

July 7, 2023

To: Land Management Plan Revision Web Hub

(<http://www.fs.usda.gov/detail/lolo/landmanagement/planning/?cid=fseprd993646>)

Attn: Amanda Millburn-Lolo Plan Revision

Lolo National Forest All Units

24 Fort Missoula Rd., Missoula, MT, 59804

From: Willy Peck

P.O. Box 836

Superior, Montana 59872

willy.peck75@gmail.com

Dear Amanda,

The Board of Mineral County Commissioners (Board) in conjunction with the towns of Superior and Alberton, has adopted a Growth Policy to help guide the coordination efforts with other government agencies. Compatible policies, coordinated services, and regular communication between the Board and other governments are necessary for effective governance to address issues of mutual interest, and to provide efficient use of taxpayer dollars. The Board is charged with governing Mineral County in the best interests of all its citizens and are well aware of the effects management decision on these agency owned and managed lands have on the economic stability of our rural communities. The Board has established an advisory group to assist in formulating county policy with respect to public land and resource use issues. The Group is known as the Mineral County Resource Advisory Group (MCRAG).

- For more information on the County's relationship to the federal government, please refer to

Appendices A, C, and E of the Mineral County Resource Use Plan.

- For more information on the MCRAG, please refer to Appendices F, H, and K of the Resource Use

Plan. Note: The newly appointed members of the MCRAG are: Ken Verley, Dave Brink, Angelo

Verley, and Willy Peck.

Mineral County residents enjoy a healthy Montana lifestyle based around the beauty, use and enjoyment of our rugged mountains, forests, rivers, and lakes. Over 90 percent of Mineral County is publicly owned by the U.S. Forest Service and the State of Montana. We take pride in the quality of and access to the natural resources and amenities provided by these public lands that surround Mineral County. We are committed to sustainable resource use and management of these natural resources which forms the foundation of our livelihoods, recreation, custom, and culture.

With the Lolo National Forest (Lolo) covering the majority of Mineral County, actions and decisions on federal land directly impact local residents and communities. Mineral County has adopted a Resource Use Plan, which is official public policy, that addresses the county's expectations with regard to the management of public lands in Mineral County. To increase coordination and cooperation with the Lolo, Mineral County has entered into a Memorandum Of Understanding (MOU) with the Lolo for Cooperating Agency Status and has hired a Natural Resource Advisor to represent the county on all management issues related to the Lolo Forest Plan Revision. As a cooperating agency, Mineral County is provided the opportunity to participate in the NEPA process which includes the preparation of EAs or EISs. The Council on Environmental Quality's regulations implementing NEPA define a cooperating agency as any

agency that has jurisdiction by law or special expertise for proposals covered by NEPA. Cooperating agency status will be especially helpful for Mineral County and the Lolo to work together in the best interest of Mineral County and our communities as well as other counties and communities affected by management decisions and strategies on the Lolo.

Mineral County Recognizes the harvest of sustainable yields of the federally manage forest lands have perceptibly declined on the Lolo since the 1986 Forest Plan was adopted. The Lolo has the capability of increased forest product yields when factoring the sustainable yield potential. Mineral County seeks tangible solutions to maximize the use of forest products in relation to sustainable yields and to insure that critical access to forested areas via National Forest System (NFS) roads and other roads currently classified as undetermined, is not further eroded but enhanced by best management strategies.

All of the Mineral County Communities are located in or near the Wildland Urban Interface (WUI) so fire hazards pose a significant threat to life and property. (Please see figure 34 on page 45 of the Mineral County. *Alberton, and Superior Growth Policy Update, 2016*) Fuels reduction is an important component of fire management. Mineral County intends to pursue fuels reduction efforts in concert with local, state, and federal agencies and private landowners in order to minimize threats to health, safety, and property both inside and outside the WUI.

