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Re: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System, Draft Environmental Impact Statement #65356

Sun Mountain Lumber is a family-owned sawmill that provides direct employment for approximately 300 mill and logging jobs in Deer Lodge and Livingston, MT. Our facility, and the infrastructure that supports it, is integral to our Forest Service partners achieving their land management goals and objectives. In turn, Sun Mountain Lumber is very reliant on material generated from projects on federal lands.

We commend the administration for recognizing the critical role that federal forest lands play in sustaining ecological, social, and economic benefits throughout the nation. They significantly contribute to carbon storage, biodiversity enhancement, wildfire risk mitigation, climate resilience, cultural heritage, outdoor recreation, and local economic development.

While recognizing these contributions, we are writing to express our concerns regarding the Draft Environmental Impact Statement (DEIS) for the Old-Growth Amendment. We understand the importance of promoting, preserving and managing old-growth ecosystems; however, we are concerned that the proposed amendment will inhibit forest managers from addressing urgent forest health threats such as wildfire, insect infestations, and disease outbreaks. Furthermore, the amendment would impose unnecessary roadblocks to proactive management practices needed to maintain the health and resilience of our forests. We have been trying to add more and more policies, laws, regulations and acts to keep our forests safe. Meanwhile forest health, by all metrics, is going down. We blame this reduction in health on climate change while we clamp down on our ability to address the issues. We sit idle as good projects languish in court and lament the next record setting fire. This amendment will do nothing to promote old growth conditions, but it will provide food for lawyers to feast on in court.

In addition, the proposed amendment will have detrimental economic impacts on forest-dependent communities and forest products infrastructure. At a time when we are losing critical infrastructure at an alarming rate, we should not be looking for amendments that will further complicate efforts to restore and manage our forests sustainably.

Here are additional points of concern:

1. Impact on Addressing Wildfire Risk

The proposed old-growth amendment will limit the ability of forest managers to fully engage in commercial and non-commercial fuel reduction activities. Many old-growth forests are currently at high risk of catastrophic wildfire due to decades of fire suppression and the unnatural accumulation of hazardous fuels. While preserving old-growth characteristics is critical, the amendment must provide flexibility for managers to thin stands, reduce hazardous fuels, and conduct prescribed burns to reduce the risk of large-scale, destructive wildfires.

Wildfires not only threaten the very old-growth forests the amendment seeks to protect, but they also endanger human communities, wildlife habitat, and watersheds. The DEIS should more thoroughly consider how the amendment might exacerbate wildfire risk and offer clear strategies for mitigating those risks while still preserving old-growth characteristics.

2. Inhibiting Pest and Disease Management

Another significant concern is that the proposed amendment may restrict the ability of forest managers to respond swiftly and effectively to outbreaks of insects and disease. Insects such as bark beetles and diseases like root rot have devastated vast swaths of forests across the western U.S., including old-growth areas. Without the ability to implement active management, such as selective thinning or targeted treatments, the amendment risks allowing these threats to worsen unchecked, ultimately leading to the degradation or loss of old-growth ecosystems.

The DEIS should include specific provisions for managing forest health threats, especially in old-growth stands that are particularly vulnerable to insect infestations and diseases. By maintaining flexibility for proactive management, forest managers can help preserve the integrity of these ecosystems over the long term.

3. Unintended Barriers to Maintaining Forest Health

We are also concerned that the amendment could create additional regulatory barriers that would delay or prevent timely management actions needed to maintain overall forest health. The processes for fuel treatments, insect and disease management, and restoration projects are already complex. Adding additional layers of regulation specific to old-growth management could result in delays or increased costs that ultimately hinder necessary actions to protect forest ecosystems.

Given the urgency of addressing threats such as fire and pests, the DEIS should ensure that management flexibility is retained and that unnecessary roadblocks are avoided.

4. Economic Impacts on Forest-Dependent Communities

An additional and crucial concern is the negative economic impact this amendment will have on communities that rely on forests for their livelihoods. Many rural communities depend on responsible forest management for jobs, whether in timber production, recreation, or other forest-related industries. By imposing additional restrictions on forest management activities, the



amendment will limit opportunities for sustainable timber harvests, fuel reduction, and other management actions that contribute to local economies.

The DEIS does not adequately consider the economic implications for these communities, nor does it offer sufficient mitigation strategies to address potential job losses or declines in economic activity. Responsible forest management, which balances ecological benefits with economic needs, is essential for maintaining the social and economic well-being of these areas. Without flexible management options, forest-dependent communities face increased economic hardship, which, in turn, could undermine broader conservation goals.

5. Future implications and creating a Lightning Rod for litigation

By acknowledging and then not including the *mature* component of the amendment you will be drawing attention from litigants. Alternative 2 places emphasis on “*identifying and prioritizing areas of mature forest to be managed for future old growth forest.*” This language will undoubtedly hinder ANY future management until those undetermined acres are identified and prioritized.

Our next issues have to do with how the Draft Environmental Impact Statement (DEIS) for old-growth management might violate the 2012 Planning Rule. The 2012 Planning Rule guides forest planning for National Forest System lands and emphasizes sustainability, ecosystem integrity, and public involvement. Here are some potential ways this DEIS might violate this rule:

1. Ecological Integrity and Sustainability

The 2012 Planning Rule emphasizes maintaining or restoring the ecological integrity of ecosystems, including old-growth forests. If the DEIS proposes restrictions on management actions that could maintain, improve or create old-growth characteristics—such as large trees, diverse structures, and long-term forest health—it could violate the rule's requirement to protect ecosystems' resilience and ability to adapt to climate change.

2. Public Participation and Collaboration

The 2012 Planning Rule strongly emphasizes public participation and collaboration in the planning process. The DEIS was developed without sufficient public input or collaboration with stakeholders, including local communities, and conservation organizations. This amendment directly impacts ALL National Forests in our region and there was never targeted engagement at the local level. Collaborative groups, counties and communities were ignored to expedite the process, and we believe this violates procedural requirements of the rule.

3. Climate Change Consideration

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The 2012 Planning Rule calls for planning processes to consider and mitigate climate change impacts. Old-growth forests play a crucial role in carbon storage and climate mitigation. If the DEIS fails to adequately account for the role of old-growth in carbon sequestration by proposing regulations that inhibit manager's ability to reduce fuels and improve forest health it could conflict with the rule's requirement to address climate change.

In conclusion, we believe that this DEIS for the old growth amendment is an attempt to further reduce active forest management. It completely disregards the threat assessment outlining fire and insects and disease as the greatest threat to old growth (and mature) forests and will focus entirely on reducing harvest. Its inception likely violates the 2012 Planning Rule and has siphoned money away from an agency that is already struggling with budgets. We believe that this amendment would have no positive impact on maintaining, enhancing or promoting old growth and would further inhibit the agency's ability to perform fuel reduction and forest health improvement projects.

We hope to engage in constructive dialogue and collaborate with you to develop policies that strike a balance between conservation goals and proactive management practices, ensuring the long-term health, resilience, and sustainability of our federal forest lands.

Thank you for the opportunity to comment on the Old Growth Amendment. Please let us know if you have any questions or concerns.

Respectfully yours,

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

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