



September 24, 2019

USDA-Bitterroot National Forest (BNF)  
West Fork Ranger District  
Attn: Piquett Creek Project  
6735 West Fork Road  
Darby, MT 59829

Re: Piquett Creek comments

Dear Seth Carbonari:

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

Pyramid fully supports this proposed project. Within the project area, there are 96 structures, 67% (3,888 acres) considered Wildland Urban Interface (WUI) and 97% (5,624 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. We support the use of dips and gravel to lessen sediment delivery.

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.

We have concerns as to why truckloads of logs are limited to 500. Why limit the project based on number of log trucks? The scoping letter does not distinguish between sawlog and non-saw products, just 500 loads. We think this could limit the project and may not meet the purpose and need.

It is unclear in the documents as to why hauling is curtailed on November 15<sup>th</sup>, and no snow plowing is allowed, yet winter harvest conditions are described under Soils, Ground Based Harvesting. More detail would be appreciated.

Ground base yarding will be limited to slopes under 35%, yet the Forest Plan allows up to 40%. This should be a site by site decision and not a blanket restriction.

The documents say hauling is restricted to FRS 49, 731, 5720 and 5724 (and their spurs) but does not clarify why hauling would be restricted to these roads. More detail would be appreciated.

Pyramid Mountain Lumber, Inc. appreciates the opportunity to comment on the Piquett 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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