



North Lincoln County Chapter

Dan Smith, President

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Fortine Ranger District
Betty Holder
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RE: MFMU/NLCC comments on the Galton Project

Thank you for this opportunity to participate in the Galton Project. Montanans For Multiple Use/North Lincoln County Chapter's primary concern is that Galton should not reduce opportunities for recreation, timber harvest, fire fuels reduction, aggressive fire fighting and improvements to forest health.

That is why we oppose any new wilderness recommendations in this area. In the early 80s the Kootenai NF decided that none of the inventoried roadless in this area was eligible for wilderness. This decision was made at a time when the discussion of wilderness was much fresher and the intent of the legislation better understood than it is now. What changes to wilderness statutes or to the intent of Congress with passage of this bill have occurred since then? If there has been a change in intent, how do you know a change has occurred and why has the wilderness bill not been amended?

For the following reasons there is no area within Galton that is suitable for wilderness:

- Proximity to private land along a long boundary
- A severely cherry stemmed and divided area due to the existence of and continued need and demand for open roads to Therriault Lakes, the North Fork and other high priority destinations.
- Present use and continued need and demand for snowmobile access. The present use includes an economic benefit to Lincoln County especially the Eureka area that recently lost a major employer, Owens/Hurst Lumber.
- Historical logging and the existence of old roads (some of which may be rs2477 public right of ways) in all of the inventoried roadless areas.
- The need to aggressively manage fire fuels in areas that are close to human development.
- There is already more than enough wilderness in NW Montana and Lincoln County. According to an NVUM survey only 2.5% of all visitors to Kootenai NF visit existing wilderness areas.

For the reasons listed above, MFMU/NLCC believes that it is time to release the Ten Lakes Wilderness Study Area for multiple use. To that end, we have circulated a petition which will be sent to the Montana Congressional delegation. We request that the Kootenai N. F. also ask Congress to release the WSA so that you can manage this area more effectively. Thirty-one years should be enough to study the area.

VEGETATION MANAGEMENT

Timber harvest for fuel reduction, jobs and forest health should be the top priorities of vegetation management. Currently vegetation is managed primarily for wildlife habitat and the demands of a small but vocal minority for “solitude”. We have come a long way from the old days of slash and burn. Because modern equipment is much easier on the land, we can log or thin these lands with little or no lasting impact. The science of forestry has taught us how to harvest responsibly so that our forests can provide an economic benefit to the national and local economies while restoring wildlife habitat, protecting water quality and reducing fire fuels at the same time. Passive or hands off management provides none of these benefits. Furthermore, Congress may look more favorably on the budget requests of a forest that produces jobs for taxpayers and returns some money to the treasury.

You should expedite salvage of ALL merchantable timber after fires to the fullest extent allowed by law and FS regulations. Even though the Roadless Rule may generally exclude harvest in roadless areas, it has provisions for harvest in order to protect roadless characteristics¹ and to reduce the risks of uncharacteristic wildfire². It is common to have an epidemic of bark beetles and other tree killing insects if burnt timber is not harvested soon after the fire. These insects then move into green timber surrounding the burn further degrading the roadless characteristics which include wildlife habitat and “landscapes with high scenic quality”. After the unsalvaged timber falls down it leaves a carpet of jack-strawed logs that renders the area unusable by larger animals for decades. These cured logs are rot resistant and will provide abundant fuel for another fire in the future. There may be provisions in other statutes or regulations that allow exceptions for salvage harvest. You should research and be prepared to defend at least some salvage in roadless areas.

You must salvage ALL timber from fire or bug kill that occurs outside of IRAs and the Ten Lakes WSA. It would be an irresponsible waste of a public resource to do otherwise.

It is quite possible that there will be yet another iteration of the Roadless Rule. You should take full advantage of any additional opportunities for salvage that are presented by a new rule.

You should adopt all of the above as goals for salvage harvest.