While we believe the Assessment has done a good job of evaluating many of the most important relevant existing conditions, status, and trends on the Lolo, other important, relevant information was missed. The Board and the MCRAG offer a few general comments followed by more specific comments on the Draft Assessment and Potential Species of Conservation Concern (PSCC). If we have not provided comments on a specific topic, it is because we believe the information provides sufficient information about relevant existing conditions or it is outside of our area of local knowledge and or expertise, or we simply ran out of time for a complete review.

GENERAL COMMENTS

1.) As we have stated previously, our primary focus is on community economics, social health, and public safety within our rural counties. The communities within Mineral County are highly dependent on the resources provided by the Lolo and other forests that surround and border our county. Our Resource use plan states that, Forest management shall utilize the Multiple-Use/Sustained Yield Act of 1960. The Mineral County portion of the Lolo National Forest shall be managed and administered for outdoor recreation, livestock grazing, timber harvesting, watershed protection, public Access and wildlife in the best interests of the American people and primarily the people of Mineral County. These resources shall be managed for sustained multiple use in perpetuity so that future generations would have the opportunity to benefit from, use and enjoy them. The resource management depicted here shall prohibit permanent road or area closures.

Maintaining an open well maintained road system is essential for accomplishing all aspects of forest management and providing for public and firefighter safety on all lands other than those identified as wilderness or recommended for wilderness with a special emphasis on the Wildland Urban Interface (WUI). Note: 1) Additional detailed information on Mineral County's forest management policies can be found beginning on page 20 of our resource use plan.

2.) Nearly all of the rural communities across western Montana and certainly all of them within the Lolo planning area, have a strong culture and historical connection with logging and mining activities. Everything that happens on the Lolo affects the culture of these historic rural communities. These communities and their dependency on our forest resources have played a significant role in the historic development of the forest ecosystems we enjoy today. The Assessment does a good job of including other cultural heritages but falls short with the important cultural and historic role our rural communities have played. Please include the cultural and historic roles our rural communities have played in creating current conditions, status, and trends.

3.) Of the fifteen key topics included in the Assessment, only one (wilderness and wild and scenic rivers) received special emphasis and provided the opportunity for public involvement through a public comment period prior to the development of the Draft Assessment. It is our understanding that this process was mandated through the Forest Service Hand Book or the 2012 Planning Rule or both. These types of processes with emphasis given to a single issue or topic to elevate them above other forest uses is what creates the trust and fear issues that the Forest and the planning team have spent so much time trying to dispel. The planning process simply does not allow time to treat every issue or topic with this level of involvement nor should it. However, it is simply not appropriate to give the impression that the Forest is elevating the importance of a single topic above all others, especially when it is one that is concentrated on a single interests with no provision for multiple use.

4.) Logging and the forest products industry has historically played a significant role in forest management since the early 1800's. Most of the infrastructure we all use and enjoy on our forests today has been created and maintained as a result of logging activity and dollars received through timber receipts. These historic logging activities that continue today are evident throughout the forest and are documented in many historical books. Yet it seems there is a reluctance to include this history and culture in discussions throughout the Assessment when we discuss drivers and distinctive roles that have contributed to today's ecosystems.

While these forest products businesses have distinctive roles within only four of the eight geographic areas, they provide critical infrastructure for managing all the forests across western Montana and eastern Idaho. We speak in more detail about this in the specific sections in our following Assessment comments. Many of these forest products industries provide essential outlets for non-saw and residual products produced through the logging and lumber manufacturing processes which is critical to the success of the forest products industry and essential for our federal and state land management agencies to accomplish mandated management strategies to improve forest health and address the forest health and wildfire crisis we face today.

DRAFT ASSESSMENT COMMENTS

Chapter 1: Overview and Assessment Background

1.1 Document Structure

- The stated intent of the draft assessment is to provide information on the current conditions and resources on the forest and to that end, with a few exceptions we believe it has done that on most of the key issues and topics. However, as indicated below, the language in some case is

misleading and again places the burden on commenters to decide what detail we should be seeking out for comment.

