



March 6, 2001

Tom Clifford, Forest Supervisor
Helena National Forest
2880 Skyway
Helena, MT 59601

Re: Salvage harvest of burned trees.

Dear Mr. Clifford:

The Land Management Committee of the Montana Chapter of the American Fisheries Society (MCAFS) has been reviewing environmental documents relating to management activities on public lands since the late 1980's. This committee, comprised of fisheries professionals living and working in Montana, reviews proposals with potential fishery implications to ensure that potential impacts to Montana's fishery resources are considered in the decision-making process.

Considering the large number of proposals to conduct salvage logging in burned areas throughout Montana, and the relatively short time-frame to conduct environmental analyses on these projects, MCAFS is attempting to ensure that watershed and fisheries concerns are given due consideration in the review process. Thus, MCAFS is requesting that all public notices ranging from scoping documents to final EA's be sent to the Chairperson of the Land Management Committee at the following address:

Ron Spoon
Land Management Chair, MCAFS
P.O. Box 1137
Townsend, MT 59644
Phone: 266-4237

The primary purpose for MCAFS requesting salvage logging proposals from each land management jurisdiction in Montana is to attempt to provide consistent fisheries/watershed input to the variety of federal and state agencies conducting salvage logging operations. Our

professional organization believes that moderate levels of salvage logging done properly can be compatible with fisheries and watershed health in many areas. Given the degree of potential soil erosion following the fires of 2000, however, we believe that a very conservative approach to harvesting burned timber should be used and that projects should be evaluated on the premise that harvest of burned trees be conducted in a manner that does not exacerbate erosion concerns due to fire. The primary issues of concern that will be evaluated by the Land Management Committee of MCAFS are:

- **Timber Harvest Near Streams:** Avoid harvest activities within 300 ft of active streams to promote future recruitment of woody material to stream channels and to provide a buffer zone to reduce sediment delivery to streams;
- **Watershed Restoration:** Road and stream crossing restoration projects to reduce sediment delivery and fish passage concerns should be considered as opportunities made possible by salvage proposals;
- **Harvest Techniques:** Timber harvest techniques and timing that minimize soil disturbance and erosion should be selected whenever possible (winter logging should be promoted to reduce soil movement, particularly on steep slopes with erosive soil types);

- **Roads:** There should be no new road construction to conduct salvage logging, and all roads used for hauling should be upgraded to meet BMP standards.
- **Livestock Grazing:** Cattle use in burned areas should be deferred until vegetation has adequately recovered and a long-term evaluation of riparian grazing should be conducted in burned areas to determine potential for riparian enhancement;
- **Weeds:** Post-fire weed management must strike a balance between the impacts of invading weeds and the delivery of herbicides to surface waters.
- **Stream Crossings:** Stream crossings associated with haul roads should be assessed to assure fish passage and sized to meet the 100-yr flood flow.

The Montana Chapter of the American Fisheries Society anticipates receiving notices for all of your post-fire projects and we ask that you forward this request to the appropriate district offices. It is the intention of the Land Management Committee of MCAFS to provide a thorough and professional review of these projects with emphasis on highlighting important fishery issues and providing comments to reduce potential impacts to the watershed and associated fishery resources due to salvage logging activities.

Sincerely,

Pat Clancey
President, MCAFS

c: Montana Department of Natural Resources and Conservation
Bitterroot National Forest
Lolo National Forest
Beaverhead-Deerlodge National Forest
Kootenai National Forest
Gallatin National Forest
Helena National Forest
Lewis and Clark National Forest
Bureau of Land Management

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