¹ Federal Register http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf §294.11

² Ibid §294.13

Outside of IRAs and the Ten Lakes WSA, average yearly harvest must equal or exceed net forest growth. This is the area where firebreaks and fuel reduction along with commercial harvest will occur. Since most of the Galton Area will be off limits to tree cutting, there is no excuse not to harvest the unrestricted area up to the limit of sustainability while observing all BMPs. In order to support existing timber operators as well as to encourage new infrastructure in the timber industry, you should commit to a minimum timber harvest based on 100% of annual net growth.

TRAVEL MANAGEMENT

There must be no reduction in snowmobile access to Ten Lakes WSA. In its review of the MWA lawsuit over motorized use in Montana WSAs, the Supreme Court required the Ninth Circuit to reconsider in light of *SUWA v. Norton*. In this case the Supreme Court overturned the 10th Circuit and agreed with the district court that BLM had authority to allow some motorized use inside a WSA. We have copies of both Supreme Court decisions and they are available on the internet. Since the Supremes referred to *SUWA* in their decision on MWA, it is clear that *SUWA* applies to the USFS as well.

Snowmobiling should continue because:

1. The Montana Wilderness Study Act allows pre-existing activities to continue
2. Grizzly bears are in hibernation until April 1 or later and are therefore not impacted
3. Scenic values are not impacted.
4. Soil is not compacted or eroded
5. Vegetation is not significantly impacted
6. Big game animals have moved to lower elevations
7. Snowmobile recreation is a healthy and valued recreation that is in high demand by Montana citizens. Our winters are long and our residents need some way to get out and enjoy the lands they love so much.
8. Snowmobiling has been excluded from most of the nearby high elevation public lands with semi-primitive recreation opportunities like Ten Lakes WSA

For the reasons cited above, snowmobiling should not be reduced outside the WSA. In fact, if we can find a way to expand snowmobiling opportunities outside WSA by doing some trail work it would take some pressure off of the WSA. There should not be a reduction in snowmobile grooming or season. MFMU/NLCC believes the season could be extended to April 1 because new studies document that grizzly bears, especially females, generally do not leave their dens until after that date.

There should be no reduction in summer motorized use for fire wood gathering, sightseeing, berry picking, fishing, camping and other types of recreation. There are so few summer roads open that we must insist that there will be no new closures or season reductions.

There should be no more road obliteration. Road rip is a waste of public funds and a “criminal” destruction of public property. These roads may be needed in the future. Furthermore they can be used right now for motorized trails and fire fighter access. If you need to bring them up to BMP standards, do so; it will cost less than ripping them and it will conserve the asset.

You should make access for fire fighting a top priority.

You should open selected old roads to ATVs and Trail Bikes. There are no motorized trails in this area and 158 miles of non-motorized trail. That lack of balance needs to be addressed. At least one long (20 miles) or two short ATV loop trails are needed. Loop trails should be at least 75% trail or closed road rather than open road and they must access some high elevation views.

You should consider new motorized summer and winter trail possibilities on Burma Rd, Williams/Krinklehorn or Deep Cr. Loops, Marston/Water Cr or Patrick Cr loop, Stahl/Clarence, Williams/Bluesky loop. We request that you solicit and enlist a volunteer group to work with you to study possible new motorized opportunities in this area. This group would look for desirable new OHV trails using mostly old roads and it would look at ways to collaborate with FS in the construction and maintenance of these trails. MFMU/NLCC will be glad to help in this work.

RECREATION

You should move toward a balance in recreation uses. This should be your top recreation priority. Change your focus from managing recreation to facilitating recreation. Take a look at making the Ten Lakes area including the WSA a “National Recreation Area. This would require legislation which the USFS could recommend just as you recommend wilderness.

