



December 28, 2022

Via email: comments-bighorn@fs.fed.us

Thad Berrett
District Ranger
1415 Fort Street
Buffalo, WY 82834

Dear Thad,

This letter is on behalf of Sun Mountain Lumber. We would like to thank you for the opportunity to provide comments for the **Pole Creek Vegetation Management Project**.

Sun Mountain Lumber is a family owned sawmill that provides direct employment for approximately 200 milling and logging jobs in Deer Lodge, MT. In addition to the potential of this Pole Creek Vegetation Management Project providing raw material for our operations, we view these types of projects as creating a relationship in which our operations assist the Powder River Ranger District, Bighorn National Forest in achieving their goals and objectives on the ground.

We support the purpose and need of the Pole Creek Vegetation Management Project. Specifically, we support the proposed actions using various forest management practices to improve the health and productivity of forests, grasslands and watersheds, achieve a more balanced mix of forest habitat diversity, and reduce the risk of uncharacteristic wildfire effects.

We support the different management actions over the approximately 9,000 acres of proposed commercial treatment and applaud the recovery of economic value. Recovery of economic value ensures that you have robust infrastructure to help achieve goals AND should make it possible to treat more acres.

We support the fuel reduction management action over 5,400 acres of WUI and applaud the recovery of economic value. The more of these types of treatments that occur, the better the infrastructure becomes.

We support pre-commercial thinning over 2,000 acres. Science has shown that pre-commercial thinning in stands can significantly improve the health and growth of young stands and also reduce fire hazard.

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We support aspen stand enhancement efforts over 800 acres. Aspen stands are critical habitat for many species and conifer encroachment is putting these stands at risk.

We ARE concerned with the repeated statement that “*no commercial harvesting is proposed within inventoried roadless areas.*” While commercial harvest is prohibited in the 2001 Roadless Rule it does make exceptions. For example, the cutting, sale, or removal of generally small diameter trees which maintains or improves roadless characteristics and to maintain or restore ecosystem composition and structure, such as reducing the risk of uncharacteristic wildfire effects. There are likely treatment areas that fit into the purpose and need that happen to lie in the IRA. Especially treatments in WUI and aspen stands. We would like to see mechanical treatment options explored in IRA’s.

This project would have positive impacts on local and regional wood products facilities and other infrastructure. Additionally, project areas such as the Pole Creek Vegetation Management Project provide greater balance of ecological benefits and benefits to local infrastructure while achieving goals and objectives of the Infrastructure Investment and Jobs Act, Inflation Reduction Act and the Ten Year Wildfire Strategy.

Lastly, whenever possible please carefully consider timing of operation restrictions and allow flexibility for operators. LOP’s can often be counterproductive by extending time needed for operating and extending exposure to disturbance.

Thank you for the opportunity to comment and we look forward to more projects on the Bighorn Ranger District.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Sean Steinebach', with a stylized flourish at the end.

Sean Steinebach, Outreach Forester
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