

Norton, Michelle - FS, HAMILTON, MT

From: Park, Emily [REDACTED]
Sent: Thursday, May 19, 2022 11:16 AM
To: FS-comments-northern-bitterroot-stevensville
Cc: William Peck; Carol Young
Subject: [External Email]Bitterroot Front Comments
Attachments: Bitterroot front.pdf

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Thank you for the opportunity to submit the attached comments on behalf of the Mineral County Resource Coalition (MCRC).

Emily Park

Emily Park

**Extension Agent- Economic Development
MSU Extension Mineral County**

[REDACTED]
[REDACTED]
Superior, MT 59872

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Mineral County Resource Coalition

P.O. Box 730, Superior MT 59872

May 2022

Via Email: comments-northern-bitterroot-stevensville@usda.gov

Subject: Bitterroot Front Project

Stevensville Ranger Station, Attn: Steve Brown
88 Main Street
Stevensville, MT 59870

Dear Project Manager,

The Mineral County Resource Coalition (MCRC) would like to thank you for the opportunity to comment on the Bitterroot Front Project. With nearly 90 percent of the surface ownership in Mineral County held in National Forest System (NFS) lands, we rely heavily on the Natural Resources provided by our National Forests for our economic stability. As always, we continue to support projects that could contribute to our rural economies. The MCRC group has a long history of supporting project development and implementation on the Bitterroot National Forest, and we support the proposed Bitterroot Front Project.

Mineral County continues to have a strong forest products industry in the form of loggers, road builders, and trucking companies. Although not as robust as the now closed sawmill in St. Regis was, these jobs are more important than ever to our struggling economy. Additionally, some local residents have taken jobs with other forest products industries in other counties, and IFG still provides important jobs for a satellite crew in St. Regis. These jobs are of critical importance to our citizens and communities, and the Bitterroot National Forest continues to be an intricate part of the economic stability in Mineral County.

We support the Objectives and the purpose and need for this project as identified in the scoping document with some comments we hope will help accomplish these goals.

1. Too often, projects are designed in the early stages with restrictive language that makes it difficult to fully achieve management objectives during the layout and implementation phases of the project. Full implementation of this project will take several years and will undoubtedly see a variety of changing conditions. We would encourage the Forest to use language that provides flexibility in what and how equipment and treatment types are used to achieve management objectives. Advancements in equipment and logging methods in recent years have increased opportunities to access and treat more acres commercially with minimal ground disturbance. These same advancements also make it possible to use mechanized equipment to perform other non-commercial treatments in a safer manner on a much larger scale. We strongly recommend avoiding comments that restrict management options, such as regeneration harvest will be "less than 40 acres". While these types of statements may be popular, they may not allow appropriate silvicultural treatments to be implemented once stand diagnosis has been completed.
2. The lack of fire on the landscape and the warmer, dryer climate are certainly affecting wildfire activity. However, the lack of active forest management through commercial and other non-commercial treatments has also created undeniable consequences as well. The proposed action in the scoping document under vegetation and fuels management illustrates some of the benefits of recent and past commercial treatments.

Page 9, item 2 states that recent harvest units treated as part of 5 separate timber sales, as well as all regeneration harvests completed since 1980, were excluded from commercial harvest because they already meet desired species composition and stand density are already at a lower risk from severe wildfire and insect and disease impacts.

As proposed, the project will treat 55,133 acres with commercial treatments, over 38 percent of the project area. Of this, just over 13,000 acres are within Inventoried Roadless Areas. We support these management activities and want to thank the Forest for acknowledging the beneficial use of commercial treatments to achieve project objectives while recognizing the important role and obligation the Forest has to help sustain a viable local economy. In addition to these commercial treatments, thousands of additional acres will be treated non-commercially, creating additional job opportunities in our rural communities.

