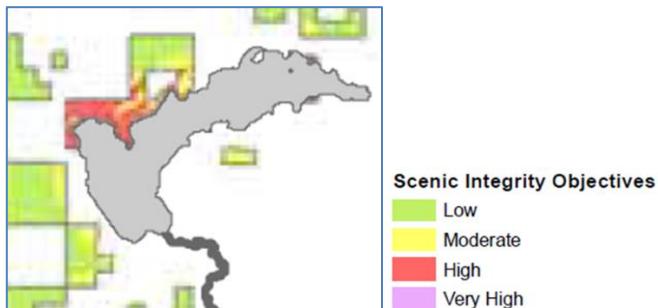
We request that on-the-ground surveys be conducted to identify and delineate old-growth forest in the Ashley and Good Creek areas, and that all areas of old growth be removed from treatment areas unless they are 300 feet or less from structures.

SCENIC VALUES

Finally, the Ashley Lake proposed treatments are in areas that are mapped in the Forest Plan as having high and very high scenic integrity. Forest Plan direction FW-DC-SCN and FW-GDL-SCN applies:

Scenic integrity objectives in the Forest Plan:

- very high integrity: The valued scenery appears natural or unaltered. Only minute visual disturbances to the valued scenery, if any, are present.
- high integrity: The valued scenery appears natural or unaltered, yet visual disturbances are present; however, they remain unnoticed because they repeat the form, line, color, texture, pattern, and scale of the valued scenery.



Please modify the units around Ashley Lake to meet Plan direction for scenic integrity or explain how a 1000-foot wide fuel break across the entire proposed unit area could meet these objectives.

ADDITIONAL WILDLIFE CONCERNS

Additionally, we request that you incorporate all of the following Forest Plan direction into the project design for the Ashley Lake area:

Wildlife Species	Flathead National Forest Species-specific Plan Direction
Bald eagle	FW-GDL-WL DIV-02 – Visual screening buffer around nest areas FW-GDL-WL DIV-05 (Table 15 Line 3) – Disturbance near nests FW-GDL-TE&V-10 – Large trees in nesting and roosting habitat FW-DC-WL DIV-01 (Table 14 Line 1) – Large trees, no nest harassment
Big game	FW-GDL-WL DIV-01 – Snow intercept in key winter habitat FW-DC-TE&V-08 – Warm-moist coniferous forest winter habitat
Common loon	FW-GDL-WL DIV-05 (Table 15 Line 4) – Disturbance near nest/nursery areas FW-DC-WL DIV-01 (Table 14 Line 2) – Nest habitat, no nest harassment

Thank you,

/s/ M. Reed Kaennen

/s/ Amy Jacobs