Data Submitted (UTC 11): 10/5/2020 6:00:00 AM First name: Scott Last name: Kuehn Organization: Pyramid Mountain Lumber Title: Comments: Re: Comments on Draft EIS for Mid-Swan Landscape Restoration and Wildland Urban Interface Project.

Dear Kurt Steele:

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

We appreciate the scale and scope of this project and commend the Forest Service (FS) for proposing large landscape area project analysis.

We are disappointed that sustainable commercial timber harvest was not mentioned in the Purpose and Need. Local sawmills need a steady, consistent flow of commercial sawlogs to keep Montana's timber industry strong and healthy. RY Timber mothballed their sawmill in Townsend, MT sending devastating ripple effects throughout the local and regional economy. There are only seven large sawmills left in Montana and we need to keep them all. In this project, removal of commercial timber is vital to help meet and pay for the other elements in the Purpose and Need. Table 205 in the Draft EIS shows the need for stumpage value from commercial harvest to help offset the costs of implementing projects. We feel commercial harvest is such an essential part of this project, it should have been stated in the Purpose and Need.

In our previous comments on this project, we mentioned our concern over using the term "Stormproofing."

Mid Swan definition of Stormproofing: "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"

Montana Best Management Practice (BMP's) definition 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)."

In our opinion, they are one in the same. There is no such thing as "Stormproofing", just as there is no such thing as "Fire- proofing" a forest. On one of the field trips for this project, one of the Forest Service Fuels/fire specialists used the word "Fire-proofing" in his talk to the group. Much of the public understands the term and use of BMP's. BMP's and the SMZ laws have been around since 1990. Introducing a new term with the same basic definition of one used for 30 years will just confuse people.

We noticed you did drop the building 60 miles of new road to 38 miles in this draft. Looking at the maps of the proposed roads, this change is acceptable. We would still rather see roads stored versus decommissioned

(Obliterated) unless they are or could deliver sediment to a stream.

We strongly approve of removal of commercial products, but this should be sawlog volume that can be utilized by local sawmills and not just non-saw (pulp). Though removal of non-saw can be a part of any project, 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.