



January 16, 2025

Lolo National Forest
C/O Martin Jacob
24 Fort Missoula Road
Missoula, MT 59804

Dear Martin:

This letter is on behalf of Sun Mountain Lumber in Deer Lodge, MT. We would like to thank you for the opportunity to provide scoping comments for the **Lolo National Forest, Lolo Prescribed Fire Project**. 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. We view these projects as an opportunity to create a relationship to assist the Lolo National Forest in achieving their goals on NFS lands.

We are writing to provide comments and concerns regarding the proposed Lolo Prescribed Fire Project on the Lolo National Forest. As a concerned stakeholder, we appreciate the effort to address forest health and wildfire risks. We support the use of prescribed fire and understand the benefits. However, we believe certain aspects of your approach require reevaluation to enhance economic benefits, improve efficiency, and align with established directives.

1. Capitalizing on Commercial Opportunities:

It is crucial to reconsider the approach of mastication, thinning, cutting and burning merchantable-sized trees up to 12 inches DBH. Instead, we propose exploring opportunities to turn these trees into forest products. This approach not only sequesters carbon but also contributes to local economies. Additionally, commercial treatments on some acres may help offset costs and increase the number of acres that can be responsibly treated with fire. If you are truly going to provide yourself with an increase in flexibility and effectiveness you won't preclude the commercial/mechanical component.

2. Treatment Acreage and Cost Efficiency:

We applaud the proposed goal of treating 20,000-45,000 acres per year. It raises concerns about the efficiency and financial implications. Treating acres through mastication or by hand can be costly. So are the costs of prescribed fire. We would estimate on the very inexpensive end a cost of \$500.00/acre for mastication and/or hand treatment followed by burning. This would equate to \$10,000,000 over 20,000 acres and \$22,500,000.00 over 45,000 acres each year of implementation. Your Proposed Action over the 20-year projected lifespan would see costs of \$200,000,000.00 up to \$450,000,000.00. It is essential to explore more effective and cost-efficient strategies, such as commercial treatments where available, to accelerate the pace without compromising quality.

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3. Mechanical Treatment Options:

Mechanical treatment methods, such as commercial removal of sawlogs, post and rail and firewood, should coincide with thinning, mastication, piling, and chipping. These approaches not only contribute to fuel reduction goals but also offer economic opportunities to reduce cost per acre and increase pace and scale of treatment. It should be noted that creation of fuel breaks and rearrangement of fuels can easily be incorporated into mechanical treatments while generating commercial volume.

4. Alignment with Confronting the Wildfire Crisis:

The project should align with the direction set by "Confronting the Wildfire Crisis," emphasizing the expansion of markets and forest materials processing infrastructure. This alignment ensures a proactive and strategic approach to addressing wildfire risks.

5. Direction from Montana Forest Action Plan:

The project should align with the Montana Forest Action Plan, considering the potential for commercial components. Ignoring this aspect neglects an opportunity to reduce fuels and enhance forest health while supporting economic growth. MFAP suggests to *"actively support projects and programs that contribute to the retention of Montana's forest products industry in order to manage the expected increase in pace and scale of cross-boundary restoration projects."*

6. Reaching Mid-Point in Natural Range of Variability:

We are concerned that not treating all age and size classes may exacerbate mortality from prescribed fire and increase damage by attracting insects to fire-injured trees. Capping treatment at 12-inch trees may leave fuel densities such that the residual stands experience mortality and injury beyond desired outcomes. We see this as creating unnecessary difficulties in attaining natural range of variability.

We appreciate your attention to our comments. The word "commercial" is a magnet for negative responses, but ultimately the use of commercial where feasible can offset your costs and possibly increase the pace and scale of projects such as the Lolo Prescribed Fire. We look forward to further discussions that prioritize the comprehensive well-being of the Lolo National Forest.

Respectfully yours,



Sean Steinebach
Outreach Forester
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