Data Submitted (UTC 11): 9/9/2019 6:00:00 AM First name: Scott Last name: Kuehn Organization: Pyramid Mountain Lumber, Inc Title: Resource Forester Comments: September 9, 2019

USDA-Bitterroot National Forest (BNF)

Mud Creek Project

1801 N. First St

Hamilton, MT 59840-3114

Re: Mud Creek comments

Dear Matt Anderson:

Pyramid Mountain Lumber, Inc. (Pyramid) in Seeley Lake submits the following scoping comments on the Mud Creek project.

Pyramid fully supports this proposed project. Within the project area, there are 175 structures, 35% (17,171 acres) considered Wildland Urban Interface (WUI) and 73% (35,486 acres) identified as Community Protection based on the 2016 Bitterroot Wildfire Risk Assessment. This area is in dire need of treatment to help protect life and property and maintain forest health.

We strongly support the use of timber management to meet the desired future condition outlined in the management goals for this project. The emphasis though needs to be on sawlog production, not just non-saw. Sawlog production provides the income to help pay for some of the other management goals. Though non-saw removal maybe important to the overall project, it never pays for itself and has to be subsidized by sawlog income, reducing the funding for other goals. Economics should always be considered when designing these projects.

Pyramid also supports the need for road Best Management Practices (BMP's) upgrades in the project area. We support storage of roads over decommissioning unless direct sediment delivery from these legacy roads can't be controlled through BMP's.

In regard to Dwarf Mistletoe in the Douglas-fir, Pyramid supports the active management of stands with Dwarf Mistletoe. Though the parasite can't be completely eradicated, management in these stands should include removal of any infected tree. Any infected trees left, should be girdled to prevent further spread, but retain the wildlife quality these trees provide.

In regard to management of the 1645 acres of terrace plantations, Pyramid supports a site-by-site determination of future management.

Pyramid Mountain Lumber, Inc. appreciates the opportunity to comment on the Mud Creek Project and fully

supports active management at the Landscape level. Should you have any questions or comments, please contact me at your convenience.

Please contact me if you have any questions.

Sincerely,

Scott Kuehn

Resource Forester

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