



## Eastern Sanders County Collaborative

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Dear Carolyn Upton,

The Eastern Sanders County Collaborative (ESCC) is writing to provide our comments on the Lolo Forest Plan Proposed Action. The Eastern Sanders County Collaborative (ESCC) is a diverse group of citizens from broad backgrounds working on natural resource projects with our local partners within the boundaries of the Plains/Thompson Falls Ranger District of the Lolo National Forest. Our membership has a wide interest base, with folks in industry, motorized recreation users, backpackers, hunters, and fishermen and women. All our members are directly impacted by the decisions being made through this plan revision, and many of our members depend upon the Lolo in some way for their livelihoods, whether through the tourism and recreation dollars that energize our small businesses in the area or through the timber industry and the many jobs dependent on a sustainable flow of timber coming from the Lolo. Speaking as Co-Chairs, we are disappointed with the general lack of presence from the planning team in Thompson Falls, the largest town in Sanders County, a county that consistently ranks as one of the more impoverished counties in Montana and who's citizens are reliant on the how this Forest Plan Revision will affect the eastern portion of the 921,489 acres of National Forest Land located within the county's borders. We believe our community needs a presence from the planning team to answer questions and facilitate conversation regarding this revision, and recently our collaborative has tried to fill that need to the best of our ability. That being said, we have broken down the Eastern Sanders County Collaborative's comments on different aspects of this project below based on our last meeting.

### **Wild and Scenic Rivers**

Currently, there are two segments of river identified as eligible in our county, the West Fork Thompson River (eligible) and the Paradise to Tamarack stretch of the Clark Fork (eligible and suitable). On the West Fork eligibility, we recognize there is a suitable habitat for a species of concern, Brittons Dry Rock Moss, and that this stretch of river has the most observations

within the state. Though we understand the importance of conserving such an area, some members did have concerns over how the ¼ mile buffer on either side of the stream could hamstring the district's ability to adapt to an ever-changing landscape in the future. Though the interim protections on a scenic river do allow for timber harvest should it enhance the river's environment, we wonder how feasible that would be in practice, and if this designation may dissuade the district from pursuing limited timber harvest or additional campsites within a ¼ mile of river in the future. Additionally, our membership had questions over whether the recent fire that burned through the area had any impact on the presence of Brittons Dry Rock Moss in the river; however, we did not have any Forest Service members at our meeting to help answer that question.

As for the Clark Fork designation, few had any objections over whether the river had significant recreational value. Again, there was concern about the feasibility of managing future mortality and decay in timber stands within the ¼ mile buffer on either side of the river. Though we know this recreational buffer won't impact the private landholdings located near the river, it will technically include those parcels, which could lead to incompatibilities and displeasure from those landowners down the road should fire or significant mortality occur in the federal ground abutting the private.

### **Recommended Wilderness and Recreation**

The Proposed Action currently has no new wilderness proposals in our county, and the general management areas in our county are broken down as 42% backcountry and 58% general forest. Some members in our group are a part of the local Cube Iron Cataract Coalition, a group advocating for the Cube Iron-Silcox and Cataract IRA's to become proposed Wilderness. As it stands, those IRA's are denoted as backcountry, which does afford the area with another lay of protection, beyond an IRA but short of proposed Wilderness. Though we have members that are disappointed with this, a majority of our members felt backcountry to be a fair designation.

Though there has been acknowledgement that the maps and numbers on summer and winter recreational opportunities in the Lower Clark Fork Geographic Area were incorrect and will be redone, we think it pertinent to nonetheless comment on recreation in our area. Specifically, what concerned our members with the current map is the large disparity between the summer and winter motorized recreational opportunities. With the current erroneous map, winter motorized recreational opportunities can occur on only 20% of the lands in the Lower Clark Fork Geographic Area, as opposed to 46% in the summer. Our motorized users felt that the summer acreage was too low let alone the winter acreage. As you work to recalculate these figures, we would urge a harder look at the winter recreation opportunities for the motorized community. Additionally, we worry that the new listing of Wolverine as Threatened may impact winter snowmobile access as well.

### **Timber**

In terms of suitability, there were no acres identified in the Lower Clark Fork Geographic Area that fully excluded harvest and many of our members felt like that would give the district more flexibility in determining treatment feasibility as needed. Though the suitable base is only 199,955 acres (41% of the area) which is disappointing, the unsuitable base would at least allow

for timber harvest to take place with good reason. Again, 40% of the Geographic Area is in an Inventoried Roadless Area, where harvest could potentially occur, and most of the unsuitable overlaps with IRA's or stream courses.

On the forest as a whole, our industry members had concern over the Sustained Yield Limit and the Projected Timber Sale Quantity. With a sustained yield limit of 270,000 CCF (roughly 148 MMBF), we felt that the projected timber sale quantity of 80,000 CCF (44 MMBF) was very low. The forest in total has 851,201 acres identified as suitable base, with an additional 1,033,730 acres where harvest could potentially occur. If a rough, conservative estimate of 10 MBF/acre is used as an average volume removed per acre in a cutting unit (this number could potentially be higher, obviously depending on stand types and treatment types), the 44 MMBF target would result in approximately 4,400 acres treated per year. For just the suitable base, it would take 193 years to log every acre of the 851,201 acres identified. Our members wondered if the Forest Service took into account the Montana Forest Action Plan, Wildfire Crisis Strategy, and the Priority Landscapes and Emergency Action Determination (EAD) when developing the projected timber sale quantity number, as well as the budding capabilities of GNA to assist in timber sale rollout and administration. We don't believe this pace is sufficient enough to even keep up with treating the needed acres in the high-risk Wildland Urban Interface, let alone on the forest as a whole. As it stands, there are approximately 1.3 million acres identified as WUI on the forest, with a large portion of that (52%) located in either Sanders or Mineral County. To treat these WUI acres in order to protect property and life in our rural community, the Lolo will need to produce more than 44 MMBF a year in timber sales.

Thank you for taking the time to read this letter over. We look forward to engaging more in the process in the future.

Sincerely,

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Zach Whipple-Kilmer  
Co-Chair



Cody Daiutolo  
Co-Chair