To accomplish this priority you should

- Restore and increase motorized access (see Travel Mgmt)
- Build a warming hut/pavilion at Therriault Lakes.
- Locate and designate a motorized play area. This could be in an area that does not have sensitive environmental issues like stream crossings, erosion, grizzly bears, etc. A large gravel pit and the area nearby might be a good place to put this.
- Retain and create new motorized dispersed camping sites. The single unit pullouts along Grave Cr. are a good example.
- Work with user groups to ID and maintain desired trails
- Make travel maps available at many locations. Put a travel map billboard and kiosk on lower Graves Cr. Road to inform all recreationists of their opportunities and responsibilities.

FIRE MANAGEMENT

Reduction of fire fuels in the WUI must be your top priority. You will need to increase your activity in this area.

You should reduce fire fuels beyond the WUI as well. Any work you do in the WUI could be wasted if you do not reduce high levels of fire fuels beyond the WUI.

Create strategic fire breaks throughout the area except where IRA or WSA restrictions prohibit them. Since Blue Sky, Williams and Deep Creek are not in IRA you can make good fire breaks along these roads by clearing and thinning. We believe you can even cut inside the IRA using the provisions we cited under VEGETATION MANAGEMENT. You need to also increase the fire break capability of all other roads whether open or closed. You should also make an analysis of strategic places to create fire breaks beyond existing roads.

Adopt an aggressive policy of putting fires out early. An aggressive policy means:

- Put fires out early to save money, property, habitat, wildlife, water and air quality timber resources and many other valuable resources.
- Get crews on the ground at dawn when humidity, air and fire temperatures are low and the winds are more favorable. Timber crews on hoot owl have to do this. Why are fire crews exempt?
- Do some work at night. We used to do this and we did not have as good communication and other types of equipment as we do now. Look for ways to accomplish this instead of just ruling out the possibility without due consideration.
- Have plenty of trained crews with good equipment ready to go at the beginning of fire season. This includes contingency contracts for local subcontractors. Get the training and certification done during the winter and spring. Cut through the red tape involved with hiring contractors. Purchase or contract for tracked brush hogs to remove ladder fuels in a hurry.

Use gates instead of earth berms to close roads. Every minute that firefighters must wait for a cat to remove an earth berm results in a reduced opportunity to put the fire out early.

Give initial attack teams tools and permission **in advance** to open gates and cross streams so that they don't waste the opportunity to put the fire out early.

Never rip a road that provides primary access into a watershed. They are needed for fire fighting.

Fight ALL wildfires in the Galton area. Last summer several unfought fires in wilderness areas burned outside of the wilderness and destroyed valuable public and private assets as well as costing much more to fight. A creep fire inside the WSA may be allowed to burn for ecological reasons only if weather forecasts and fuel conditions indicate that the fire will not leap up and become a large fire. In these decisions you should always play it safe and lean toward aggressive fire fighting.

Use prescribed fire **only** after treatment. Prescribed fire is dangerous and wasteful. However, it may be necessary to treat the WUI inside of WSA. Extreme caution is mandatory. Before burning removal of ladder fuels with hand tools and horse logging may be necessary if you cannot use motorized equipment.

To comply with the legal requirements of taking public input, you must disclose all decisions, resolutions, actions or agreements that arise out of any private or joint meetings with the parties in the lawsuit just as soon as they occur.

We recognize that some of the actions we believe are necessary and beneficial may not be in compliance with the existing forest plan. **Use a forest plan amendment if necessary to implement these needed changes.**

IN SUMMARY

We are very concerned about:

- 1. The buildup of fire fuels throughout this area.**
- 2. Retaining present motorized access and adding more**
- 3. Restoring balance between competing uses**
- 4. No more wilderness in this area**

We hope that the Galton Project will begin a new era of real consideration of the needs of local citizenry and a return to balanced multiple use on forest land.

We are looking forward to working with you to flesh out these recommendations with workable solutions. Please keep us on your contact list for all communications regarding the Galton Project.

Respectfully,

Dan Smith

President, Montanans For Multiple Use / North Lincoln County Chapter