
LINCOLN COUNTY

STATE OF MONTANA

MARK PECK, COMMISSIONER
DISTRICT NO. 1, LIBBY

JERRY BENNETT, COMMISSIONER
DISTRICT NO. 2, TROY

JOSH LETCHER, COMMISSIONER
DISTRICT NO. 3, EUREKA

ROBIN A. BENSON
CLERK OF THE BOARD AND COUNTY RECORDER

Support for Three River's District Black Ram Project

Greetings,

Thank you for the opportunity to comment of the 2020 draft Decision Notice for the Three River's District Black Ram project. The Lincoln County Commissioners support Ms. Kaiser's decision rational and the treatments as laid out in the notice.

The Black Ram project EA addresses the current ecological conditions of the project area well. The treatments planned will promote wildfire, insect, and disease vegetative resiliency, improve seral and old growth conditions, and encourage fire's ecological function on the landscape mimicking landscape-level vegetative patterns. The county supports large-scale, landscape treatment, and preservation of old growth forest components, including retention of large, seral tree species and large, downed woody debris. These treatments are needed, and the need is well established in the EA and the Decision Notice. We are pleased that approval has been given by the Regional Forester for some units to exceed the 40-acre size limitation and concur that some units in excess of 40-acres are needed on the landscape in this expansive area, whether by harvesting or prescribed fire.

As the Yaak experiences more growth and development, Wildland Urban Interface (WUI) fuel reduction treatments must increase. Completion of the fuels breaks that were started near the community of Yaak during the Davis Fire will help protect the area from future fires and build on work already accomplished. The planned treatments along Yaak Highway (#508) in the WUI protect private property, the powerline and egress from properties above Yaak for approximately one mile. The county would request the district do additional work all along the Yaak highway to create safer egress and escape routes in case of wildfire and create a zone of defense between the forest and the Yaak Meadows subdivision. We understand that any additional work will not be considered or occur under this decision, but we would encourage the district to make use of the CEs and the Good Neighbor Authority (GNA) provided by the 2018 Farm Bill to do additional work along the 508 and around the communities in the Yaak. Yaak Meadows subdivision is of particular concern to the county and all agencies responsible for fire protection as it lacks sufficient egress. We would ask that district staff pay extra attention to work that can be done in the WUI to help protect lives and property from wildfire in all future projects.

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In closing, we would like to acknowledge the important work that has been done on the district in this past year to bring about the changes necessary to allow the Black Ram project to move forward. We thank you for the extensive work and analysis that has gone into the Black Ram project and for consideration of our comments, now and in the past.

Again, thank you for the opportunity to comment.

Sincerely,

Mark Peck, Commissioner Jerry Bennett, Commissioner Josh Letcher, Commissioner
