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Comments: November 19, 2018

USDA-Flathead National Forest (FNF)

Swan Lake Ranger District

Attn: Sandy Mack, Team Leader

Region 1 Office

24 Fort Missoula Road

Missoula, MT 59804

Re: Comments for Proposed Action for Mid-Swan Landscape Restoration and Wildland Urban Interface Project.

Dear Sandy Mack:

Pyramid Mountain Lumber, Inc. in Seeley Lake submits the following comments on the Mid-Swan Landscape Restoration and Wildland Urban Interface Project. We fully support this project with additional comments below.

We appreciate the scale and scope of this project and commend the Forest Service (FS) for proposing large landscape area project analysis. We understand the logic for using photo interpretation (PI) in terms of efficiency. However, we also encourage boots on the ground to ground truth what[rsquo]s actually happening on a specific point in the forest.

In the scoping document, it states PI was used to identify roads that might need [ldquo]Stormproofing[rdquo], but also requires ground truthing.

[ldquo]Stormproofing[rdquo] is a new term to us. After reading the definition of Stormproofed and then your definition on Best Management Practices, we do not see the difference [ldquo]A stormproofed road is one where measures have been taken to upgrade the road so as to minimize the risk and potential magnitude of future

erosion and sediment delivery. It generally consists of reducing hydrologic connectivity; identifying and treating potential road failures (mostly fill slope failures) that could fail and deliver sediment to streams; and reducing the risk of stream crossing failures and stream diversion. This also could include the application of road Best Management[rdquo]

[ldquo]Best Management Practices (BMP) are the method(s), measure(s), or practice(s) selected by engineers and biologists to meet nonpoint source (i.e. not coming from a single location) sediment or pollution control needs. Best management practices include but are not limited to structural and nonstructural controls and operation and maintenance procedures. Best management practices can be applied before, during, and after pollution-producing activities to reduce or eliminate the introduction of pollutants into receiving waters (36 CFR [sect] 219.19).[rdquo]

Since there is no such thing as [ldquo]Stormproofing[rdquo], just as there is no such thing as [ldquo]Fire-proofing[rdquo] a forest, we suggest you link Stormproofing directly to BMP[rsquo]s rather than define it as something different. We believe this term should be defined as the well-established Best Management Practices (BMP).

We do not object to building 60 miles of new road, as long as they are truly designed with BMP[rsquo]s implemented, and necessary to achieve on the ground objectives. Decommissioned, stored or improved roads identified by air photo need to be individually ground truthed with boots on the ground. We are not in favor of Decommissioning roads that might be needed for future management, i.e. fire protection, forest management, especially ones identified from an air photo. Storing roads with proper BMP[rsquo]s, grass seeding and closures are the best way to maintain future access as identified in transportation planning. There are many legacy roads adjacent to creeks that contribute sediment to streams and need to be repaired or moved. Other roads in riparian areas just need BMP[rsquo]s implemented.

We support improving fish passage on the five fish blockages noted in the document and also support installing Beaver Analog Structures to improve habitat and water storage.

The analysis states that 40-60 mmbf of volume would be harvested with implementation of this project which we strongly support. However, this volume needs to be sawlog volume that can be utilized by local sawmills and not just non-saw (pulp). We understand that removal of non-saw can be a part of any project, but non-saw almost never pays its way to the chip plant. Supplying sawlogs to local sawmills needs to be an emphasis in this project. We need to keep the timber industry healthy from the local logger, trucker, sawmill and to the associated businesses supplying the industry.

Pyramid appreciates the opportunity to comment on Mid-Swan and fully supports the project. Should you have any questions or comments, please contact me.

Sincerely,

Scott Kuehn

Resource Forester

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