- Page 1 paragraph 1; ***This draft assessment is a rapid evaluation of relevant existing conditions, status, and trends on the Lolo National Forest and represents the first stage in the plan revision process.***

1.2 Purpose of the Assessment

- Describes the three phases of the assessment process with the first phase briefly described as follows; ***Assessment Phase. The evaluation of existing information, such as relevant ecological, economic, and social conditions, trends, and sustainability, and its relationship to the land management plan within the context of the broader landscape.***
- This section goes on to say; ***Assessments are not decision-making documents but provide current information on select topics relevant to the plan area.***

1.3.2 Scope, Scale, and Timing

- States; ***The assessment provides the foundation for the plan revision process. As such, it has been prepared prior to the identification of the need for change to ensure the relevant information is gathered that will inform the plan development process.*** It goes on to say, ***In addition, the assessment includes information related to likely future trends.***

Sections 1.1 and 1.2 provide a summary of the intent of the Assessment, to evaluate and identify current conditions, which if left at that makes commenting relatively easy. It goes on to say that Assessments provide current information but are not decision-making documents. However, section 1.3.2 clouds the issue. While the assessment may not be a decision-making document, it states that it does provide the foundation for the plan revision process and the plan development process, which puts a lot of responsibility on the information included in the Assessment. Additionally, it states the assessment includes information related to likely future trends which is certainly contrary to section 1.1 shown above. We respectfully request that you provide clarifying information about what the actual roll of the Assessment is.

3.) 1.5.1 Biophysical Elements

- **Terrestrial Ecosystems:**
In the early days up until 1920, wildfire, insects, and disease did play the primary role in the development of our ecosystems. However, from 1920 up until 1990, due to fire suppression efforts and some milder climates, fire had a much smaller footprint on the land and for 70 years logging and other prescribed vegetation management strategies became the major system drivers. In the years following 1990, the number of acres treated though mechanical means dropped dramatically and fire once again began to play a larger role. Today, due to the lack of active forest management and the effects of climate change, we are dealing with a forest heath and wildfire crisis, and wildfires are certainly playing a larger role in altering our ecosystems. For the past 100 years logging and other prescribed vegetation management strategies has played a larger role as major system drivers with ability to determine desired outcomes without the catastrophic results created by wildfires that can destroy entire ecosystems including sensitive and endangered plant and animal habitat. If we are going to talk about system drivers and

disturbances in this section that played a role in the development of today's ecosystems, we respectfully request that you acknowledge the current and historical contributions made by logging and other active vegetation management strategies as well as the cultural and historic affects created as our rural communities have developed into ecosystem drivers.

Native Species Diversity:

Because the Lolo has a long history of mining and logging there are very few large areas of habitat on the Lolo that are undisturbed by humans, including those lands found in inventoried roadless areas. Because our forests are a renewable resource many of the disturbances cannot be seen from a distance but once you get on the ground, they are there. Wide-ranging carnivores such as grizzly bears have much larger problems to navigate between ecosystems (which they are doing on a much more regular basis) than the forest roads that provide access for multiple use on our National Forests. Northern Continental Divide Grizzlies for example, in addition to the hustle and bustle of activities in Glacier National park and the going to the sun road, must navigate several state highways and associated residential areas and towns. Residential development in the Missoula and Nine Mile Valleys pose additional challenges and the I-90 corridor all must be crossed before they ever get to a large portion of the Lolo much less the Bitterroot Ecosystem. We expect that once they have navigated these far greater obstacles, they will not be further deterred by our National Forest road system. If we are going to talk about the need for large areas of land undisturbed by humans, we should also include a discussion about the positive affects human disturbance has on many wildlife species. For example, many clearcuts that were created in the 60s, today are considered exceptional habitat for Lynx and are off limits to further vegetation management. We do not believe this paragraph depicts actual current conditions relative to Native Species Diversity.

