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Organization: Mineral County Resource Coalition

Title:

Comments: September 11, 2019

West Fork Ranger District

Attn: Piquett Creek Project

673 5 West Fork Road

Darby, Montana 59829

David Fox, Project Leader,

These comments are being offered on behalf of the Mineral County Resource Coalition (MCRC). The MCRC is a diverse group of citizens that work together to help State and Federal Land Management Agencies deal with the complex issues associated with management of our forest lands. With a focus on Mineral County and its communities and citizens, we work across Forest, County, and State boundaries to help develop forest restoration projects that are designed to improve economic conditions in all our rural forested counties. In addition to our strong focus on economics, we strive to help develop restoration projects designed to, improve forest health, reduce the risk of uncharacteristic wildfires, provide for firefighter and public safety, improve forest infrastructure, develop recreation, and contribute to the local, regional, and national timber needs.

Economics:

92% of Mineral county is owned by State and Federal Land Management Agencies, leaving only 8% in our taxable land base and leaving Mineral County highly depend on the resources provided by our National Forests for our economic stability. Our local sawmill in St. Regis is the largest employer in

Mineral County with nearly 100 direct employees. Additionally, we have another 150 people employed with contract loggers and road builders, some of which live and do business in the Bitterroot Valley. Maintaining our sawmill is absolutely vital to the economic future of Mineral County, it's communities, and its citizens as well as surrounding communities.

In order to accomplish the goal and needs set forth in the Purpose and Need for this project, we have to generate revenue through the sale of commercial products, primarily timber receipts. Treating the maximum number of acres commercially within the 3000-acre project will improve project economics and provide more opportunities to do more restoration work on the ground. The proposed treatments for this project can only be accomplished through the use of our local timber industry, both to provide the equipment and expertise to complete the work and to provide the revenue through timber receipts to pay for the work.

#### Purpose and Need:

This is a pretty focused project with only one goal identified in the purpose and need. To accomplish this goal, four underlying needs have been identified that will be addressed to accomplish the single goal.

While we support the goal identified in the Purpose and Need, we believe a very important project goal has been overlooked.

As discussed above the MCRC feels a responsibility to help improve the economics of our rural counties and communities and we believe our ational Forests are obligated to share in this responsibility as well.

Current policy and direction from the Chiefs and Regional offices as well as Forest Plan direction, clearly puts an emphasis on including community economics and the need to contribute to the growing demand for timber at the local, regional, and national levels in each vegetation project developed on our National Forests.

With these things in mind, we respectfully request that you add another goal to your Purpose and need for the Piquett Project that emphasizes the need to contribute the economic stability of our rural communities and contribute to the demand for commercial products.

#### Proposed Actions:

The MCRC supports the development of this project under the Wildfire Resilience Categorical Exclusion authorized under Section 605 of HFRA (16 U.S.C. 659ld) and we support the following comments provided by Idaho Forest Group.

Under the Proposed Action heading, there is a list of activities that could be included. With the following exceptions we support the proposed activities.

Haul restrictions to the roads listed. Without additional information it is hard to figure out how the roads listed will be accessed without at least a partial use of road 5723. We only ask that the Forest confirm that the roads listed will provide the access needed to complete desired restoration activities.

The need for restoration in the project area is well documented throughout the scoping document. We don't believe restoration efforts should be based on a predetermined maximum number of 500 truckloads. The area is all in management areas that allow timber harvest, if harvest activity is the tool that is most appropriate to complete the desired management goal, then that is what should be used no matter the number of loads created.

Restrictions that effect when operations can occur are sometimes necessary to protect a specific resource and we support that when it is legitimate. These restrictions can be expensive and limit the amount returned to the government in the form of timber receipts. In some cases, potential bidders can even be priced out of the bidding process. A statement that hauling will only occur on dry roads is far too open ended and leaves way too much to personal interpretations. We

suggest a statement in the contract that says no hauling when it creates irreparable resource damage is far less ambiguous.

It states that all roads that cross streams will be graveled prior to any hauling. We wonder if that means the entire road or just the portion of the road that crosses the stream .

We believe there should be a statement to ensure all roads will be brought up to required BMP specs.

In Closing, the Bitterroot ational Forest and the Piquett Creek project lie within the historic working circles of three large sawmills including our local mill in St. Regis. The project provides us with a source of commercial products needed to help secure a steady, dependable supply of timber to our local sawmills that will help develop and maintain production at an economically sustainable level.

As stated, we support this project as a 3000-acre CE designed to reduce the risk of uncharacteristic wildfires and establish a more fire resilient forest, by implementing good forest management practices designed to reduce forest densities and ladder fuels, reduce potential for crown fires, increase age class diversity and promote shade intolerant species across the entire 3000 acre project area. We do not believe management decisions should be guided by a predetermined number of truck loads.

Respectfully,

William R. Peck

Co-Chair, Mineral County Resource Coalition