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December 6, 2019

Bitterroot National Forest Attn: Buckhorn GNA Project 1801 N. 1st street

Hamilton, MT 59840

Subject: Buckhorn GNA Project

Dear Project Manager,

The Mineral County Resource Coalition (MCRC) has been actively engaging in projects across the National Forests in Western Montana and Eastern Idaho for several years and we appreciate the opportunity to continue this involvement with the Buckhorn GNA Project. With a focus on Mineral County, the MCRC works across forest, county, and state boundaries to help develop economically viable projects that benefit our rural counties and communities.

We were first introduced to the Buckhorn GNA project area during our field reconnaissance of the Montana DNRC Gird Creek Project. Recognizing the need to address forest health issues outside the Gird Creek project area on adjacent lands managed by the Bitterroot National Forest, we wrote a letter requesting that the State work with the Forest to manage this area under the GNA authority. We appreciate the Bitterroot Forest and Montana DNRC's e?orts to come together to develop the Buckhorn GNA Project.

We have spent a considerable amount of time in the field looking at this project area. The lack of active forest management has created overstocked conditions with a greater number of trees per acre competing for limited growing space, water, nutrients, and sunlight. Trees in these stressed conditions are more susceptible to the e?ects of insects and disease epidemics as seen throughout this project area. Western spruce bud worm, Douglas-fir beetle, and mountain pine beetle activity is evident throughout the project area. By our estimates, 75 to 80% of the Douglas-fir is being a?ected by Dwarf Mistletoe and root rot. Poor forest health throughout this project area has created conditions that are conducive for uncharacteristic, stand replacing, wildfires. Therefore, active management is appropriate and necessary.

The scoping document talks in general about the need for this project but does not specifically identify a purpose and need for action. We suggest the following:

* Develop a project that is economically self-sustaining and improves forest health by building resilience to insects and disease through diversification of tree densities, structural stages, and species composition.
* Provide for the sustainable yield of timber from National Forest system Lands at a level that will help support the economic structure of local communities and contribute to the regional and national timber demand.
* Reduce the risk of wildfire and improve safety of the public and fire fighters by reducing ladder fuels and opening up the tree canopy to reduce the risk of crown fires.

* Bring existing roads up to BMP standards.

We understand and support the desire to use an improvement harvest to remove diseased and unnaturally high densities of shade-tolerant tree species and limit, as much as possible, the use of regeneration type harvests. However, we do not support leaving trees infected with dwarf mistletoe and root rot simply to meet a predetermined basal area ranging from 40 to 80 square feet/acre. Leaving these trees will allow the continued spread of the diseases and does not meet desired future conditions. We support the use regeneration harvests in areas greater than 40 acres as needed throughout the project area. As stated above, we do not support leaving disease infected trees simply to meet a predetermined desired basal area or to satisfy public perception.

We support the use of the Farm Bill CE under the Healthy Forest Restoration Act for implementation of this project. The forests in and around this project area are dying and losing value at an alarming rate due to the e?ects of insect and disease.

Overall project economics are a concern for us. The timber in the project area has a lot of quality and defect issues with low volumes per acre in many areas. Logging and hauling costs will be on the high end of things. There are approximately 28 miles of dirt roads that will be used to access this project. All have withstood the test of time with no catastrophic failures but recondition and BMP work will be substantial. With these things in mind we recommend the following changes to help improve the economic viability of the project:

* There are additional areas within the proposed project boundary that are accessed with existing roads that could be included for treatment, shown on the attached map outlined in red.
* We urge you to consider allowing ground-based logging operations of slopes up to 45% to reduce logging costs and improve project economics.
* Additional areas outside of the project area could easily be included by adjusting the project boundary further to the north and east into sections 13, 14, and 7, also indicated on the attached map outlined in red.
* Adding the additional acres for treatment will help improve project economics, especially where ground base logging can occur, and do more to improve forest health and reduce the risk of fire.

In closing, we appreciate the work being done to develop this project and to bring it ahead under the GNA authority. With the steep ground and health issues that plague our forests in Montana, the GNA program struggles to get projects that provide a return to the GNA program. We believe the changes we are suggesting will improve project economics and increase bidder participation. We urge you to take a serious look at our recommendations as you move forward with this project.

Respectfully,

CC:

Mat Anderson

Eric Winthers