



VIA Email: <https://cara.ecosystem-management.org/Public//CommentInput?Project=56774>

October 11, 2019

West Fork Ranger District
Attn: Piquett Creek Project
6735 West Fork Road
Darby, Montana 59829

David Fox, Project Leader:

On behalf of Idaho Forest Group (IFG), thank you for the opportunity to comment on the Piquett Creek Project. The entire Bitterroot National Forest lies well within our St. Regis working circle and is very important to our operations here. An active forest restoration program that includes projects like Mud Creek and Piquett Creek that contributes to the local and regional need for timber is critical to the success of ours and other sawmills in Western Montana.

Project Development:

As I read through the scoping letter, I was impressed with the effort put forth by the Forest to involve local collaboratives, Organizations, and local residence and businesses during the pre-scoping phase of the project. Additionally, I was equally impressed with the list of common themes that was developed as a result of this collaborative process. However, in reading through the list of common themes, it is obvious that the timber industry was not represented in these early pre-scoping discussions, through no fault of the Forest Service. We (industry) obviously dropped the ball.

IFG prides itself in our support of the collaborative process and our involvement in project development from the earliest stages of pre-scoping to the final ROD. We apologize for our lack of involvement up until now (an issue we plan to resolve), and we appreciate the opportunity now to get involved at this stage with project scoping.

Purpose and Need:

A single goal was established for the Piquett Creek project with four needs identified to accomplish that goal. This goal appears to be consistent with the themes that were developed collaboratively during pre-scoping project development. With respect to this collaborative process, we support this goal and the underlying needs identified. However, we would like to see an additional goal added to the Purpose and Need for the Piquett Creek project.

For years now we have been discussing the depressed economic conditions our rural counties, communities, and their citizens deal with on a daily basis and the important roll our National Forests have in helping to support the economic viability of these communities. Current direction from the Washington and Regional Forest Service Offices emphasizes the need to include community economics in the development of

restoration projects on our forests. We respectfully request that the Forest add a goal to this project that expresses the need for the project to contribute to the local, regional, and national demand for timber products to our local sawmills providing good paying jobs and helping to improve the economic stability of our rural communities.

Additionally, our local forest industry provides the tools and generates most of the funds through timber receipts needed to accomplish the other work identified in the Purpose and Need and the Proposed Actions for this project. We are fortunate to have a somewhat healthy forest industry in Western Montana that can provide the means to accomplish this work, a luxury not all forests have and we should strive to protect.

Proposed Actions:

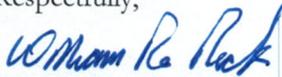
IFG supports the development of this project under the Wildfire Resilience Categorical Exclusion authorized under Section 605 of HFRA (16 U.S.C.6591d).

Under the Proposed Action heading, there is a list of activities that could be included. With the following exceptions we support the propose activities.

- Haul restrictions to the roads listed. Without additional information it is hard to figure out how the roads listed will be accessed without at least a partial use of road 5723. We only ask that the Forest confirm that the roads listed will provide the access needed to complete desired restoration activities.
- The need for restoration in the project area is well documented throughout the scoping document. We don't believe this restoration need should be based on a predetermined maximum number of 500 truckloads. The area is all in management areas that allow timber harvest, if harvest activity is the tool that is most appropriate to complete the desired management goal, then that is what should be used no matter the number of loads created.
- Restrictions that effect when operations can occur are sometimes necessary to protect a specific resource and we support that when it is legitimate. These restrictions can be expensive and limit the amount returned to the government in the form of timber receipts. In some cases, potential bidders can even be priced out of the bidding process. A statement that hauling will only occur on dry roads is far to open ended and leaves way too much to personal interpretations. We suggest a statement in the contract that says no hauling when it creates irreparable resource damage is far less ambiguous.
- It states that all roads that cross streams will be graveled prior to any hauling. We wonder if that means the entire road or just the portion of the road that crosses the stream.
- We believe there should be a statement to ensure all roads will be brought up to required BMP specs.

In closing, IFG wants to thank you for your continued effort to improve forest health, reduce the risk of wildfire in the WUI, and provide for public and firefighter safety. Active forest restoration projects like the Piquett Creek project are vital to the forest's restoration strategy.

Respectfully,



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