



687 W Canfield Ave Ste 100

Coeur d'Alene, ID 83815

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April 26, 2021

Via Email: appeals-northern-regional-office@usda.gov

Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, Montana 59804

Subject: Bug Creek Integrated Resource Management Project
Flathead National Forest, Swan Lake District
Chris Dowling, District Ranger

Dear Reviewing Officer,

Idaho Forest Group (IFG) appreciates the opportunity to stay involved in the Bug Creek Project, now in the Objection phase of project development and decision making. 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 the Vegetation and Recreation comments we provided during the EA comment period, shown below.

The Purpose and Need for Action plays an important role in how a project is developed and what issues are to be addressed. While we support the intent of the items listed in the Purpose and Need for Action, we also believe they lack clarity. Additionally, we believe other important items were not addressed at all. We respectfully offer the following suggestions specific to the Purpose and Need for Action:



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1. Regarding #1: While this item addresses the need to improve firefighter safety, it mentions nothing about public health and safety. We believe the need to provide safe ingress and egress and provide for public health and safety should be added here.
2. Regarding #2: To add clarity, we believe this item should include the need to improve species composition and diversity and address both resistance and resilience of forest vegetative communities to the effects of wildfire, insects, and disease.
3. Regarding #3: No suggestions. This item is very important to local communities.
4. We would also suggest that an additional item be included in the statement of purpose and need. The proposed project should seek approaches that contribute to the economic sustainability and viability of local communities and help to support a dependable, consistent, viable and sustainable, supply of commercial products.

With 94% of the NFS lands in the project area identified as general forest and 86% of these acres specified in the Forest Plan for medium to high intensity vegetation management, it is disappointing that only 4,601 acres, less than 15%, are being treated in the project area (Alternative B) and even less, 2,181 acres (less than 7%), have a commercial component. With the large-scale forest health issues we face on our National Forests, we support large landscape projects like the Bug Creek Project. However, forest health issues within these large landscapes must be addressed at a much larger scale as well, if we are going to get ahead of our forest health issues. With the large number of acres within the Bug Creek Project identified as suitable for vegetation management, addressing forest health at a much larger scale is both needed and appropriate.

In closing, we want to reiterate the importance of these projects to our local community economics and respectfully request that the Forest identify this as a priority in this and future project development.

Respectfully,

William R Peck
Outreach Forester
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