4.) 1.5.2 Social Elements and Multiple Uses

- Cultural and Historic Resources and Tribal Areas of Importance:
The first known sawmill was built in the Bitterroot Valley in 1845. While we are not certain when the first settlers arrived, it certainly must have been in or before the 1840s rather than the 1850s.
- Wildland Urban Interface:
Currently, many Counties have implemented fuels reduction projects utilizing funds provided from County, State, and Federal programs to reduce the risk and intensity of fires within the WUI and ignition zones in residential areas. Adding this information provides a more accurate picture of current relevant conditions, status, and trends.
- Forest Goods and Services:
While Missoula County has, as indicated, diversified into a regional center for health care, recreation, and education, it continues to have a strong presence with the forest products industry that was not included. Pyramid Mountain Lumber in Seelye Lake, Roseburg Forest Products in Missoula, and Willis Enterprises in Bonner, along with several other smaller forestry related businesses provide hundreds of high paying industry jobs and provide opportunities for development of other related forest products businesses. They provide the critical infrastructure essential for managing our federal and state forest lands. Adding this information will provide a better understanding and is more inclusive of today's relevant conditions, status, and trends.

5.) 1.5.3 Distinctive Roles by Geographic Area

- Clearwater:
Pyramid Mountain Lumber located in Seeley Lake is the oldest surviving family-owned mill in Montana. They have been the primary source of year-round employment since 1949, far before today's booming recreational business was started. In fact, Pyramid Mountain Lumber has been instrumental in the development of recreational business in the area, yet nothing is mentioned in this section about their existence and the distinctive roles they play. We hope you will correct this oversight.
- Greater Missoula:
Two forest products businesses exist in the Greater Missoula area that provide essential services for managing our federal and state lands, Roseburg Forest Products and Willis Enterprises. They provide hundreds of critically important high paying industry job opportunities and should be included in the distinctive roles for this area.
- Lower Clark Fork:
Thompson River Lumber is located at the mouth of the Thompson River. Thompson River Lumber and their associated contract loggers, road builders, and trucking businesses provide the critical infrastructure needed for the Forest Service to accomplish program targets to improve forest health, reduce the risk of wildfires, improve the forests resistance and resilience to wildfires, improve wildlife habitat, and improve public and firefighter safety. As the largest employer in Sanders County they provide critical high paying job opportunities for year-round employment. Please include this information in the distinctive roles for this geographic area.
- St. Regis:
We appreciate the mention of the forest product economies in this area but more specific information should be included. The distinctive roles for this area indicates that the economy is based on a blend of forest products and tourism. It goes on to elaborate on a few specifics with recreation but mentions nothing more about the forest products businesses. We have three forest products businesses in Mineral County that provide critically important year-round job opportunities in Mineral County, Idaho Forest Group, Big Sky Forest Products, and Mountain West Bark. Big Sky Forest Products and Mountain West Bark provide an outlet for non-saw and other residual products that are critical for the success of lumber manufacturing facilities and federal and state vegetation management programs. While summer recreation continues to grow, road and area closures have dramatically reduced winter recreation. Please include this information in the final version of the assessment.

6.) 1.6 Major Drivers and Stressors

- Litigation has become a major factor in delaying or stopping projects that would otherwise support ecosystem integrity. Human activities such as fire suppression, livestock grazing, vegetation management, and population growth, are listed as major drivers or stressors. Similarly, litigation should be listed along with these other human caused stressors and driver.

7.) 1.8.3 States, Local Governments, and other Federal Agencies

- County Resource Use Plans should be added to the list of management plans.

Chapter 2: Assessment Findings: Biophysical Elements

1.) 2.1.1 Climate Change

- As the assessment suggests, there is a great deal of uncertainty about the magnitude and rate of climate change and how precipitation patterns will change. However, increased temperatures are expected to result in a reduction of water available for forest vegetation and severe wildfires will occur more frequently, at higher intensity, and on a larger scale. Additionally, wildfires are accelerating transitions to non-forest ecosystems types as a result of conifer tree recruitment failure due to environmental constraints on seedling survival. These same conditions will continue to create more favorable conditions for invasive species, insects, and disease which will degrade forest and vegetation health.

