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Comments: RAVALLI COUNTY COMMISSIONERS

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October 3, 2019

Seth Carbonari

Bitterroot National Forest 1801 N First Street Hamilton, MT 59840

RE: Ravalli County Comments on the Mud Creek Project

Dear Seth,

The Board of Ravalli County Commissioners (BCC) thanks you and Forest Supervisor Matt Anderson for considering the following comments on the Mud Creek Project. We look forward to working with you throughout this project.

Purpose and Need

The Ravalli County Commissioners request that the purpose and need for the project be expanded to include the following purpose and need statement: Provide Timber Product and Related Jobs

The Forest Plan supports this purpose and need with the following Forest-wide Management Goals and Objectives:

Goal: Provide sawtimber and other wood products to help sustain a viable local economy (page 11-3)

Objective: Offer affordable sales (page 11-6)

This purpose and need statement would help the Forest Service meet the requirements under the Organic Administration Act of 1897 that establishes one of the purposes of the National Forests is to furnish a continuous

supply of timber for use and necessities of citizens of the United States. Additionally, the National Forest Management act of 1976 requires consideration be given to the economic stability of communities whose economies are dependent on National Forest materials. This requirement could not be more applicable than it is to our South Bitterroot Valley Community. The necessity for the additional purpose and need statement is further justified in the Bureau of Business and Economic Research (BBER) study from September 2018 "The Impact of Timber Harvest Declines on the Ravalli County Economy" (See Attachment A).

Forest Management

Ravalli County supports active forest management within Ravalli County's jurisdictional boundaries. This management must be based on sound science and consider impacts to the local economy, cultural values and common sense. Forest management practices must include planting, thinning and harvesting of the forest vegetation. Removal of forest materials using mechanical and other harvesting systems will insure continued investment, employment and business opportunities in Ravalli County. We encourage a harvest level that results in a stable and sustainable volume of merchantable and non-merchantable materials being removed each year. The Bitterroot National Forest and the State of Montana Trust Lands have the capability under proactive management to achieve a healthy forest ecosystem while providing clean water, clean air, wildlife habitat, recreational opportunities, economic benefits and stability.

Ravalli County also encourages timber harvest in the Inventoried Roadless Area (IRA). Increased vegetation management in these headwater drainages would be beneficial to the watershed and would reduce the severity of catastrophic wildfires.

Specific Location Treatments with the Project Boundary

Nez Perce Creek Drainage -The Nez Perce drainage, especially the North side has significant fuel and fire potential. The Nez Perce is recreation and travel corridor with homes and private property on the lower end. Harvest and fuels reduction throughout the drainage, including adjacent to the IRA's will reduce fire potential and behavior.

Took and Mud Creek Drainage - Both of these drainages would benefit from commercial harvest and fuels reduction to reduce fire potential. Commercial harvest should be accommodated with minimal road construction.

Ditch Creek South - The Ditch Creek drainage and South and to the project boundary to the East has significant fuels.

Ravalli County Natural Resource Policy

The BCC adopted the Ravalli County Natural Resource Use Policy in 2012 (see Attachment B). The policy outlines goals and objectives in specific Ravalli County Natural Resource areas. (Ravalli County has provided a number of courtesy copies of this document to the Bitterroot National Forest since it was adopted) Ravalli County requests the Forest Service review the Ravalli County Natural Resource Policy and implement project goals and objectives that are supported by the policy.

Access and Transportation

Ravalli County supports maintaining and enhancing public access and the historic right to travel over public lands whenever necessary for human safety, emergency ingress and egress, especially for wildfire control, in the pursuit of fanning, ranching, timber harvest, hunting, mining, recreational activities, motorized vehicle use, access to irrigation infrastructure and other historic uses. "Potential impacts" of a future fire event should not be criteria for road decommissioning. Road obliteration on most of the roads in the project area will re-contour a naturally restoring road prism causing a significant visual disturbance visible for miles. These disturbances create not only negative visual impacts, but create prime locations for weed infestation, erosion and impacts to water quality. The Ravalli County Natural Resource Use Policy supports no net loss of roads and trails.

Elk Habitat

Many areas within the project boundary (that have not already burned) are choked with small unhealthy trees. These thick, unhealthy stands are not good elk habitat, these stands need to be opened up to promote the growth grasses and low lying vegetation.

Conclusion

Please consider these comments as part of the official record for the Mud Creek Project. We look forward to being actively involved with this project's development and analysis.

Sincerely,

Ravalli County Board of Commissioners

Jeff Burrows, Chairman

Greg Chilcott, Member

Chris Hoffman, Member