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Lolo National Forest Revision Team
Transmitted via email to
SM.FS.LNFRevision @usda.gov

Dear LNF Revision Team,

I submitted these comments to Amanda Milburn on July 8 and I know she uploaded them to you.

I thought it would be helpful to a reviewer if I cleaned up the format a little. So I have submitted it again, if you'd like to use it. There is no change in the content at all.

Thanks so much,


Mike Kantor

Comments on the Lolo National Forest Draft Assessment and Proposed Species of Conservation Concern

Old Growth

I deeply appreciate the difficulty LNF staff face in attempting to set policies while balancing competing demands on the resources of the Forest. At the same time, I want to express my very real concern that current trends in old growth indicate that old forest is an increasingly endangered habitat, and that species associated with old growth are increasingly at risk on the LNF. In my opinion, this is indicated by the Draft Assessment, the 1986 Forest Plan, and the research literature. The present trend may also be at odds with the President's Executive Order 14072 to conserve old forest.

The Draft Assessment itself (p. 76) writes of the value of old growth very well: "most scientists agree that old forests and large trees are key components of resilient forest ecosystems that should be a priority for conservation." (Franklin and Speis 1991, Speis et al 2004, Hessburgh et al. 2015, Lutz et al. 2018, DellaSala et al. 2022, Barnett 2023) As old-growth forests

disappear, attendant wildlife species may be eliminated from broad areas. (Meslow and Wight 1975).

The LNF Draft Assessment defines old growth as “ Old growth encompasses the later stages of stand development. They typically differ from earlier stages in a variety of characteristics, which may include tree size, accumulation of dead woody material, number of canopy layers, species composition, and ecosystem functions. “ (p. 74).

In the Lolo National Forest “old growth currently represents about 8% of the forested area and is distributed across vegetation types.” Draft Assessment at p. 74-75.

The Draft Assessment states that it is “likely that old growth is less abundant than it was historically” (p 76). It further reports that old growth has decreased dramatically in the last few decades. “The 2021 biennial monitoring report for the LNF as compared with the most recent prior data set (Hybrid 2022 ,representing 2003 to 2011) shows a reduction of approximately 18,000 acres of old growth.” (p. 77. My emphasis added)

Under the current Forest Plan (1986) 8% old growth was allocated to most of 71 drainages where wilderness was not available. Final EIS at II-61. These areas were designated Management Area 21. I have long been concerned that 8 % is likely much too small.

For example, as I understand it, under the 1986 Plan, The LNF predicted that due to timber harvests some old growth species would be extirpated and others reduced below minimum viable populations:

“Mature Old Growth with Limited Management. These species are at 70 percent of potential population levels and declining as harvests remove more of the old-growth timber. The current depletion of old growth will reduce population levels to 20 to 30 percent of potential , with one or two species extirpated at the Forest level by 2030. The species in this group can adapt only to limited management activities, such as light thinning “ EIS (I) at VI-18.

“Natural Old Growth. Population Levels are 70 percent on the east half and 40 percent on the west half of the Forest, for an average of 55% of potential. These species have a very low tolerance to management activities and at present rate of old-growth reduction, population levels will drop to 15 to 20 percent of potential and two to three species will be extirpated on the Forest by the year 2030.” EIS (I) at VI-18.

Again, as I understand it, the 1986 Forest Plan based its decision to allocate 8 percent of the Forest as old growth was based in part on habitat requirements of the pileated woodpecker, *Dryocopus pileatus*. The LNF selected the pileated woodpecker as the Indicator Species for “Mature Old Growth with Limited Management” . EIS (I) at VI-17. Local research suggested that sustaining populations of this species required a bare minimum of 10 percent old growth with units of at least 50-100 acres connected with forest corridors at least 300 ft

wide.(McClelland et al. 1979, McClelland 1980). Ideally, much more than 10 percent should be set aside. (McClelland personal communication in 1986). Based on McClelland's research, 8 % old growth seems likely, over time, to reduce pileated woodpecker populations to vulnerable levels.

As I understand it, the 8 % was justified , at least in part, on an Oregon pileated woodpecker study which proposed a 5% old growth allocation. (Bull 1978). Using results from another region to lower a species's habitat requirements can only be done with extreme care. Pileated territories in the region of Bull's study were the smallest found anywhere in the West. The study area provided a very rich habitat for cavity-nesters (Jack Ward Thomas personal communication in 1986).

The fisher, *Pekania pennanti* – currently and very appropriately selected by the LNF as a potential species of conservation concern (SCC)– and the goshawk *Accipiter gentilis* were selected as representative species of "Natural Old Growth " in the 1986 Plan. EIS(I) at VI-17. The goshawk was also designated as the indicator species.

I won't attempt to belabor you guys with all the literature on these species (a literature you know far better than I do !) but it suggests to me that 8% old growth may be less than adequate to maintain them. Both species are associated with old growth or later seral forest stages for some of their life cycle and appear to require areas of extensive closed canopy.(>60 % canopy closure) over extensive areas.