While the actual effects of these conditions is unknown with any certainty into the future, the effects of these trends on forest vegetation are visible today. As identified in the Presidents Wildfire Crisis Strategy, we are in a forest health and wildfire crisis and we must dramatically accelerate the number of acres of hazardous fuel treatments we are implementing annually if we are going to get ahead of these catastrophic conditions. We understand the primary intent of the assessment is to evaluate existing information, such as relevant ecological, economic, and social conditions, trends, and sustainability. However, the assessment also includes information on likely future trends. This climate change section should acknowledge the need to increase the number of acres being treated annually with hazardous fuels treatments to help reverse current trends.

2.) 2.1.2 Fire

- The first two sentences of this section state; *"The Northern Rocky Mountain ecosystems are often referred to as fire-driven systems. This acknowledges fire as the major disturbance that shapes the forests and shrublands of this area."* While it is true, fire up until 1920 was the major disturbance that shaped vegetation ecosystems, it is also true that during the 70-year period between 1920 and 1990, fire suppression, logging and other vegetation management practices played a much larger role than fire in shaping our forest ecosystems. As the graph in figure 3 of the assessment illustrates, we successfully managed our forests and suppressed wildfires, primarily through mechanical means up until 1990. In 1991 harvest volumes and consequently acres treated, in western Montana began a sharp decline. The Lolo for example, in the single year between 1990 when they harvested over 103 million board feet and 1991, harvest levels dropped by nearly 50 percent a trend that continued until it hit an all-time low of less than 11 million board feet in 2007. Similarly harvest volumes on other forests across western Montana saw significant reductions as well. The Kootenai dropped from a high of 248 million board feet to a low in 2009 of 26 million board feet, the Bitterroot dropped from 47 million board feet to 3.5 million board feet in 2000, the Deer Lodge dropped from 45 million board feet to 6 million board feet in 2007, and the Beaverhead dropped from 42 million board feet to 5.5 million board feet in 1996. Over the next 20 to 25 years we continued to suppress wildfires and restrict vegetation management, allowing hazardous fuels to build up, a process that continues today, creating the forest health and wildfire crisis we deal with today. If the assessment is truly focused on assessing current conditions and discussing historic functions that shaped our forest ecosystems,

at the very least a condensed version of the information we provide in this paragraph must be included in the assessment.

3.) Fire in Riparian Areas

- While we certainly are not familiar with all the science associated with the effects of fire in riparian areas, we do have substantial knowledge about historic and current fire trends on the Lolo, especially within Mineral County.

Historically (Pre 1990), the Lolo had an intact well maintained road system that provided access for the multiple use of our forest resources. During this time frame the Lolo was actively managed to support local community economics, provide sawlogs for local forest products industries, improve forest health, improve wildlife and fishery habitat, and improve public and firefighter safety. Reduced stand density made more water available to remaining trees and vegetation and allowed more water to reach streams and other riparian areas. While natural fire was still a regular occurrence on the forest, fire intensity and severity was reduced and in many cases streams and other riparian areas remained unaffected. Streams and riparian areas did contribute to limiting the extent and severity of wildfires by altering burn patterns, providing unburned refugia, and filtering ash and silt from post fire debris flow. Today wildfires burn at much higher intensity and severity burning at catastrophic proportions across large landscapes including streams and other riparian areas. Streams no longer provide a natural filtering system and silt and post fire sediment is allowed to flow freely into the stream channel. These are the actual current conditions that exist on the Lolo that should be included in this assessment.

4.) 2.1.5 Flooding, Stream Flows, and Groundwater

- Groundwater

The second to the last paragraph of this section states, "A long-held assumption is that there is an adverse relationship between forest cover and water yield. However, more recent reviews of research indicates that post disturbance (i.e. timber harvest or forest fires) that decrease forest cover may increase, decrease, or cause no significant change to water yield in a watershed". The last paragraph goes on to say, "At times of municipal water scarcity, the topic of increasing stream flows for water yield through additional forest harvest has gained political and media attention."

