

December 13th, 2023



United States Forest Service
Swan Lake Ranger District
Attn: Chrstitopher Dowling (Rumbling Owl)
200 Ranger Station Road
Bigfork, MT 59911

Dear Christopher Dowling,

Pyramid Mountain Lumber, Inc. submits the following comments on the Rumbling Owl Fuels Reduction Project.

Pyramid Mountain Lumber (PML) is the oldest family owned and operated sawmill in Montana. The mill has operated in Seeley Lake, Montana 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. The notably degraded forest conditions within the proposed project area are in dire need of treatment, posing a significant risk to the wildlife and people that call this unique place home.

Condon is the epitome of the Wildland Urban Interface. Nestled in the lustrous Swan Valley, the people who call this place home share it with species such as Grizzly Bears, Canada Lynx, and Wolverines. Moose are as likely to be on your back porch as a wren. Elk may do all the mowing your grass will require. As you gaze at the forested mountains on either side of the only access in and out, Highway 83, you see a contiguous sea of dark green. The continuity our eyes have become accustomed to is not the historical stand structure – our forests used to be patchwork quilts of diverse, uneven age trees. This lack of diversity leaves them susceptible to insects, disease, and catastrophic wildfire. The mismanagement of Forest Service lands in the last 100 years has landed Condon in the 95th percentile of

communities at risk from wildfire in the United States. The goal of this project to employ strategic fuels management to “reduce wildfire impacts not only on homes and communities but also upon air quality, municipal watersheds, wildlife habitat, and other values at risk” is an immediate need. Therefore, asking for the Emergency Action Determination is entirely justified to “mitigate the harm to life and property adjacent to National Forest System land, remove hazardous fuels, and protect and restore water resources and infrastructure.”

Rumbling Owl project area encompasses one of the Areas of Elevated Risk and Degraded Forest Health identified in the Montana Forest Action Plan. The degraded forest conditions pose a significant threat to the critical habitat of several threatened and endangered species in the Swan. Without improving forest conditions through purposeful and strategic active management, thousands of acres of essential habitat could be entirely lost to stand replacing wildfire. Individual takes could be a second-hand effect of the negligence that led to such a fire. Forests that lack diversity and stray from historic species composition are not resilient – especially in the face of a rapidly changing climate. The project area is increasingly susceptible to insects and disease. With little to no large tree component, long-term forest health is bleak. Species composition needs to shift back to the historical balance of primarily Ponderosa pine, Western larch and White pine. White pine – which used to be a dominant species within the project area – now only represents a fraction of the trees found here. The project proposal has the potential to reset the balance of dominant tree species, create a mosaic of stand diversity, set the scene for prosperous old-growth development, and establish forests that are resilient in the face of disturbance.

Forest management also has a significant impact on local economies. The economic benefits resulting from forest management trickle through the system in more ways than just providing forest jobs such as equipment operators and foresters. Roads are improved, restaurants have paying customers, mechanics turn wrenches, trucks deliver logs, logs turn into boards, and those boards are used to build homes for families that can afford to feed their children. Pyramid alone employs over 100 people, most of which live in or near the project area. The project area attracts people from around the world every year who come

here to enjoy the splendor of these forests. Forest health is essential to protecting and improving the recreational opportunities that draw people here. Their contribution to the local economy is indispensable.

Timber harvest is not just about generating revenue and wood products. It is about managing for forest health and desired future conditions. It is about improving wildlife habitat. It is about ensuring safety to the communities that call these remote places home. Stewardship and sustainability does not always mean watching from the sidelines – we have been doing that for too long and are now paying the price. To be good stewards of the land today, we have to say, “enough is enough” and take action.

We appreciate the opportunity to comment on this project, and fully support use of the Emergency Action Determination authority to ensure this critical work can begin before it is too late.

Sincerely,

A handwritten signature in black ink, appearing to read "Zoë Leake". The signature is fluid and cursive, with the first name "Zoë" and last name "Leake" clearly distinguishable.

Zoë Olivia Leake

Resource Forester

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