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VIA Email: <https://cara.ecosystem-management.org/Public/CommentInput?Project=55744> October 7, 2019

Bitterroot National Forest Attn: Mud Creek Project 1801 N. First Street Hamilton, MT 59840

Subject: Mud Creek Project

Dear Project Leader:

On behalf of the Mineral County Resource Coalition (MCRC), thank you for the opportunity to comment on this project. The MCRC is a diverse group of citizens that come together on a regular basis to work with State and Government Land Management Agencies to help increase the pace and scale of Forest Restoration projects with an emphasis on utilizing the natural resources provided by these restoration projects to improve the economic stability of our rural counties, communities, and their citizens.

Purpose and Need for Action:

While we support the three focal areas identified in the Purpose and Need for Action, we also believe the Forest has missed a very important aspect of the project that should be added to the Purpose and Need. The economic stability of our rural counties, communities and their citizens are highly dependent on the resources provided by our National Forests. Please add a statement to the Purpose and Need for action emphasizing the projects need to help provide for the economic stability of our rural communities and contribute to the local, regional, and national need to help meet the increasing timber demands.

Roads:

As indicated in the scoping document, the project area has an extensive road system and we support the plan to complete a road analysis that will guide decisions regarding road management. In addition to road density issues, road management decisions will address sediment erosion from road surfaces, culverts undersized or not functioning properly, vegetation condition, and other repairs to reduce impacts to streams. Through the road analysis and decision-making process specific to roads, we ask that you keep the following important factors in mind:

- * Public and firefighter safety. Alternate escape routes in the event of a wildfire.
- * All motorized and nonmotorized recreational uses.
- * Road maintenance and required BMP improvements.
- * New permanent roads and or temporary roads will need to be constructed to provide broader management opportunities within the WUI and across the project area.

* Mechanical ground based and sky line equipment will need to be used for harvesting timber in the project area. These two systems require very different types of road systems.

* There are several main roads that provide access into the project area. Roads #1357, #1303, #5644, #730, #66E, #5715, #5635, 732A and #5637 are all main access routes with many of them forming loops that should be maintained for public and firefighter safety, efficient removal of commercial products, and recreational opportunities.

* We are not familiar with all the roads in the project area; therefore, we will not comment on specific roads to be closed or kept open other than those mention in the preceding paragraph. However, we are familiar enough with the project area to know that many of the roads have closed naturally. If any of these roads are selected for closure, we respectfully request that they be closed through the administrative process, reducing costs and unnecessary ground disturbance.

Vegetation:

* While we commend the Forest for prioritizing forest health and fuels reduction treatments in the WUI, we also believe road and vegetation treatments should be addressed equally throughout the project area. Poor forest heath due to over stocking, insects and disease infestations, and lack of active management have created heavy fuels loading equally across the project area. Road maintenance and BMP issues are also present throughout the project area as well.

* Areas of past timber harvests are evident throughout the project area. Most of the past harvest areas, whether planted or regenerated naturally, have a well-established stand of second growth timber varying in size depending on the length of time since past harvesting occurred. Large areas of untreated stands are present throughout the project area. Many of them are accessed by existing roads while others will need new roads constructed for access but all are in need of management.

Economics:

* Increasing the number of acres being treated within the project area better meets the desired conditions of the Purpose and Need and the overall scope of the project. Project economics are improved by adding additional volume for commercial harvest. Timber receipts will help pay for the cost of work required identified by the Purpose and Need.

In closing, the project area is at high risk of experiencing an uncharacteristic wildfire event. We firmly believe the maximum number of acres should be treated with this entry while still providing for other forest resource needs and uses.

Respectfully,

William R. Peck

Co-Chair, Mineral County Resource Coalition