First: When we attempt to discuss the effects of timber harvest at a watershed level, increases or decreases of water yield will be almost unnoticeable and unmeasurable simply because timber harvest at the watershed level will generally treat less than 15 percent of the acres within the watershed and more often less than 5 percent. Timber harvest will not significantly affect Water yield at the watershed level without substantially increasing the number of acres treated. However, drainages within the watershed that contain water will always show an increase in water yield following timber harvest. Obviously, dry drainages within the watershed will not show changes except during high water events.

Second: Every large fire we have had in recent years on the Superior and Plains/Thompson Falls Ranger Districts that burned at the watershed level, created substantial increases in water yield.

Third: For assessment and planning purposes, we should follow available science, first-hand knowledge, and local expertise to define existing conditions, status, and trends. Comments that suggest current conditions, status, and trends are based on “assumptions” or are politically motivated through “political and media attention” contribute nothing to the intent of the assessment.

5.) 2.1.6 Invasive Species

- **Aquatic Invasive Vertebrates**

Invasive species that threaten native species include brook trout, brown trout, rainbow trout, and northern Pike. Northern Pike were likely introduced illegally by the public in the 1990’s whereas brown trout, rainbow trout, and brook trout were introduced by agencies (likely, Fish Wildlife and Parks) in the early 1900s to provide increased recreational opportunities. This practice was discontinued in the 1970’s when it was recognized it was harmful to the native fish communities (primarily bull trout). Brook trout, rainbow trout and brown trout now greatly outnumber native trout species.

These non-native trout species and climate change now pose the most severe threats to native trout species. With the listing of bull trout as threatened under the endangered species in 1998, and the designation of bull trout critical habitat in 2010, the primary burden of managing the bull trout habitat fell sharply in the lap of the Forest Service in spite of the fact that State agencies are in a large part responsible for the species decline. Non-native species will continue to prey on young bull trout and out-compete adult bull trout for space and resources. Authority to directly manage native and non-native fishes belongs to State agencies and they should take an active role in developing solutions to recover bull trout populations rather than sit back and hope Forest Service habitat restoration efforts will fix the problem they created. It seems it could be as simple to increase bull trout populations as it was to establish the invasive species by planting hatchery stock by the thousands if necessary. The Thompson Falls fish ladder only passed 21 bull trout from 2011 to 2022. It is unclear whether this is a design flaw in the ladder or simply an overall lack of migratory bull trout. Planting large numbers of bull trout could answer this question as well. There needs to be a collaborative agreement between FWP and the Forest included in the Lolo Plan Revision to guide a recovery effort.

6.) 2.1.8 Livestock Grazing

- This section improperly categorizes livestock grazing only as an ecosystem stressor when in fact, if managed properly in can also be an ecosystem driver. Additionally, this section contains very little information about current conditions, status, and trends. Instead it talks mostly about what can or may happen when grazing allotments are improperly managed. While we are not familiar with conditions on all grazing allotments, we are familiar with two on the Superior District. In our opinion these allotments are properly monitored and managed. These properly managed grazing allotments have become ecosystem drivers by reducing grass and other understory vegetation which reduces the risk of severe wildfire and reduces fire intensity if and when they occur. They are managed for sustainable grazing opportunities into the future. While there is some degradation of the stream channel, the fire hazard reduction benefits far away any

negatives impacts. Additional grazing opportunities should be considered on the forest to help with fuel reduction efforts.

7.) 2.1.9 Forest Vegetation

- This section does a good job of discussing vegetation management tools and techniques and past vegetation treatments by activity and type, but it misses completely the assessment of current conditions, status and trends. The forest currently has numerous active forest restoration/fuels reduction projects in progress (17 just on the Superior and Plains/Thompson Falls districts) designed to improve forest health, reduce the risk of wildfire, and make forest more resistant and resilient to the effects of wildfire. Due to the lack of active management and warming climate conditions, the forest is experiencing high levels of mortality due to insects and disease. Due to overstocked stand conditions trees are forced to compete for a limited supply of water adding to forest health and mortality issues. Unless we are missing the intent of the Assessment completely, at a minimum a condensed version of this information should be included here.

