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Objection Reviewing Officer
USDA Forest Service Northern Region
26 Fort Missoula Rd.
Missoula, MT 59804

October 24, 2021

Re: Comments on the DROD and FEIS of the Mid-Swan Landscape Restoration and Wildland Urban Interface Project

Pyramid Mountain Lumber, Inc. is the largest and longest family-owned and operated sawmill in Montana. Nestled in the heart of Seeley Lake, we are the one of largest employers in the Seeley-Swan area. Since 1949, we have employed countless sawmill workers and contractors in and around the valley. Stewardship isn't just an area of familiarity for us, it is who we are and embedded in the mission of our company. We have completed several forest stewardship projects in the past and currently are working on multiple stewardship projects with the Flathead National Forest.

Pyramid offers the following objection comments to the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (DROD) of the Mid-Swan Landscape Restoration and Wildland Urban Interface Project:

Pyramid's overall response is favorable and we support the adoption of Alternative B. The actions proposed in this alternative align with our stewardship values and appear to be beneficial for the surrounding communities both economically and ecologically.

While we support the proposed Alternative B and its 18,000 acres of commercial harvest, we are concerned with the overall reduction in the treatment of commercial harvest acres from 38,000 down to 18,000 and we hope that the 20,000 acres that were originally considered for commercial harvest will be reconsidered for treatment, if at least in a future project. We also hope that the commercial harvest acres that are in this decision truly consist of commercial product viable for a sawmill and not just sub-merchantable material that would be more fit for chipping plants and other outlets. We also hope that revenue from the commercial harvests has been a tool used in considering additional treatment types in this decision and how much of it is being done, sawlog revenue can help fund additional treatments.

We strongly support the improvement of 225 miles of FS roads to BMP standards. While we support the 10.7 miles of new permanent road and 6 miles of temporary road construction, we also support the decommissioning of roads that would not provide any use for future management activities or for response to incidents that threaten public safety such as wildfires. We realize that the project area has many areas with extensive road systems in place and hope that the roads that are decommissioned are being done so out of consolidation and not restricting public or commercial use.

We are pleased to see the considerations of sensitive species such as Whitebark Pine and support the restoration efforts intended to do so.

We hope that due consideration of the public is taken into account with prescribed fire and that it is not only communicated well and done safely, but that utmost effort is given in retaining wilderness character when working in and around designated and recommended wilderness. We are a proponent of prescribed fire as a restoration tool and hope that it is considered alongside mechanized and non-mechanized fuel treatments (where applicable) and not simply as a replacement that ignores those treatment methods.

We hope that opportunities for stewardship projects arise with this decision and that efforts are taken to ensure that this project is favorable for local contractors and businesses. We also hope that consideration is given to allow small businesses classified by the Small Business Administration (SBA) as a small business, ample opportunity to compete in bidding processes involving the treatments in this decision. We hope that small business set-aside (SBA) sales are a consideration in the commercial harvest treatments as well.

In closing, we would like to restate that we are in support of the Mid-Swan project and the alternative chosen in the Draft Record of Decision. We genuinely appreciate the opportunity to comment and welcome additional opportunities to do so. Please feel free to reach out with questions, comments, or concerns

Sincerely,

A handwritten signature in cursive script that reads "Zachary Bashoor".

Zachary Bashoor
Resource Forester
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