

MINERAL COUNTY BOARD OF COMMISSIONERS



PO Box 550
Superior, MT 59872
Phone (406) 822.3577

mccommissioners@co.mineral.mt.us

Mineral County Resource Coalition

P.O. Box 730, Superior MT 59872

emily.park@montana.edu

VIA Email: comments-northern-clearwater-north-fork@usda.gov

April

North Fork Ranger District
Attn: District Ranger
12740 US HWY 12
Orofino, Idaho 83544

Subject: **Dead Laundry**

Andrew Skowlund, District Ranger,

These comments are being offered on behalf of the **Mineral County Resource Coalition (MCRC)** and the **Mineral County Commissioners (MCC)**. With an emphasis on Mineral County, the Mineral County Resource Coalition and the Mineral County Commissioners have worked together over the last 15 years to help improve the economic conditions in the rural counties across Western Montana.

With over 90% of its land base tied up in National Forest ownership, Mineral County has the highest percentage in all of Region 1, leaving us with less than 10% of our land base for our tax purposes. While their percentage may not be quite as high, many other forested rural counties across Western Montana face similar situations and we are all highly dependent on the resources provided by our National Forests for our economic structure with timber and recreation the primary drivers.

In addition to our focus on economics, MCRC and MCC support forest restoration projects that, promote good forest health, reduce the risk of uncharacteristic wildfires, improve access for firefighter and public safety, maintain or improves wildlife habitat, and improves protection of private property in the WUI.

Located less than an hour's drive from several communities in Mineral County, the North Fork District of the Clearwater National Forest provides opportunities in both timber and recreational resources that are very important to our economic structure. The sawmill in St. Regis, now owned by Idaho Forest Group (IFG), has a long history of working on the North Fork District and we are excited about the potential for future opportunities coming up on the North Fork District.

The Dead Laundry project area saw extensive logging activity in the 50's and 60's and some as late as the 80's, but very little activity since that time. As proposed, the purpose of this project is to reduce hazardous fuel loading and potential fire severity, improve firefighter safety, and protect private inholdings. Additionally, the project is designed to improve forest health and ecological function to move the forest toward desired future conditions.

The Purpose and Need for Action specifies three primary purposes why the project is being proposed.

- * Reduce hazardous fuel loading within the project area to provide protection for the wildland urban interface (WUI).
- * Harvest wood products to sustain local and regional economies.
- * Improve forest health and resiliency in concurrence with desired conditions and objectives identified in the Forest Plan.

We strongly support this project and the goals identified in the Purpose and Need for Action. We believe the following comments and suggestions will strengthen the project and improve how the project fulfills the objectives in the Purpose and Need for Action to comply with Forest Plan Direction.

- ◆ We believe a fourth item should be added to the Purpose and Need to recognize the importance of recreation in the project area. The only mention of recreation in the Project Proposal is with regard to road 250 under “Other Known Resource Concerns”.
 - ◇ We're thankful for the clear, cold waters of the North Fork and the native trout that make their living there. We recognize the need to manage forests and the forest transportation system in a way that protects the waters of the North Fork and its tributaries.
 - ◇ We are not entirely familiar with how recreation projects are paid for on the National Forests in Idaho, but we understand there are opportunities through the State Parks and Recreation for grants. Our collaborative can help with these grant proposals, and others that need to be applied for by the Forest Service. With recreation a primary economic driver, we respectfully request that the Forest make recreation a priority for this project and we offer our support in whatever capacity we can help.
 - ◇ As indicated in the proposal, road 250 provides access for multiple recreational opportunities along the NF Clearwater River. There are lots of dispersed camp sites along the river within the project area, some are improved and others are not. We believe something should be included in this project to set the wheels in motion to provide additional site improvements in more of these dispersed sites.
 - ◇ The project area has a good network of both motorized and non-motorized trails. We want to ensure that these trails are maintained as part of this project. All of these trails tie in with roads that are not maintained for passenger cars. The road activities proposed for this project do not designate any roads other than temporary roads to be decommissioned. It does however, indicate that there may be roads that will be rehabilitated and revegetated as needed to restore soil function and productivity. While we support most rehabilitation work, we want to ensure it does not change existing trail routes that tie in with roads such as roads 734, 734B, 735, 735B, 735C, 5440, and possibly others.
- ◆ With millions of acres of our National Forests considered to be at risk due to the effects of insects and disease, we cautiously watch projects to ensure we are accomplishing vegetation management at a scale that is making a meaningful difference. The Clearwater National Forest alone, has nearly one million acres considered to be at risk. The Dead Laundry project encompasses 40,565 acres with 5,797 acres or 14.3% of the project area proposed for commercial and non-commercial treatments combined. If history tells us anything, we know it could be decades before this area sees any substantial management in the future. With consideration to all resources, we would like to see at least 30% of the project area treated with this entry.

There are opportunities throughout the project area to accomplish more work commercially and non-commercially. Here is a list of just a few general areas we see as potential opportunities:

- ◇ The areas around the private property (WUI) currently planned for Mechanical Hand Treatment could include a combination of commercial thinning in conjunction with the proposed precommercial treatment.
- ◇ The area between road 250 on the west side, roads 735 and 735C on the East, road 295 on the north and 255 on the south has been heavily roaded in the past with most roads currently obliterated. Commercial units are proposed in the upper portion of this area south of road 295 but very little is planned in the lower portion. Road construction (presumably along previously decommissioned road templates) will be required to access these units. By utilizing these existing templates, this road could be extended down to the area east of road 255 and then up the east side of road 255 to the private property in-

holdings, providing access for vegetation management now and into the future.

- ◇ The area around Deception point over to the Wild Land Recreation/Backcountry Restoration boundary and over to road 5440 is also heavily roaded and provides some excellent opportunities to increase acres treated.
- ◆ We support road improvement, maintenance, and construction activities that utilize Best Management Practices for erosion control measures and that meet riparian management objectives. The proposal provides only general information about the type and quantity of work to be done and does not provide specifics about locations so our comments in regard to roads are very general.
 - ◇ Most of the project area has seen active management over the years and the area, for the most part, has been heavily roaded. With very little maintenance over the last 30 to 40 years, many of these roads have grown in and are no longer passable. With most of the proposed road work utilizing existing road templates, we support the road construction activities as proposed.
 - ◇ As proposed all temporary roads would be obliterated after the project is completed. Without knowing the locations for these roads, it is hard for us to respond to specific issues. However, what we can say is that 54 miles of temporary roads seem high, especially with 25 of those miles located on templates from legacy transportation routes. Apparently, these 25 miles of roads are located in areas that provided previous access for vegetation management and are once again in a location needed for management purposes. We respectfully ask that you take a close look at these road locations and consider leaving them in place for future management purposes.
 - ◇ Other than the reference to “Rehabilitate and revegetate disturbed soils as needed to restore soil functions and productivity”, there is no specific reference to any other road obliterations. We want to reiterate our request for you to carefully consider future management needs before any roads are permanently closed.

In closing, we want to thank the Forest for developing this project and providing us with the opportunity to comment. We look forward to working with you on this project in the future and would like to request that you put us on the mailing list to receive any further related correspondence.

Respectfully,

Willy Peck— Co-Chair Mineral County Resource Coalition

Carol Young— Co—Chair Mineral County Resource Coalition

Roman Zylawy—Chair Mineral County Board of Commissioners

Laurie Johnston— Mineral County Board of Commissioners

Duane Simons— Mineral County Board of Commissioners