2.10 Carbon Stocks and Carbon Pools

- **Carbon Sequestration:**
Wildfires are one of the biggest contributors to carbon emissions. One example is the Angora Fire in South Lake Tahoe. This fire burned 3,100 acres of forested land and released 141,000 tons of carbon dioxide and the decay of the trees killed increased the emissions to 518,000 tons. This is comparable to 105,500 cars annual emissions (Bonnicksen 2008). The ten-year mean number of acres burned annually across the United States is approaching 7 million (NIFC 2019); the cumulative emissions from these fires is large, and altering the intensity of these fires represents an opportunity to significantly reduce emissions. **Through forest plan revision the leadership team should be looking at what needs to be done to reduce wildfires on the landscape.** Science has proven that sustainably well managed forests sequester more carbon and are carbon sinks. Unhealthy unmanaged forests are carbon sources due to tree mortality from wildfire, insects, and diseases. Trees harvested through sustainably managed silvicultural prescriptions are manufactured into lumber and paper products which can store carbon for decades and even centuries. **The forest plan leadership team should be looking at ways to increase the acres treated through sustainable forest management and not spend time identifying areas to potentially move out of the suitable base into other management classifications (MA's).** These other MA's generally are restrictive and hinder the local land managers from being able to carry out good sound silviculture.

2,1,11 Infrastructure

- We believe it is inappropriate to discuss the role of infrastructure as a stressor without also discussing the benefits of roads. While section 3.8 Infrastructure, discusses the importance of roads for many of the resource use and management activities, neither of these sections discuss the adverse effects to water quality and watershed health resulting from high-severity wildfire and the positive correlation between an intact road infrastructure and effective wildfire suppression. This section also *states that the Lolo contains "many" miles of roads within 100 feet of waterbodies where roads can impair the natural function of riparian and aquatic*

ecosystems. While there are roads on the Lolo that are within 100 feet of waterbodies, quantifying that using an arbitrary measurement like “many” is misleading. If we are going to include a measured amount it should be backed with actual measured miles or we should not discuss the quantities.

Chapter 3 Assessment Findings: Socioeconomic Elements and Multiple uses

1.)3.1 Social and Economic Conditions

- This chapter provides a huge amount of invaluable information that is certainly relevant and important to this plan revision process. The Lolo is located within seven counties in Montana, borders four counties in Idaho, shares its boundaries with seven other National Forests (more than any other forest in the U.S.), and borders the Flathead Indian Reservation on three sides. Given its Juxtaposition with these other agencies and counties, we understand and support the inclusion of 31 counties in the socioeconomic area of influence. This acknowledges the breadth of influence the Lolo has on socioeconomic conditions across a wide range of counties and communities.

However, we believe additional information needs to be included to fully understand existing relevant conditions, status, and trends. While we have lost our large lumber manufacturing facility in St. Regis, we continue to have an active forest products industry based in Mineral County that currently provides around 130 high paying forestry related jobs. The Lolo’s central location is drawing active involvement from nearly every remaining sawmill in western Montana and north easter Idaho seeking timber and other commercial forest products. As evidenced by the aggressive current bidding practices, there is a growing demand for commercial forest products off the Lolo. Additionally, Mineral County is seeking other opportunities to bring new forest products businesses into the county. This continued business associated with the forest products industry continues to contribute to the essential economic conditions in Mineral County and highlights the need for us to look for ways to increase the suitable base for timber management. Additionally, I-90 runs through the center of Mineral County and the Lolo from Lookout pass almost to Drummond. Most of the Lolo is located less than 20 miles from the freeway providing great access for transportation of commercial products and access for the ever-growing essential recreation industry.