The fisher in particular appears to be at risk over the long term with the 8% old growth allocation. Although fishers utilize other forest besides old growth , late seral stages are a key component of their denning habitat, and connectivity of habitat is an important consideration. Fishers are obligate users of tree cavities in large trees and snags for reproductive dens throughout North America (Powell and Zielinski 1994)–“In the Northern Rockies the species occupies large home ranges, and does not generally occupy disconnected or small habitat patches, which may prevent the species from increasing in distribution and abundance within the plan area...” SCC Rational for determination at p 47.

I'd like to suggest that in order to address the dwindling of old growth forests and associated species on the LNF, a change in direction in old growth management from 1986 would be helpful. (In addition continuing some good things from 1986).

I suggest that the new Forest plan please consider the following:

1. Increase the area allotted to old growth forest substantially from 8 % to somewhere in the 16% neighborhood. These areas would be adequately connected by corridors with high canopy closure.
2. Old growth continues to be managed in dedicated Management Areas as in 1986 as opposed to any sort of floating or rotational approach experimented with in some

4.

National Forests. In my opinion, only dedicated areas will offer the long term protection for the extremely long time periods old growth requires to develop. (In some cases a minimum of 200 years in some forest types.)

3. Along those lines , MA 21 areas as designated in the 1986 Plan would be continued at the current sites allocated in 1986 and be established in perpetuity. Old Growth is a complex ecosystem established over long periods of time. The most effective approach is to “conserve an adequate supply of present stands and leave them alone.” (Hunter,1989) .

4. It seems best that old growth management areas be withdrawn from timber management with the exception of lower elevation Ponderosa pine stands requiring some thinning and prescribed burning to replicate the historic role of low intensity fire.

5. Protect Old growth management areas from firewood cutting using road closures as needed. Large snags are avidly harvested by firewood cutters and are a crucial component of old growth (McClelland 1980) Timber harvest and Human access can have substantial impacts on snag density , distribution, and longevity. (Wisdom and Bate 2008 in Draft Assessment p78). During the last 15 years the Forest produced approximately 244 million board feet of firewood, and from 2003-2013 , demand for firewood steadily increased. Draft Assessment at p. 337.

Large snags (exceeding 20” dbh) are critical nesting habitat for a number of larger cavity nesting birds species (McClelland 1977, McClelland 1980 :Bull 1975; Thomas1979) and provide optimal nesting habitat for virtually all cavity nesters species . Large snags and large coarse woody debris associated with them also provide important denning sites for many mammals including the fisher .

Proposed Species of Conservation Concern and Management Indicator Species (“Focal Species”). As relates to old growth and snag habitat.

I am a little concerned that given all the pressures these habitats will face in the next 20-40-years, the species closely associated with old growth and with the more broadly distributed resource of large snags are mostly unrepresented as species of conservation concern. These species include the Flammulated Owl, Boreal Owl, Northern Goshawk, Brown Creeper, Lewis’s Woodpecker, Black Backed Woodpecker, and Pacific Wren.

In addition to the concerns I already presented regarding old growth species, snag users in general may also be at risk under current trends. According to the the 1986 Forst plan:

" Snag Users. These species are at 60 percent of potential population levels. Under current management, this level would drop to 30 percent and level off by the year 2000. There would probably be no loss of species but this possibility exists" EIS (I) at VI-18.)

Fisher *Pekania pennanti*

A big thank you to Travis Fontaine and the other wildlife biologists on the LNF for listing the fisher as a proposed species of conservation concern . In my opinion, a great decision and likewise a great and exhaustive literature review justifying the decision.

Of course, the fisher is having a hard time of it in the West. (I noticed recently that the USFWS has agreed to reconsider protection under the Endangered Species Act for Northern California and Southern Oregon Fisher populations.) On the LNF, as the Potential SCC Rationale put it : " the species is extremely rare and has a distribution that is limited to the western extent of the plan area."

Pileated woodpecker *Dryocopus pileatus* as a Focal Species or MIS

I'm kind of following up on the Virtual meeting where Amanda, T.J. and I talked a bit about this.

Returning to Riley McClelland's western Montana research once again, "the elimination of old growth from wide areas in the northern Rocky Mountains will leave many areas devoid of pileateds." (McClelland 1979). He proposed the species be selected as a management indicator species for cavity nesting birds, snag habitat, and old growth. (personal communication 1986).

The pileated is the most sensitive of cavity nesters to timber management. Pileated woodpeckers only nested in stands with an old growth component, required snags or live trees with heartwood decay greater than 20" dbh, and the mean dbh 54 pileated nest trees was 29.5 inches; pileateds spend most of their feeding time in forests with an old-growth component and high basal area. (McClelland 1977; McClelland 1980).

The Pileated has considerable value as a Focal species because it also functions as a keystone species, providing nesting and denning habitat for many secondary cavity nesters and mammals (McClelland 1977; Thomas 1979). Notably, the pileated may provide denning habitat structures for the fisher. (Aubry K.B. and C.M.,Raley 2002.)

Thank you for this opportunity to comment on all your hard work. I really appreciate it and look forward to meeting with you in person to talk it over further!

Sincerely,



Mike Kantor

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