

A-Fisher Prey Species

The proposed treatments will impact fisher in at least 2 manners. The DEIS at 430-431 notes that logging and burning will reduce the red squirrel, the red-backed vole, and the snowshoe hare, all important prey species for the fisher.

B-Impact of Intermediate Harvest

The DEIS claims that only 9-12% of fisher habitat will be removed with the project, including logging and regeneration harvest. No impact is suggested for intermediate harvest (DEIS 413). This is incorrect, as the fisher relies upon complex forest structure, including the understory, and this understory will be removed with logging and burning. In addition, the fisher does not use habitat with less than 50% canopy, and this canopy level will not be met in many of the partial harvest units (although this information is never clearly provided).

Considering all impacts, from regeneration harvest to partial harvest to burning, from 25-38% of existing fisher habitat will be removed in the project. It appears that current habitat is about 38% of the landscape (DEIS xvi), but is more likely 35% (or less) which is forests with trees over 10 inches dbh as per Table 104. The DEIS at 279 indicates there are only 4,400 acres of fisher habitat in the Project Area, which would be only 18% habitat! If 2516 acres are degraded with treatment with Alternative 3, this would leave only 1884 acres of fisher habitat remaining, or 8%. Thus the Project will largely eliminate fisher habitat in this landscape.

C-Project Treatments

The agency did not define how much habitat is required on a landscape to allow persistence of fisher, so the impacts of the project are unknown but likely severe. The agency clearly did not take a hard look at project impacts as a result.

D-Fisher Viability

Given the agency's management regime which will remove over half of the existing fisher habitat in the Project Area, the agency needs to demonstrate that this is not a Forest-wide pattern, and that in spite of management in the Stonewall Project Area, fisher habitat is being maintained in occupied areas of the Helena Forest. However, it appears that the Stonewall Project Area is one of the limited areas that the fisher does occur on the Helena National Forest. So the agency has not demonstrated that the viability of this species will be maintained on the Forest due to the Stonewall Project.

E-Fragmented Habitat **A hard look was also clearly not taken due to the lack of assessment of fragmentation impacts on fisher.** They are known to avoid crossing openings greater than 82 feet wide, and prefer forest patches at least over 100 acres in size. The Project will create many movement barriers for the fisher, and reduce remaining habitat to potentially unusable levels for persistence. In addition, fisher at known to avoid using clearcuts until they are almost 50 years old. Thus **the impacts of clearcutting will be long term. These long term impacts were not addressed in the DEIS.**

F-Clearcutting

The removal of forest stands impacted by the mountain pine beetle will clearly be an adverse impact to fisher. Research in Idaho noted that older forest stands impacted by pine beetles were important winter habitat for fisher because of an abundance of logs.

17. Wolverine

A-Treatments **The DEIS at 73 noted that recent fires have reduce wolverine habitat on 23,000 acres (DEIS 406). Yet the Project proposes to burn several thousand more acres of wolverine habitat. The rationale for this ecosystem restoration was not provided.**

Past impacts of logging and fire on wolverine prey were not assessed.

B-Prey Species **The wolverine prey species include red squirrels and snowshoe hares (DEIS 275). All the proposed treatments will reduce both prey species, so the Project will have adverse impacts on wolverine foraging ability.**

C-Denning Habitat **The Project will burn almost 1,000 acres of wolverine denning habitat. This will also be an unnecessary adverse impact called ecosystem restoration.**

D-Biological Opinion **The agency failed to obtain a BiOp for these adverse impacts on wolverine, since the species will likely be listed prior to or during project implementation.**

A-continued **Forest thinning will cause earlier spring snow melt, thereby reducing habitat quality for the wolverine in treated areas.**

18. Shrubs

Big sagebrush is the dominate mountain shrubs in the Project Area (DEIS 256). Up to 700 or more acres of mountain shrub habitat will be burned in the Project.. Sagebrush is important habitat for many songbirds, as nesting/foraging habitat. It is also important as big game cover and forage. Open sagebrush areas with mixed conifers is also fall/winter habitat for the goshawk. No rationale was provided as to why sagebrush will be burned (destroyed) with ecosystem restoration. Fuels reduction that requires elimination of important wildlife habitat will have much higher adverse impacts that beneficial effects in fire reduction. The chances of a given area burning are extremely small, while the chances of habitat loss for wildlife benefiting from sagebrush are 100%.

