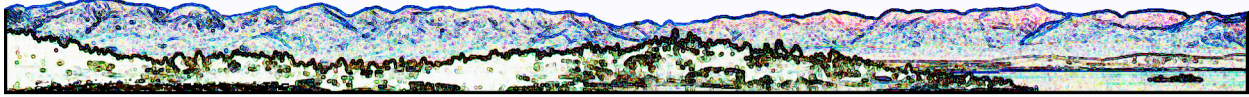


# Swan View Coalition *Nature and Human Nature on the Same Path*



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May 22, 2020

Swan Lake Ranger District  
Attn: Blowdown  
200 Ranger Station Road  
Bigfork, MT 59911

Re: Comments on proposed March Madness Blowdown Salvage Project  
Submitted to [comments-northern-flathead-swan-lake@usda.gov](mailto:comments-northern-flathead-swan-lake@usda.gov)

Dear Folks at SLRD;

We are very disappointed to see you using the fear of fire to promote the “salvage” of logs from trees blown down this winter and spring. You need to let the public know that salvage logging will remove the parts of the trees that don’t burn (the large tree trunks) and leave behind the parts that do burn (limbs, needles and smaller trees) as logging slash.

You recently logged the proposed Sixmile salvage units via the Sixmile Fuels Reduction Project, which thinned these stands and made them more susceptible to subsequent blowdown as winds more easily penetrate the opened canopy. Now you want to do more “fuels reduction” of the blowdown trees that instead leaves the burnable fuels while stealing as logs the carbon sequestered in the fire-resistant tree trunks. When will this end; when all the trees are gone?

It is time to stop this downward spiral in carbon sequestration and spreading of invasive weeds that “fuels reduction” and “salvage” logging sets in motion. Studies show as little as 15% of a tree’s carbon ends up stored (though short term) as a wood product, with the equivalent of 85% emitted to the atmosphere through the burning of logging slash, mill residue and transportation fuels. [1, 2]

On the contrary, only 5% or less of the carbon in a large tree is released to the atmosphere during a fire because most of it remains stored in the unburned tree trunk as the limbs and needles burn (along with forest floor plants, litter and duff). [3, 4, 5] We ask that you leave these blowdown tree trunks in place as much as possible, removing or moving aside only those portions necessary to clear roads and trails. Allow these tree trunks to replenish the soil and to provide habitat for essential life from microbes to wildlife, including the insects that birds depend on, as nature intended. [6]

If your goal is to truly reduce the flammable fine fuels found in the limbs, needles and small trees, then please do this by hand-slashing, hand-piling and burning them. Areas like the Sixmile units have already had the soils scarified, compacted and opened up to invasive weed seed by large logging equipment. They don’t need a repeat.

You heard loud and clear during the “collaborative” planning of the Weed Lake Landscape Restoration Project that the Swan Lake neighborhood is angry and tired of the spread of invasive weeds via logging and road building like that in the Sixmile Fuels Reduction Project. Public forests are for storing carbon to abate climate change, not for stealing carbon through logging that degrades forest ecosystems and makes climate change worse.

Should you persist in removing logs from these blowdown areas, please consider the following:

A. Do not damage the Hall Lake Trail and its neighboring wet areas and seeps. Do not expand the Section 12 logging unit eastward into the Inventoried Roadless Area, which moves onto steeper slopes and violates the IRA. The Sixmile Project apparently respected the IRA boundary and stayed out of it (according to its map).

B. Do not damage the Bond Creek Trail and its neighboring wet areas and seeps.

C. Do not haul logs out of the Patterson Creek area via the old Forest Service roads stemming from Bear Creek Road, which are prone to seeps, springs and failed or removed bridges over Patterson and Peterson Creeks. Haul them instead out the DNRC roads that connect with Hwy 83 and are located between these two creeks.

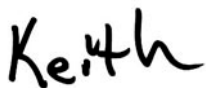
C. Do not damage the Phillips Trail, Beardance Trail or Crane Creek Trail.

D. We appreciate you have not proposed blowdown salvage in the Krause Basin - Peters Ridge area.

In summary, we encourage you to be honest with the public about how fuels reduction and salvage logging can compound the very problems they are proposed to solve or mitigate. Following the “logic” of these fuels reduction and salvage projects, the public’s forest will not be deemed healthy and safe until there are no trees/fuels left. We ask that you prepare an Environmental Assessment to determine whether the effects of your proposal are significant enough to warrant the preparation of an Environmental Impact Statement.

While we appreciate the invite to the May 30 field tours, your invite says nothing about COVID-19 protective measures or the size of group that will be allowed. How will you ensure the group size does not exceed the 10 person maximum under Governor Bullock’s current order, insure adequate social distancing of participants, and assure participants that all others in the group will be wearing face masks?

Sincerely,



Keith J. Hammer  
Chair

## Endnotes

1. Smith, James E.; Heath, Linda S.; Skog, Kenneth E.; Birdsey, Richard A. 2006. Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.
2. Gower, Stith T. 2003. Patterns and mechanisms of the forest carbon cycle. *Annu. Rev. Environ. Resour.* 2003. 28:169–204.
3. Meigs, Garret W.; Donato, Daniel C.; Campbell, John L.; Martin, Jonathan G.; Law, Beverly E. 2009. Forest fire impacts on carbon update, storage, and emission: the role of burn severity in the Eastern Cascades, Oregon. *Ecosystems online* October 30, 2009.
4. Campbell, John; Donato, Dan; Azuma, David; Law, Beverly. 2007. Pyrogenic carbon emission from a large fire in Oregon, United States. *Journal of Geophysical Research*, Vol. 112, G040414.
5. Law, Beverly. 2015. Personal communication 10/26/15.
6. Jones, Arwyne (lead editor). 2010. European atlas of soil biodiversity. <https://esdac.jrc.ec.europa.eu/content/atlas-soil-biodiversity>