



Lolo Forest Plan Revision Team
Lolo National Forest
26 Fort Missoula Road
Missoula, MT 59804

Subject: Lolo National Forest Land Management Plan Draft Proposed Action

Dear Amanda,

This letter is on behalf of Sun Mountain Lumber in Deer Lodge, MT. We would like to thank you for the opportunity to provide comments for the Lolo National Forest Land Management Plan Proposed Action.

Sun Mountain Lumber is a family-owned sawmill that provides direct employment for approximately 250 mill and logging jobs in Deer Lodge and Livingston, MT. We view the Lolo National Forest as central to all forest products infrastructure that remains in the State of Montana. The recent announcement of both Roseburg Forest Products and Pyramid Mountain Lumber closing is a stark reminder of the precarious state of Montana's forest products infrastructure. As we draft comments for the Lolo National Forest Plan revision, we are looking to promote active forest management. Our goal for the Lolo National Forest Plan is to ensure that the Forest is not inhibited by prescriptive language.

We appreciate being a part of the team that assists the Lolo National Forest in achieving their goals and objectives on NFS lands.

We would like to address several aspects of the proposed action that pertain to:

- Social and Economic and Integrated Multiple Use
- Wildland-urban Interface
- Old Growth
- Riparian
- Connectivity
- Backcountry MA 3
- Acquired Land Restoration Emphasis Area

We believe the proposed action should recognize a healthy forest products presence in maintaining or improving conditions on the Lolo National Forest. Additionally, we wish to emphasize the significance of maintaining current levels of suitable base for timber production and avoiding the loss of acres to restrictive land designations.

1. **Social, Economic and Integrated Multiple Use:** The proposed action should outline not only maintaining regional infrastructure but taking strides to encourage development of more biomass utilization. During the 2023 Lolo Forest Plan Revision assessment, we heard an emphasis on the provision of economic opportunities and support for rural communities. That emphasis included desires for management activities such as timber harvest to promote desired conditions. The proposed action outlines that timber harvest

Sun Mountain Lumber
PO Box 389, 181 Greenhouse Road, Deer Lodge, MT 59722
406-846-9460 fax: 406-846-1672



supports maintaining regional timber harvesting and processing infrastructure in both FW-TIM-DC and FW-TIM-GO. We believe the proposed action does not go far enough in maintaining regional timber harvesting and processing capacity. Vegetative management objectives (FW-VEGF-OBJ) state that treating a minimum of 20,000 acres of the LNF will maintain or move the forest toward ecological desired conditions. We are skeptical that this amount of treatment will move the needle on maintaining regional infrastructure or moving toward desired conditions. We estimate that commercial timber harvest of 44 MMBF annually across the forest would treat between 6,000-7,000 acres. This roughly equates to 8% of suitable and not suitable but allowable acres treated over the life of the plan. It simply does not go far enough to support affected rural communities and wood products infrastructure nor achieve goals or objectives on the ground.

Furthermore, we believe that the potential timber sale quantity would be better represented as a range versus a hard number. For instance, we would like to see PTSQ as a range of 44 mmbf to 80 mmbf. The reasoning behind this is the perception that the PTSQ is a limit on what can be sold annually. Having a range provides flexibility and reduces potential conflict for a sale program that may exceed 44 mmbf.

2. **Wildland-Urban Interface:** The proposed action, forestwide, sets two objectives for fuels treatment acres. The first objective (FW-FFW-OBJ-01) is *“to modify or maintain natural fire regimes on up to 220,000 acres in the first 10 years of the plan through vegetation management activities such as fuel breaks, thinning, prescribed fire, and weed treatment.”* And the second objective (FW-FFW-OBJ-02) is to perform *“hazardous fuel treatments within the WUI and around high-value resources representing a minimum of 45 percent of the total acres treated to achieve FW-FFW-OBJ-01, measured as an annual average on a decadal basis.”* This leads to treatment of approximately 9,900 WUI acres per year. The Lolo draft assessment estimated that there are 1,314,494 WUI acres associated with the LNF. We encourage the proposed action to be more aggressive with treatments in WUI. Proposed action should spatially align with CWPP’s and set an objective that stands on its own instead of a by-product of a different objective. At a rate of 9,900 acres treated per year, only 11% of the WUI acres would be treated over the 15-year lifespan of the Lolo Forest Plan. **We encourage the proposed action to reach an outcome that treats more than 11% of the acres in the 1,314,494 acres of WUI.**
3. **Old Growth:** Forest management and forest product utilization can contribute to the creation and maintenance of old-growth forests through various practices that promote forest resilience, biodiversity, and ecosystem health. As you well know, fire is the number one threat to mature and old growth forests. Number two is insects and disease. We believe that maintenance and promotion of MOG should be achieved through management efforts in accordance with Green et al.



