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First name: Scott

Last name: Kuehn

Organization: Pyramid Mountain Lumber, INC.

Title: Resource Forester

Comments: May 18, 2022

Re: Bitterroot Front Project comments

Dear Steve Brown:

Pyramid Mountain Lumber, Inc. in Seeley Lake submits the following comments on the Bitterroot Front Project.

Pyramid Mountain Lumber (PML) is the oldest family owned and operated sawmill in Montana and has operated in Seeley Lake Montana for the last 73 years.

Pyramid Mountain Lumber fully supports this project. This project covers 143,983 acres and we fully support large landscape level treatments as proposed on this project.

We fully support the Project Objectives:

- * Reduce Fuels
- * Improve landscape resilience to disturbances
- * Seek Wildlife habitat opportunities
- * Contribute to the local economy and forest products industry through fuels reduction activities and timber production.

Supporting the local economy and the remaining timber related industries is a huge factor in this project. Over 55,000 acres of commercial harvest are planned for this project. We have lost all of the large sawmills in the Bitterroot over the last 30 years. There are a few remaining smaller operations in the valley that need a timber supply to stay in business. As each mill closed its doors, it wasn't just the mill employees that had to find new employment, but all of the other businesses that support these mills and their employees, Tire stores, fuel, parts, restaurant businesses all suffer when a mill closes.

With the loss of these mills in the valley, sawlogs now have to be trucked hundreds of miles to one of the remaining sawmills. Though non-saw products (Pulp logs, post and Poles) do help the local businesses, sawlogs need to be an important product when treating these acres.

A large portion of the Project area falls within the Community Wildfire Protection Zone (CPZ) and the Wildland Urban Interface (WUI). We don't have to look back very far at the large fires on the front in the past 10 years. Though no treatment will make a forest fire-proof, proposed treatments will help slow the rapid spread rate on these fires and allow firefighters a better chance in keeping them small.

We support the use on new harvesting technology emerging, including Cable Assist and Tethered Logging. This technology is quickly outpacing old antiquated Forest Plan language, i.e. "No ground Base skidding over 35%."

That language was based to traditional tracked or rubber tire machines, not this new technology. A recent study from Oregon State University on Cable Assist and Tethered Logging showed little to no increase in soil compaction and ground disturbance even on slopes over 60%.

We support the use of Designation by Prescription (DxP) and Designation by Description (DxD). In my opinion, todays professionally trained loggers are as good at following a prescription from the seat of their Feller-Buncher as the Regions Strike Team with paint guns. Write prescriptions based on end results. Look at the large picture and get away from worrying about if every tree is 12" or 13". This is a landscape project, write prescriptions with the goal of what you want it to look like after treatment.

Treatment on a landscape level needs to be the goal, not isolated parcels of restoration. A recent large-scale project was proposed on another Montana National Forest, and in the end the project was cut half, with no clear answer if the other half dropped will ever get treated. Design it as a large-scale treatment and keep that as your goal.

Again, PML fully supports this landscape level project.

Please contact me if you have any questions.

Sincerely,

Scott Kuehn

Resource Forester