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April 20, 2021

Bitterroot National Forest  
Attn: Mud Creek Project  
1801 N. First Street  
Hamilton, MT 59840

**Subject: Mud Creek Project Draft EA**

Dear Project Leader:

Offered on behalf of Idaho Forest Group (IFG), these comments are meant to support the Mud Creek Project and provide a few ideas we believe will improve the degree in which this project accomplishes the 7 items listed in the Need for the Proposal and the 4 items listed in the Purpose. We support the Forests decision to use an EA to fulfill the NEPA requirements.

**Purpose and Need:**

While we support the items listed in the purpose and need, we want to reiterate the request made in our scoping comments to include an additional item that acknowledges the need for the project to contribute to the economic needs of our rural counties and communities and contribute to the local, regional, and national demand for commercial products off our national forests.

**Collaboration:**

We want to commend the forest for the strong collaborative development of this project through public meetings and field trips that included members of the general public, recreationalists, Ravalli County Collaborative, Ravalli County Commissioners, and the confederated Salish and Kootenai Tribe. Projects developed in this strong collaborative manner have a much better chance of withstanding the test of time.

**Condition Based Management:**

We support the condition-based approach for implementation of this project. We believe this approach will address management needs more holistically and will be more responsive to changing conditions and allow more flexibility for managing under changing conditions.

**Proposed Action:**

The total project area encompasses approximately 48,523 acres with 35% of the area in the WUI and 73% identified as Community Protection in the 2016 Bitterroot Wildfire Risk Assessment. IFG supports the use of large landscape projects like the Mud Creek project, and we applaud the forests proposal to treat a large number of acres within this project area with commercial and non-commercial treatment and prescribed fire. However, as always, we are concerned about the potential loss of commercial timber during the burning

process. We understand there are a number of reasons that warrant the use of fire and we support that as it is appropriate. We do not support the use of fire as an alternative to commercial or non-commercial treatments. In those areas where the economics of commercial treatment are questionable, we suggest including these areas as optional volume.

**Forest openings exceeding 40 acres:**

The creation of openings that exceed 40 acres requires Regional Office approval. Forest conditions in the Mud Creek project area dictate the need to restart stands on a much larger scale and we support the decision to seek Regional approval for this proposed action.

**Project Specific Forest Plan Amendments:**

We support the proposed project specific Forest Plan amendments for forest plan standards related to elk habitat, thermal cover, old growth, and coarse woody debris.

**Roads:**

Providing a well-maintained open road system is critical for management of all forest resources from recreation to fire suppression efforts. Providing access for safe ingress and egress should be a primary concern during the analysis of road systems. We support the construction of specified roads and temporary roads as proposed in the EA. While we understand the need and support the proposal to close roads that are not critical for current or future vegetation management, we respectfully request that the forest keep in mind the need to maintain safe access for fire suppression, recreation, and general public safety.

**Recreation:**

Recreation is an important part of our rural community economics. While we are not familiar with recreational use Within the project area, we are strong supporters of including recreational development as part of all forest restoration projects. We support the addition of both motorized and non-motorized trail construction and reconstruction and respectfully request that the forest pursue all opportunities to develop loops for motorized use.

In closing, we believe the Forest has done a good job of addressing issues associated with wildlife, aquatics, rare plants, scenery, soils, and other concerns raised during the scoping period. A lot of hard work has gone into the development of this project and we hope the decision will acknowledge this work with a decision to implement the project at or near the upper limits proposed for vegetation treatment types.

Respectfully,



William R. Peck  
Idaho Forest Group  
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