3. In addition to proposed commercial treatments, thousands of additional acres will be treated non-commercially, creating additional job opportunities in our rural communities. Non-commercial treatments are an essential part of the work needed to improve forest health and protect life, property, and communities from the effects of fire. We strongly support both commercial and non-commercial treatments. However, with unprecedented growth and new home construction extending to our forest boundaries, we believe fire should only be used in conjunction with other types of treatments or to achieve management objectives in areas that are inaccessible or do not allow commer-

cial treatments, and then only after other activities have been completed to maximize public and firefighter safety.

4. While we support the proposal to target smaller diameter trees for removal in the intermediate harvest units, we do not support the selection of leave trees based solely on size and age classes. Larger diameter trees can certainly be favored for leave trees, but in the end, in order to fully meet the purpose and need, leave trees should be selected based on health, structure, and species, which may include leaving a smaller, healthier tree in some cases. Additionally, In order to open the canopy up enough to effectively reduce the potential for the Forest to carry a crown fire, we recommend leaving a basal area of not more than 40 square feet per acre.
5. We support site preparation and tree planting throughout the project area as proposed to achieve desirable stocking levels. This should include any areas where previous fire activities do not meet minimum stocking levels.
6. We support the project-specific forest plan amendments proposed for this project. These amendments would modify elk habitat objectives, old-growth, coarse woody debris, and snag retention components within the forest plan for this project only.
7. In addition to our concerns with our rural community economics, we are equally as concerned about the forest health crisis we face on all our National Forests across Western Montana and the extreme wildfire risk that these conditions create within the Wildland Urban Interface (WUI). The 143,983-acre Bitterroot Front Project area is tightly tucked between the Selway Bitterroot Wilderness on the West and private property to the East and provides the last line of defense between fires that historically start in the Wilderness and move towards private property and communities to the East. With 99 percent of the surface ownership within the project area in NFS lands, and the extreme risk fire poses to public safety and personal property damage, the Forest has an opportunity, and an obligation, to implement a management strategy across this landscape that will maximize these desired outcomes and fully achieve project objectives.

Intact well-maintained road systems are crucial for managing our forests and providing access for both motorized and non-motorized recreation. We support all activities for improving road systems to address sediment impacts in streams and ensure the road system provides adequate access for land management activities and recreational use. We support the construction of new permanent roads in areas needed for this project and future management needs.

8. We have witnessed firsthand the effects deteriorating road systems have and are having on our forest managers' ability to effectively manage our forest resources. The Sunrise Fire in 2017, for example, was ignited by lightning in an area very close to an existing road, but the road had been effectively closed by vegetation growth and down timber. That, combined with the overstocked and downed timber, made quick access impossible and unsafe for first responders. Forest restoration projects are more expensive due to the costs associated with reconditioning or reconstructing roads that have not been maintained or obliterated without due consideration to future critical management needs.
9. Shaded fuel breaks along roads have been proven to improve public and firefighter safety and will provide an effective firebreak to help safely return fire to the landscape. We strongly support the concept of shaded fuel breaks along strategic roads within the project area. These fuel breaks should be wide enough to stop or slow down a fast-moving wildfire. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of crown fire and provide an additional opportunity for firefighters to stop fire spread. With so much of the area within the CPZ and WUI, it is important that ingress and egress roads are adequately thinned to allow traffic during a fire and to provide firebreaks. Additionally, these fuel breaks improve safety for public and firefighter ingress and egress.

Once fully implemented, the 143,983-acre project will achieve desired outcomes to improve forest health, improve landscape resistance and resiliency to the effects of insects, disease, and wildfire, provide for public and firefighter safety, reduce fire risk to communities, improve wildlife habitat, improve community economics by providing commercial forest products and creating jobs, and improve and increase recreational opportunities that also contribute to the economic stability of our rural communities.

Landscape-scale projects are essential if we ever hope to get ahead of the forest health crisis we face today, but we need to take a holistic approach. Once completed (if we managed aggressively today), this project will provide the opportunity to manage the Forest to address specific forest health issues in the future as they are identified on a much smaller scale.

Respectfully,

Mineral County Resource Coalition