19. Whitebark Pine

Whitebark pine will be logged and burned in the Project (e.g., DEIS at 141), even though it is a sensitive species that is a candidate species for listing under the ESA. The DEIS provided no rationale as to why this tree must be destroyed in order to restore ecosystems. If this species is listed during Project implementation, the agency will require a BiOp to address degradation and/or destruction of whitebark pine or nutcracker habitat.

As is noted in the DEIS at 253, whitebark pine depends upon the Clark's nutcracker for viability. Whitebark pine is only marginally used by this nutcracker, as lower elevation, more productive forests, including ponderosa pine, are the primary foraging areas for this bird. Thus conservation of whitebark pine (in addition to not actually destroying it with fire, or logging its habitat) depends on management of this nutcracker. There is no mention of a conservation strategy for the Clark's nutcracker in the DEIS. The DEIS at xviii claims that the Project will restore 4,200 acres of flammulated owl habitat. This logging/burning will also destroy Clark's nutcracker habitat by significantly reducing the conifer seed production that will occur on these acres. This will be a direct adverse impact on whitebark pine.

20. Flammulated Owl

The flammulated owl is noted to be listed not only as a sensitive species by the USFS, but as a high priority species by the Montana Steering Committee. Habitat in the Project Area is limited to approximately 1500

A-Breeding Habitat

acres (DEIS 286). The agency has no idea if these acres are currently occupied by this species. This comprises only 6% of the Project Area, which is very limited amount of habitat for any species. Yet the agency will log and burn at least 435 acres of this habitat, or about 30% of existing habitat. It is not clear why this will ensure continued suitable habitat levels for this species. No analysis was provided as to why this will still provide adequate breeding habitat for this species. So there is no basis for claiming that the Project will not threaten viability of this species in this portion of the landscape. In addition, the DEIS does not address Forest-wide management of flammulated owl habitat, and if enough habitat is being maintained to ensure Forest-wide viability. If other areas of the Forest that provide flammulated owl habitat are being managed in the same manner (reducing existing habitat to very low levels), then the viability of this species across the Forest is questionable.

B-Treatments

The DEIS also failed to address why the current level of flammulated owl habitat is so low. The impacts of past logging (cumulative effects) were never addressed. It is clear the agency failed to take a hard look on project impacts on this species, since historical levels of habitat were never identified. If losses have already been quite significant, additional losses will be much more significant, and alternative actions that would avoid additional losses would have been considered.

The DEIS at 423 notes that logging/burning may kill nesting/juvenile flammulated owls because no surveys have been done in the Project Area, even though this species has been documented in this landscape (DEIS 250).

C-Nesting Habitat

The DEIS at xviii claims that the Project will restore 4,200 acres of flammulated owl habitat. The basis for this claim was never provided. There is research on the Bitterroot National Forest where it was noted that some flammulated owls nested in old partial harvest units that were quite old. It was also noted that these units had retained more trees than partial harvest units that were not used by nesting flammulated owls. So it is clear that there is a given level of harvest that will make nesting habitat unsuitable. This possibility was never addressed in the DEIS. It was just assumed that any logging will improve/restore flammulated owl habitat. The Bitterroot study did not claim that logging restored flammulated owl habitat, just that some nesting habitat was maintained. This study also noted that just because owls were nesting in snags in these units did not mean the habitat quality was equal to unlogged areas. This would require a study of nesting productivity,

something that was not done in the study. So there is no evidence that logging in the Stonewall Project will maintain, let alone improve (restore) flammulated owl habitat.

