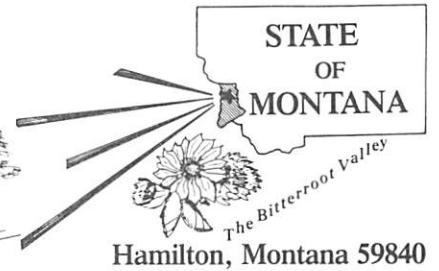
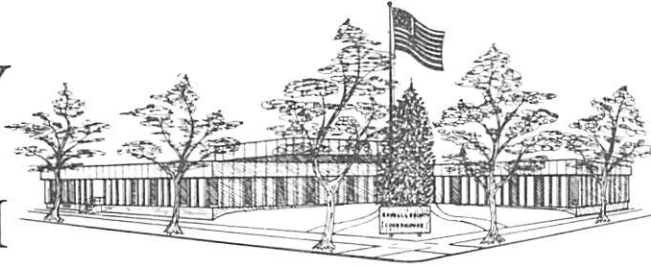


COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS
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April 3, 2021

Seth Carbonari
West Fork Ranger District
6735 West Fork Rd
Darby, 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

In our scoping comments the Ravalli County Commissioners requested 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 II-3)

Objective: Offer affordable sales (page II-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).

We request that the purpose and need include: *Provide Timber Product and Related Jobs*

Condition-Based Management (CBM)

Ravalli County supports CBM. We support the proposed action overview, but feel the upper limits for vegetation treatment are too low. There are multiple areas that were not considered for either commercial or non-commercial treatment that would have benefited wildfire reduction and/or wildlife habitat.

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. There are opportunities for harvest in IRA’s where road construction would not be necessary.

Ravalli County supports the use of regeneration treatments on areas larger than 40 acres. These large openings are critical components of resilient forest ecosystems. We support the use of commercial treatments in old growth, where non-commercial and prescribed fire alone will not result in effective treatment. Ravalli County supports road construction for the project, roads should be designed to minimize impacts to watershed, fisheries and habitat.

Specific Location Treatments with the Project Boundary

Castle/Cone (CC)

The CC Implementation Area identified zero acres for commercial harvest. We understand that most of this area is designated as Wilderness Study Area and/or Inventoried Roadless Area. We commented during scoping and are commenting again that commercial harvest treatments be utilized in certain areas (including IRA’s), especially adjacent to existing roads in the Nez Perce. 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.

Blue Joint

The area around Took Ridge Saddle should have increased commercial treatment, including regeneration units.

Project Specific Forest Plan Amendments

Ravalli County supports the use of project specific forest plan amendments for (1) elk habitat effectiveness, (2) thermal cover, (3) old-growth, (4) coarse woody debris.

Elk Habitat Effectiveness– We support the project proposal to allow the proposed drainages to not meet the elk habitat effectiveness requirements in the forest plan.

Thermal Cover – We support the variance from forest plan thermal cover requirements for this project.

Old Growth – We support the proposed evaluation for old growth for this project.

Coarse Woody Debris – We support the proposed site specific standards for coarse woody debris for this project.

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.

Implementation Process

Ravalli County is requesting the Forest Service formally recognize the unique government-to-government relationship between Ravalli County and the Forest Service. We understand and support the conditions based approach and that locations and types of treatments can be identified and refined during implementation. As such, coordination and cooperation with Ravalli County requires a continuous process throughout project initiation, planning, design and implementation. Forest Service guidance encourages and, in our opinion, requires the Forest Service to seek partnership with local government.

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 farming, 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 or arbitrary mandates 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. The idea of thermal cover as beneficial elk habitat is false and it has been proven that quantity and quality of forage is primary for elk habitat.

Climate

Vegetation management resulting from the proposed Mud Creek project will reduce the potential for emissions from catastrophic wildfire and beetle or disease mortality. Unhealthy forests in the project boundary have resulted in the forest going from carbon sinks to carbon sources. We are encouraging carbon sequestration through active forest management.

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,

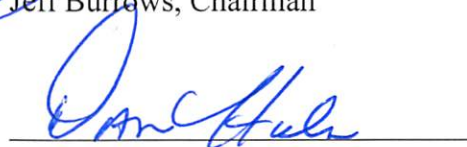
Ravalli County Board of Commissioners



Jeff Burrows, Chairman



Greg Chilcott, Member



Dan Huls, Member