4. **Grizzly Bear Plan Direction:** Mechanical treatments and forest product utilization can play a significant role in benefiting grizzly bears on the Lolo National Forest by enhancing habitat quality and promoting ecosystem health.

Mechanical treatments, such as thinning and prescribed burning, can help create a mosaic of vegetation types, including open meadows, young forests, and mature stands, which are essential for supporting diverse wildlife habitats. These treatments can mimic natural disturbances, like wildfires, which historically shaped the landscape and provided important foraging opportunities for grizzly bears.

5. **Riparian:** Forest management practices and wood products utilization can offer significant benefits in riparian areas on the Lolo National Forest, particularly when integrated with fuel reduction efforts. RMZ's are not "no management zones." The 2012 Planning Rule expresses the importance of maintaining, restoring and promoting riparian areas. Active management is an important component of working toward desired conditions (FW-RMZ-DC-03). We would like the revised forest plan to provide flexibility for management in riparian management zones. Active management can promote ecosystem health, improve water quality, and enhance habitat for both aquatic and terrestrial species.
6. **Connectivity:** The revised forest plan should reflect that active management does not negatively impact connectivity. In fact, forest management plays a crucial role in enhancing connectivity for threatened and endangered species such as the grizzly bear and Canada lynx by creating and maintaining corridors that facilitate movement and genetic exchange between populations.
7. **MA 3 Backcountry:** We are concerned by the creation of backcountry as a specific management area. This is due largely to the fact that the backcountry designation falls almost entirely on Inventoried Roadless Area. The 2001 Roadless Rule has yet to be codified by congress. In the Draft Assessment, the summary under 3.9.3 Inventoried Roadless Areas states "*The Roadless Rule prohibits activities that have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics, eliminates permanent road construction and reconstruction, thereby reducing fiscal demands and responsibilities, and reduces controversy over management of roadless areas.*" We believe that creating a backcountry management area on those IRA lands that already have protections outlined by 2001 Roadless Rule would have the opposite effect of reducing the controversy over management of roadless areas. In fact we believe that this designation will invite controversy if a critical need presents itself like we saw on the watersheds of Bozeman, Butte and Helena. We believe that MA 3 should shift from Backcountry to Inventoried Roadless Area and be managed in accordance with the IRA rules. The remaining 52,578 acres of Backcountry should be classified as general forest MA 4. **There is no need for**



additional designations on Inventoried Roadless Areas, it will only invite controversy.

8. **Acquired Lands:** We support the acquisition program of the Lolo National Forest. However, we disagree that the legacy lands described (ALR) in the proposed action have been deforested. The deforestation of land means that lands have been converted to other uses. We would offer that these acquired industrial lands have not been deforested (converted to other use) and we would like to see them remain in suitable timber base.

The Lolo National Forest Plan revision provides an opportunity to address critical issues related to social and economic conditions, fire management, and the preservation of suitable base for timber production. By integrating sustainable forest management practices, prioritizing effective fire management strategies, and considering the socioeconomic benefits derived from forest products, the revised plan can contribute to the long-term ecological resilience and economic vitality of the Lolo National Forest.

Thank you for considering our comments and suggestions. We look forward to further engagement and collaboration throughout this planning process.

Respectfully yours on behalf of Sun Mountain Lumber,

A handwritten signature in black ink, appearing to read "Sean Steinebach", written in a cursive style.

Sean Steinebach