



687 W Canfield Ave Ste 100

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Via Email: [appeals-northern-regional-office@usda.gov](mailto:appeals-northern-regional-office@usda.gov)

March 9, 2021

Subject: **Redd Bull Draft decision Notice  
Superior District  
Lolo National Forest**

Responsible Official: **Carolyn Upton, Forest Supervisor**

Objection Review Officer  
USDA Forest Service  
Northern Region  
26 Fort Missoula Road  
Missoula MT. 59804

Dear Reviewing Officer,

Idaho Forest Group (IFG) wants to thank you for the opportunity to provide comments during the objection period for the Redd Bull project, and while we understand we are in the objection period, we offer these comments in support of the project, not to file a formal objection.

However, we understand the objection process and acknowledge the potential for others to bring forward objections that could change and or delay project design and implementation. It is our intention not to use the objection process to change or delay the project, rather we object to any changes to the project that would, reduce the number of acres proposed for treatment, increase project costs, or delay project implementation. Again, it is our intent to use the objection process to strengthen the project record and ensure timely implementation.

If other objections are brought forward that propose changes to the proposed action for the project, we are concerned that changes could be made that we would not support and we want to have a voice in that discussion. Additionally, if negotiations are opened up to address other objections, we would like the forest to reconsider Vegetation and Recreation comments listed below, that we made during the EA comment period, that were not included in this final decision.

#### **Vegetation Treatments:**

Thousands of hours have been spent with boots on the ground in the project area, identifying and ground truthing every proposed action included in the proposed vegetation treatments. IFG fully supports the vegetative treatments proposed in Alternative 2 with the following suggestions we believe could easily be included as either optional or alternative volume.

1. We understand the important roll prescribed burning plays with vegetation management, and we support the inclusion of fire where it is appropriate. With root rot and insects present throughout



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the project area and prevalent in many areas, trees already stressed in many cases will not survive a prescribed burn and or the ensuing insect infestations that will likely follow. While we have seen some great successes with the use of fire, we have also seen some unfortunate failures. We believe fire should be used as much as possible in conjunction with timber harvest. We do not support fire as an alternative to mechanical treatments or precommercial thinning. We also support the use of fire in isolated areas where commercial treatment is not an option due terrain or economic constraints. Specific recommendations by unit:

- a. LS1 – Five harvest units are located within this burn unit. The remainder of the unit is made up of dense overstocked plantations and commercial timber. We recommend this unit be dropped from the burn program or additional harvest units identified and PCT applied to the plantations prior to burning.
  - b. LS3 – The lower portion of this unit is planned for commercial harvest and we support the use of low severity fire in this area. The upper portion should be precommercial thinned only.
  - c. LS4 – Another unit should be added within this burn unit between harvest units W44 and X29, beginning at the north side of unit W44 extending out to the end of road 16570 where the new construction begins.
  - d. LS5 – This is a large area with a lot of commercial timber potentially at risk during burning operations. Our preference would be to see this unit dropped from the burn program. Our second choice would be to provide an option during harvest operations to increase the skid distance down the hill farther in the J units along the top of the ridge, and add additional units along the south side of the proposed new road construction at the top of the burn unit to provide an opportunity to salvage the commercial timber value prior to burning.
  - e. MS5 – Provide the option for the lower harvest unit boundary to be extended farther down the hill during harvest operations.
  - f. MS6 – With the dead, dying, and down timber in this unit it will likely burn relatively hot killing anything that is not already dead. Road number 8649 located within this burn unit will be used in conjunction with a temp road extension to access harvest unit D2. With access off this short road system additional timber should be harvested ahead of burning. Everything below the road from the intersection with road number 7848 down to the boundary with unit D2 should be included volume as well as allowing for high banking and potential tractor logging on the upper side.
  - g. LS7 – this unit should be dropped from the burn program and Precommercial thinning done in the plantations.
2. As we have stated, fire and the ability to control it is always a concern for us. We have the following additional comments for your consideration.
- a. Provide an option in the EA for quick response to salvage burnt timber in the event prescribed fires burn hotter than anticipated and or burn outside the proposed burn area.



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- b. Consider using shaded fuel breaks along the roads in the project area, especially within and directly adjacent to prescribed burn units.

#### **Recreation Activities:**

1. We want to thank the Forest for including a substantial amount of work to improve recreational activities within the project area. Recreation is extremely important to our local communities with Motorized recreation providing the greatest economic benefits. Except for the following suggested changes to trails, we support the Recreation Activities proposed in Alternative 2.
  - a. Trail #203 – According to the Lolo Forest Map dated 2014, trail #203 is open to motorized use. Our local collaborative, the Mineral County Resource Coalition and the Mineral County Commissioners have always assumed this trail was motorized. If that status has changed, please provide the information around that change. If the trail was changed from motorized to nonmotorized at some point, we respectfully request that status change back to motorized.
  - b. Trail #194 – We support the relocation of the gate and trailhead as well as the relocation of a portion of the trail, we do not support changing the trail from motorized to nonmotorized. As proposed, the new trail will utilize an existing section of road beginning at the new trailhead. This section of trail should be constructed to accommodate motorized use which will be consistent with the status of trail #203.
  - c. Trail #1203 – We support the trailhead change and construction of a section of this trail to avoid the private property. We do not support changing this trail from motorized to nonmotorized. This trail ties in with road #3803 that has seasonal restrictions. The trail could have the same seasonal restrictions. Additionally, this trail and road system ties in with road #7848 which is also proposed to be open seasonally to OHV use, which we also support.
  - d. Trail #201 – We do not support changing this trail from motorized to nonmotorized. The trail ties in with road #6314 and the trail could be subject to the same seasonal closure as the road.
  - e. Road #16321 – In our road treatment comments, we have proposed that this road be kept in the NFS roads and stored for future access to the area around Lenora Lake. This road could then be used to provide a nonmotorized trail to Lenora Lake. We respectfully request this road be put in storage as proposed in the road treatment section and a nonmotorized trail be cleared to improve nonmotorized access to Lenora Lake.
2. The rationale used to explain how the loss of 17 miles of open motorized trails turns out to be only 3 miles because some of these trails are not currently functional anyway does not seem an appropriate justification. We believe these trails should be left open as we propose for continued motorized use, and work planned to make them functional.



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In conjunction with the Mineral County Commissioners and the Mineral County Resource Coalition, Idaho Forest Group has spent hundreds of hours and invested significant resources, attending dozens of meetings, participating in numerous field trips, providing written comments, and performing field work to help identify and ground truth proposed actions for this project. We are intimately familiar with the Redd Bull Project and support the actions proposed in the Draft Decision Notice and finding of no significant impact, dated January 27, 2021.

We believe this huge investment of time and resources put into the project by a large group of diverse interests has resulted in a well-balanced project that successfully mitigates negative effects and achieves multiple project objectives. We believe the project should be implemented in a timely manner as proposed in the Draft Decision Notice.

If no other objections are brought forward that change the project proposal, and the Forest commits to implementing the project as proposed in the Draft Decision Notice, Idaho Forest Group would immediately withdraw these comments.

While we have not made a formal objection, we have expressed the desire to be involved in any resolution meetings if other objections are filed and we have provided comments we still believe would improve project design and improve the degree in which the project meets the purpose and need. The remedy to our concerns, is the commitment from the Lolo National Forest for the timely implementation of the project as proposed in the Draft Decision Notice with no changes.

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