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Mr. Jamie Barbour  
Assistant Director  
Ecosystem Management Coordination  
USDA Forest Service  
Washington, DC

August 29, 2022

Re: Fed. Reg. 42493-42494 Vol 87, No. 135 July 15, 2022-Old Growth and  
Mature Forest Definition and Inventory

Dear Mr. Barbour:

Pyramid Mountain Lumber, Inc. appreciates the opportunity to provide the following comments on the Federal Register Notice regarding Old Growth and Mature Forests. We are a small family owned sawmill located in Seeley Lake, Montana. We have been in continuous operation by the same family that started the mill in 1949. As a non-fee landowning mill, we are completely reliant on all other landowners to provide our much needed raw materials to employ the 130+ hard working Montana families and the 200+ loggers, truckers and derivative businesses that survive based on the consistent, high quality boards and dimension products. We produce from all sizes and species of logs sourced from across Montana. Our survival has been a direct result of nimbleness in the market place and long term relationships and partnerships with federal, state, tribal, private landowners and numerous NGO's, elected officials and various rural community leaders.

Pyramid's interaction with hundreds of folks from different rural communities with very diverse backgrounds who represent broad interests in natural resources has been very rewarding and enlightening in terms of common and differing values. In our experience, no one we work collaboratively with has expressed concern associated with Old Growth or

Mature trees because the federal agencies manage their forests under individual Forest Plans or Resource Management Plans. These plans provide for conserving, protecting and managing these late successional stands. The U.S. Forest Service across Region One utilizes the species groups and biophysical units outlined in Green et al. The Bureau of Land Management utilizes definitions and management direction for Old and Mature forests whose location is not static due to insect, disease and wildfire disturbances. This approach is scientifically very applicable considering plant succession which functions as a continuum over time as stands develop into complex plant communities unless they are reset by disturbance or stressors from insect, disease, drought or wildfire.

The standard prescription for Federal agencies treating Old Growth stands or late successional mature stands is to protect the largest, veteran, legacy trees by removing the competition for soil and water resources. Active management reduces stress on these individual trees while protecting the associated vegetative component in the understory. Managing these Old Growth or late successional stands to restore the structure of natural mosaic through vertical and spatial diversity while managing polygons for seral species. Collectively these treatments improve resilience to wildfire and improves wildlife habitat. Federal forestry professionals search out stands with old or mature forest characteristics in project areas to intentionally manage them differently than adjacent stands.

Approximately 80% of all federal forest lands in Montana are excluded from any active forest management and road construction which therefore, means millions and millions of acres will never receive any human caused treatment. Management of these lands is served up by mother nature...very unpredictable and mostly heavy handed with the extreme fuel loadings that exist today at crown level and with ladder fuels below. The last lightning storm a few days ago in Seeley Lake generated 1000 strikes in one day..which is quite common in this area. Many Ranger Districts in Montana average 5-7000 strikes each year which means there will always be an ignition source.

The Montana Forest Action Plan has identified over 9 million acres of forested land at risk from insect, disease, wildfire and overall forest health. Non-reserved Federal forest ownership comprises 65% of these acres in need of active forest management. The current administration's direction and focus to increase pace and scale of treatments for fuel reduction and fire

resilience to protect communities and other resources applies to all sizes and ages of trees in our unrestricted landscape to be effective in improving forest health and providing wildfire resilience. Restoring forested lands to assimilate the Natural Range of Variability while considering future climatic changes is the most effective approach to creating and maintaining healthy forests. Such forests are then most capable of sequestering more carbon in a compressed period of time while increasing growth and vitality of selected leave trees.

Mature trees and forests across Montana on fringe federal lands excluded from treatment exhibit closed canopies and are more homogenous. They are lacking mosaic or patchiness and have been neglected for decades causing deterioration from insect, disease and other forest health issues. These lands, when healthy, provide high value habitat for wildlife and fisheries, recreational opportunities, water quality and forest resources which can help to support the economic fabric of rural communities. All species of trees in Montana and across the U.S. have different ages and sizes at the culmination of mean annual increment. It would be impossible and scientifically impractical to even attempt to craft a policy revolving around size and/or age. Suppressed, shade tolerant species can survive for 100+ years at 1" diameter and 2' tall waiting to be released from the competitive overstocked canopy or burned with the next fire.

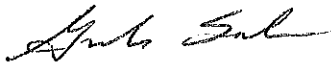
Today's management across federal lands in Montana focuses on leaving larger, healthy trees to provide a future seed source. The science behind managing Montana's forests and the succession from early seral to late successional is clearly established in Arno and Feidler's "Douglas-Fir" and "Mimicking Nature's Fire", and Pfister's "Forest Habitat Types of Montana", as well as numerous additional peer reviewed publications. Stands with diverse age classes and size classes provide for a healthy, sustainable forest.

In conclusion, from Pyramid's perspective, this effort is very untimely as agencies work diligently to comply with and implement the various provisions of the Infrastructure Bill and translate their efforts into deliverables on the ground. The agencies have been short of manpower in all disciplines prior to the passage of IJA and continue struggle to add employees to their workforce. The additional workload embodied in the Executive Order compromises their ability to deliver results expected by

Congress when they passed IIJA as well as GAOA. The once in a lifetime long term funding provided by IIJA will be at risk without deliverables.

Pyramid appreciates the opportunity to provide comments on the Federal Register No. 135 July 15, 2022-Old Growth and Mature Forest Definition and Inventory and encourage you to follow the lead provided by the Society of American Foresters science based comments and recommendations in your final deliberations. It appears that the Executive Order issued which generated this notice was an effort to create a solution in search of a problem.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gordy Sanders".

Gordy Sanders  
Resource Manager  
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