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USDA – National Forest Plan Revision  
Lolo National Forest Plan Revision Team  
Attn; Amanda Milburn, Team Leader

Re: Lolo Forest Plan Revision, preliminary Wilderness and Wild & Scenic Rivers inventory

Dear Amanda,

Pyramid Mountain Lumber, Inc. submits the following comments on the preliminary Wilderness and Wild & Scenic inventory for the Lolo Forest Plan revision process.

Pyramid Mountain Lumber (PML) is the oldest family owned and operated sawmill in Montana. The mill has operated in Seeley Lake, Montana for continuously for the last 73 years. As “The Stewardship Company,” PML fully supports this project because it is in line with our land management values.

After reviewing the extensive preliminary Wilderness inventory, we do not feel any areas were missed for consideration as proposed Wilderness. The primary area we believe should be recommended for Wilderness in the new Forest Plan is all recommended Wilderness outlined in the Blackfoot Clearwater Stewardship Act (BCSA). We also agree with the current Great Burn recommended Wilderness outlined in the 2006 Forest Plan, but no additions to that recommendation. Lastly, we agree that polygon BMCW-01 and Sliderock would be acceptable recommendations. We strongly feel polygons WC 01 and 02 should not be considered; they have been actively managed within the last forty years and lack Wilderness character.

Our perspective on Wilderness characteristics is consistent with the original Wilderness Act of 1964. Therefore, when recommending wilderness areas, maintaining a buffer of at least a half mile to a mile from existing roads and no immediate adjacency to any private lands is very important to Wilderness character. For example, private landowners need to maintain their fence lines, which many times requires motorized equipment. Utilizing elevational boundaries or topographic features for boundaries on wilderness recommendations could be a useful tool.

When looking at large swaths of land as prospective Wilderness, there is a lack of consideration for conditions down the road. Forest health improvement to increase forest resilience to wildfire, insects and disease has been named a top priority by the federal and state government. Eliminating the opportunity to practice active management with preservation designations could have catastrophic consequences, which we are already seeing on the Lolo National Forest at a large scale. If your goal is to conserve resources, they desperately need management not neglect. Brown, dead forests are not characteristics of Wilderness and healthy ecosystems. These unintended consequences should be explained as part of the “desired future conditions” that has been named as the primary goal of this Forest Plan. It has been explicitly stated that this plan is intended to not box the National Forest managers in moving forward, and these preservation designations do just that.

After reviewing the preliminary Wild & Scenic inventory, we agree the Clark Fork section from Tamarack creek to St. Regis is an acceptable consideration. The other we believe a valuable consideration is Northfork Blackfoot TH to Headwaters. We adamantly disagree with the Clark Fork section from St. Regis to Slowway being considered for recommendation. The only other section with Wild & Scenic characteristics is Fish Creek within the Great Burn recommended Wilderness.

The Wild & Scenic Rivers Act was originally enacted in order to prevent dams and other construction from obstructing free flowing hydraulic systems. This is no longer a threat or concern moving forward as we enter a time in our country and society where we are removing dams, not putting them in. Secondly, we do not feel bodies of water without

“river” in the title should be considered for this designation. Lastly, making these designations is a waste of time and resources that are already stretched thin and unable to complete the current workload.

We would like to recommend Backcountry designations be considered in several areas rather than recommended Wilderness. Currently, Idaho has instituted Backcountry designations along the panhandle, and consistency in management across that border would be beneficial. We believe Ward Eagle and Cube Iron Cataract Inventoried Roadless Areas (IRA) would be valuable considerations for recommended Backcountry designation. Recommending a switch of Mount Bushnell – currently polygon 05 in the preliminary Wilderness inventory – from an IRA to a Restoration area could be beneficial in mitigating the rapid mortality from insects and disease in this incredibly manageable area. We would also like to see all acquired lands and all IRA’s remain in the suitable base. Most of the acquire lands were the result of significant public interaction that promoted the development of the term “working forest lands,” which would maintain their historic uses and benefits.

As a locally owned and operated sawmill, we appreciate the Forest Service Plan Revision Team’s consideration now and moving forward in this revision process. We appreciate the opportunity to comment on this process, and the utilization of our comments in the development of the Wilderness and Wild & Scenic inventory.

Please contact me with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Zoë Olivia Leake". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Zoë Olivia Leake  
Resource Forester  
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