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

August 16, 2021

Subject:

Mud Creek Vegetation Management Project
Matthew Anderson, Forest Supervisor
Bitterroot National Forest

USDA Forest Service
Northern Region
ATTN: Objection Reviewing Officer
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer,

On behalf of Idaho Forest Group (IFG), thank you for the opportunity to participate in the Objection Resolution process on the Mud Creek Vegetation Project (project). In conjunction with the Mineral County Resource Coalition (MCRC), we have been involved with the development of this project since early in 2019, performing field reviews and providing written comments during scoping and Draft EA comment periods.

We strongly support the Draft Decision Notice and finding of No Significant Impact (FONSI) document for the Mud Creek Vegetation Management Project, and we object to any changes to this document that may be considered as a result of other objections submitted during this Objection Resolution Process. If no other objections are submitted, we would immediately withdraw this objection.

However, if other objections are submitted that will be considered during the resolution process and could potentially affect the outcome of the project, then we respectfully request that the Reviewing Officer consider the following comments and requests we have previously submitted during other comment periods.

1. Our comments throughout the development process for this project have included a request to address the potential affects this project would have on the economies of our rural counties and communities. With nearly 90 percent of the acres in Mineral County owned and managed by the US Forest Service, we are highly dependent on our surrounding forests for our economic stability. Commercial forest products generated from this project are essential to our forest

products industry, provide both direct and indirect jobs, and contribute significantly to our local economies. Once again, we respectfully request that the project record recognize the need for this project to contribute to our rural community economic needs.

2. We strongly support the condition-based management approach which we believe is more responsive to change and allows flexibility to achieve desired future conditions.
3. Forest conditions in the Mud Creek project area dictate the need to restart stands on a much larger scale. We support the creation of openings over 40 acres at whatever scale necessary to accomplish silvicultural prescriptions and address the issues identified in the purpose and need for action.
4. 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.
5. Providing a well-maintained open road system is critical for management of all forest resources including recreation, fire suppression and commercial forest product removal. 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 road closures that are not critical for current or future vegetation management needs, we respectfully request that the forest keep in mind the need to maintain safe access for fire suppression, recreation, and general public safety.
6. 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 forest restoration projects like the Mud Creek project, and we support the forests assessment that identifies a large portion of the project area that could be treated commercially and non-commercially. A large portion of the landscape within the project area is also identified for potential treatments with prescribed fire. 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 other non-commercial treatments. In those areas where the economics of commercial treatment are questionable, we suggest including these areas as optional volume that could be removed prior to burning.
7. 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 within this project area.

We have spent many hours over the past couple of years watching this project develop and providing input we believed would help improve project design and contribute to the need to increase the pace and scale of forest restoration. We recognize all the hard work the Forest has put into the development of this project and do not wish to see implementation delayed. We are participating in the objection resolution process to provide additional support for the project as proposed in the draft decision notice and FONSI and to ensure we have a seat at the table if changes to the project are proposed.

Our suggested remedy to resolve our objection is simple and straight forward, move the project ahead as proposed in the Draft Decision Notice and Finding Of No Significant Impacts with no changes.

In closing, we believe the Forest has done a good job of analyzing and addressing management concerns associated with wildlife, aquatics, rare plants, scenery, soils, and other concerns raised during the scoping and DEA comment periods. A lot of hard work has gone into the development of this project, and we hope the final decision will acknowledge this work with a decision to implement the project as proposed in the Draft Decision and FONSI document.

Respectfully,

A handwritten signature in blue ink that reads "William R. Peck". The signature is written in a cursive, flowing style.

William R. Peck, Outreach Forster
Idaho Forest Group
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