- Much of the socioeconomic section in the Assessment was informed by the Economic Profile System maintained by Headwaters Economics. This toolkit was developed in partnership with the Bureau of Land Management and the U.S. Forest Service. We are concerned that the Headwaters information provides an incomplete cross-section of the forest products industry. For example, many smaller contractors and operators that work in the Forest and in secondary manufacturing but do not report or file unemployment insurance reports to the State and Counties are not represented in the Headwaters resources. In this respect we believe that the existing assessment of jobs generated from timber harvest on the Lolo National Forest is flawed. We recommend that the planning team focus its analysis on publications by the University of Montana Bureau of Business and Economic Research (BBER) to improve the portrayal of the economic impacts of timber harvest on the Lolo.

3.3 Fire Management and the Wildland Urban Interface

- This section does a good job of presenting current methods and strategies for assessing and managing fire on the Lolo. It provides relevant information with fire history and its contribution to ecological function. However, we believe more detail is needed to accurately portray relevant existing conditions, status, and trends.

Of the 640,923 acres that burned between 1985 and 2020, approximately 560,000 of those acres burned between 2000 and 2020 leaving only 81,000 acres burned in the previous 15 year period. In order to accurately represent current conditions, status, and trends, this should be shown in two separate time periods, 1985 to 1999 and 2000 to 2020. This would do a better job of illustrating the change in current conditions and trends.

This section also states that over 300,000 acres of hazardous fuel treatments have been accomplished in the plan area and much of it using prescribed fire and much of that focused on wildland urban interface areas of the Forest. This statement needs more detail to accurately assess current conditions, status, and trends. It should detail how much of the work utilized prescribed fire and how much of that was done in conjunction with timber harvest and other treatments. It should detail what the other types of fuels treatments were and how much was actually in the Wildland Urban Interface (WUI) areas of the Forest?

We cannot accurately discuss fuels reduction, wildfire mitigation, or wildfire management issues both inside and outside the WUI, without including the essential role of commercial and noncommercial mechanical treatments. Because of the risks associated with prescribed fire, fire should only be utilized in the WUI in conjunction with mechanical treatments to reduce hazardous fuels and fire intensity before fire is put on the landscape. With the forest health and wildfire crisis we face today and over 1.3 million acres of the Lolo identified as WUI, it is essential that we actively address the overstocked stand conditions and hazardous fuels issue across the entire forest with an emphasis on the WUI.

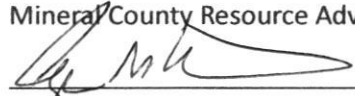
Full suppression of fires is not a management choice. Every fire potentially poses risk to human values, health, life, and property. The Mineral County Resource Use Plan states that; "Every citizen of Mineral County is surrounded by forest and thus lives within harm's way of a nearby wildfire." and "Therefore the Board commit to the policy that every fire on public land as well as private property will be fought and extinguished as quickly as possible." Every fire poses an unacceptable risk to human health and values. As the risk of wildfire increases. Proscribed burning is becoming unacceptably risky and less acceptable to the public.

In conclusion, we appreciate the hard work the planning team put into the preparation of the Draft Assessment. Our comments are not intended to take away from this hard work but hopefully to provide additional detail and share our local knowledge and expertise with current conditions, status, and trends. Thank you for the opportunity to comment and we look forward to the opportunity to work with the Planning Team and the Forest in the future to ensure our forests are managed for the health, safety and economic stability of our rural counties and communities.

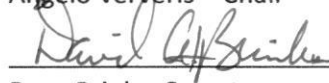
Respectfully submitted,

Mineral County Commissioners

Mineral County Resource Advisory Group



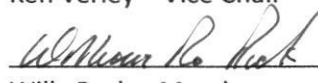
Angelo Ververis – Chair



Dave Brink – Secretary



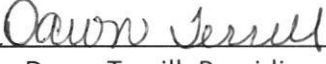
Ken Verley – Vice Chair



Willy Peck – Member

Sincerely,

Mineral County Commissioners

By: 
Dawn Terrill, Presiding Officer

By: 
Roman Zylawy, Commissioner

By: 
Duane Simons, Commissioner