D-Snags

The DEIS in the flammulated owl section claims that snag habitat in logged areas will meet the Northern Regional Snag Management Protocol, and thus will maintain owl habitat. The levels of snags required by this Protocol were not identified. However, they clearly exceed both the number and size of snags required by the Helena Forest Plan. If the agency tells the public they are using specific management recommendations for wildlife, then these recommendations have to be followed. There is no evidence this is being done for snags, including in flammulated owl habitat.

B-continued

The current best science indicates that understory and multiple canopies are typical of flammulated owl habitat. Both of these factors will be eliminated with burning and partial logging. Therefore, any claims that partial logging will maintain/restore owl habitat are false.

21. Migratory Songbirds

A-Closed-Canopy Forest

The Project will burn 13% of shrub habitat, and reduce closed canopy forests from 13,322 down to at least 9,907 acres (Table 87 at DEIS 344), or by 26%. The rationale for this reduction was never identified. It is not clear why this was chosen as an agency action, since this closed canopy forest is important for the goshawk, pileated woodpeckers (Forest MIS), the fisher (a Forest sensitive species), and lynx (a threatened species) (Id.). It is not clear why the pine marten was not included as a closed-canopy species, another Forest MIS. Also, priority species include the goshawk, pileated woodpecker, pine marten, lynx and fisher.

B-Treatments

The information provided in Table 87, DEIS 344, is vague and quite incorrect. The important factors that affect songbirds are not actually evaluated. These include at least 5 factors, including logging disturbance, hiding/thermal cover, conifer seed production, foraging substrate, and old growth.

There are at least 13 songbird species in Montana that are sensitive to logging and burning, and are generally only found in undisturbed forests. All of these species will be harmed by the Project.

Hiding and thermal cover, provided by dense forest canopies and structurally complex overstories and understories, are key to songbirds to protect them from inclement weather, especially in the early breeding season. In order to ensure successful reproduction, dense cover may be important to prevent predation, the most common cause of nest failure in songbirds. Hiding cover at the ground level is particularly critical to young songbirds when they fledge from the nest and are flightless for several days. If there is no hiding cover at this period, these young flightless birds will likely be killed by predators, or possibly by inclement weather due to a lack of thermal cover.

Clearcutting, burning and partial harvest will reduce the density of trees used as foraging substrate for most bird species, either on tree trunks or in the tree canopy, for insects. Forage reduction will also be reduced due to the agency's priority of reducing forest pests, as mountain pine beetles, Douglas-fir beetles, etc. Finally, forage for songbirds will be drastically reduced by a reduction in conifer seed production. There will be a huge reduction in the production of conifer seeds per acre, and this will also result in a huge reduction in songbird carrying capacity, including for priority species as the red crossbill, Cassin's finch, and Montana Species of Concern the Clark's nutcracker.

C-Old Growth

There was no analysis in the DEIS regarding the importance of old growth forests to many songbirds. Even though the Montana Partners in Flight 2000 report was cited (DEIS 250), the recommendation in there for 20-25% old growth for forest songbirds was not noted or considered.

B-continued

A number of migratory songbirds are associated with or benefited by sagebrush, such as the Brewer's sparrow, chipping sparrow, mountain bluebird, green-tailed towhee, Cassin's finch, and Loggerhead shrike. There was no specific rationale provided as to why sagebrush habitat will be burned with habitat loss for many species of songbirds. It is not clear why this would represent ecosystem restoration.

D-Cowbirds

The impact of cowbird parasitism due to forest clearcutting and partial harvest was not addressed in the DEIS. This can be a significant adverse impact on many songbirds. Given the almost total lack of analysis of Project impacts on songbirds, it is clear that the agency has not taken a hard look at any of the likely impacts of the Project on migratory songbirds.