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Organization: Idaho Forest Group

Title:

Comments: Dear Project Leader:

These comments are being offered on behalf of Idaho Forest Group. Our sawmill in St. Regis Montana depends heavily on the commercial timber provided by our National Forests in Western Montana. The Mud Creek project is an important part of our program and we appreciate the effort from the Bitterroot National Forest to move the project forward.

## PROJECT PURPOSE AND NEED

While we support the three focal areas identified in the Purpose and need (discussed in detail below), we strongly believe it is appropriate to add a fourth focal point. Our rural counties, communities, and citizens depend heavily on the natural resources provided by our National Forests for their economic stability. The Purpose and Need should acknowledge the economic needs of our rural communities and include a statement that illustrates the projects need to help address economics by contributing to the growing demand for timber and looking for opportunities to improve recreation within the project.

1. Improve landscape resilience to disturbances (such as insects, diseases, and fire) by modifying forest structure and composition, and fuels.

Page 1, Paragraph 1 of the scoping document states that vegetation treatments will be focused primarily in the Wildland Urban Interface (WUI). While we support an aggressive management approach to reduce the risk of uncharacteristic wildfires and improve public and firefighter safety within the WUI, we also believe the same management strategy should be applied across the entire project area. Poor forest health and high fire danger across the entire project area is discussed throughout the scoping document. Desired Conditions following Treatments in the scoping document calls for desired future conditions at the landscape scale to be a mosaic and diverse landscape that is adaptable and resilient to natural disturbances such as insects, disease, fire and climate variability.

2. Design and implement a suitable transportation and trail system for long-term land management that is responsive to public interests and reduces adverse environmental effects.

We believe the issues with roads and trails should be addressed across the entire project area. As indicated in the scoping document there are maintenance and BMP improvements needed throughout the project area.

Managing more acres will help pay for road improvements across the project area. There new roads should be constructed to access stands that are not currently accessible both in and out of the WUI. Again, by performing vegetation and road management at the landscape level, we are doing a better job of meeting the objectives in the purpose and need.

3. Conduct a Programmatic Forest Plan amendment related to elk habitat objectives.

We support the Programmatic Forest Plan amendment that will utilize more recent science for managing elk habitat.

4. Economics.

We should strive to develop projects that are economically viable and provide project income to help pay for desired work within the project boundary. Managing more acres over the entire project landscape will increase income in the form of timber receipts. This will also increase the volume of commercial products and provide greater economic stability to our rural communities.

In closing, we respectfully request that you consider treating as many acres as possible on the project area. The entire project area would benefit from active management.

William R. Peck

Idaho Forest Group