

Data Submitted (UTC 11): 3/22/2024 7:32:43 PM

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Comments:

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March 22 , 2024

United States Forest Service

Lolo Forest Plan Revision Team

Attn: Amanda Milburn, Plan Revision Team Leader

RE: Preliminary need for change and proposed action

Amanda,

Pyramid Mountain Lumber, Inc. appreciates the opportunity to submit the following comments on the Lolo National Forest Plan Proposed Action. We are a family owned and operated sawmill nestled within the Lolo National Forest, operating continuously over the last 75 years in Seeley Lake. Forest products off the Lolo are an important aspect of sourcing for our sawmill, as well as an invaluable recreation hub for our community. As wildfire encroaches on Seeley Lake each year, our threat to life and property continues to rise, our insurance premiums continue to climb, and our way of life is pushed to the edge. The Proposed Action obviously aims to address the forest health crisis, however it lacks the conviction necessary for successful immediate response. A Forest Plan with strong intentions could prevent sales from lengthy litigation processes and increase the scale of sustainable management activities.

Pyramid believes in active management for the health of our forests. The ecosystems found within the Lolo evolved with the active management of indigenous peoples for millennia. Without this management, landscapes dependent on disturbance continue to wither into a state of disrepair. While all the Lolo is important to Pyramid, of course our backyard is always of greatest concern. We continue to stand behind Blackfoot Clearwater Stewardship Act (BCSA) and its recommendations for wilderness and other land designation. While Wilderness designation keeps land safe from future development, it does not lend itself to healthy ecosystems. Areas that can be actively managed (are physically suitable) should be allowed to remain within designation that allows for management should it become necessary to maintain or restore forest health.

The sustained yield as presented in the Proposed Action is a very reasonable figure. Recent performance by the Lolo staff tells us we will not come close to the sustained yield annually. Regardless of this number, the forest continues to outgrow our minimum yields since the 1986 plan. This continuous addition to forest stocking is what has created the wildfire crisis we face today. The continual allowance of forest to become overstocked - typically with a historical species composition - has degraded forest health and wildlife habitat. Without a significantly greater rate of sustainable active management designed to simulate historical natural disturbance patterns, we will continue to contribute to the problem rather than work towards a healthy future.

Providing a range for PTSQ rather than a conservative number provides flexibility for the timber program on the Lolo. If this number is not a target nor a limitation, there is no harm in

providing a higher number or range to avoid facing contention in the future. Despite PTSQ not being a cap on the timber program, other forests in Montana are currently facing ongoing lawsuits associated with sales that posted volume exceeding the PTSQ. Furthermore, the budget used to develop this number is entirely subject to change, and therefore should not be limited to current constraints but rather best-case scenario circumstances. As we see a rise in success of the Good Neighbor Authority (GNA), there could be a considerable increase in capacity in the coming years, as the GNA program has already greatly increased the rate of treatment. Lastly, with an understanding that salvage is not considered part of the PTSQ and makes up a large portion of the timber program, you are still working yourself into a box starting with a conservative number. The new planning rule is designed to eliminate the trivial tribulations of previous plans that inhibited progressive management. Producing conservative numbers for the timber program limits freedom for future management. Resigning to a small PTSQ with the assumption that salvage will continue to make up a large portion of the future timber program is evidence to resignation that the wildfire crisis is beyond our immediate control. The Forest Plan and our Proposed Action should be aimed at tackling forest management before salvage is a present need.

As Pyramid's future dives into a more clouded view, we urge the Forest Service to continue to prioritize infrastructure and local economies. Montana's existing manufacturing facilities are few and far between, and the loss of even one can throw large wrenches in the ability for the Forest Service to complete projects. Without the ability to market forest products, restoration and management activities turn into costly projects for taxpayers rather than potentially profitable enterprises. At Pyramid we value recreation, wildlife, local economies and most importantly forest health.

Please feel free to contact me with any questions or concerns. We appreciate your efforts on this project.

Sincerely,

Zoe Olivia Leake

Resource Forester

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