



Sun Mountain Lumber

181 Greenhouse Road
Deer Lodge, MT 59722

October 6, 2025

Corey Lewellen, Forest Supervisor

Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, MT 59725

Re: Beaverhead-Deerlodge National Forest Canada Lynx Habitat Amendment

Dear Mr. Lewellen,

On behalf of Sun Mountain Lumber, I am writing to express our support during the objection period for the Beaverhead-Deerlodge National Forest's proposed Forest Plan Amendment updating the delineation of Canada lynx habitat and Lynx Analysis Unit (LAU) boundaries. We submitted a comment letter in March of 2025 and comments on the Draft EA in June of 2025.

The amendment, and specifically the adoption of Alternative 2, represents a necessary and scientifically sound refinement of lynx habitat identification. The Forest's analysis makes clear that the 2000-era mapping (Alternative 1) substantially overestimated lynx habitat by relying on outdated vegetation data and failing to incorporate snow depth, primary vs. secondary vegetation types, and adjacency factors critical to lynx ecology. By contrast, Alternative 2 integrates the best available science, including Olson et al. (2021), Holbrook et al. (2017), and the 3rd edition of the Lynx Conservation Assessment and Strategy, resulting in more accurate habitat and LAU delineations.

This accuracy matters for two reasons. First, it ensures that conservation standards under the Northern Rockies Lynx Management Direction are applied where they are most ecologically meaningful, rather than across large acreages of land unlikely to support lynx occupancy. Second, it provides greater clarity and predictability for land managers, local communities, and stakeholders engaged in active forest management, fuels reduction, and restoration. By refining habitat maps to reflect where lynx are most likely to occur, the Forest can focus protective measures appropriately while also maintaining opportunities for sustainable vegetation management in areas less relevant to lynx conservation.

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

It is also important to note that the Beaverhead-Deerlodge remains designated as secondary/peripheral lynx habitat. The Forest's analysis recognizes that while verified detections occurred in 2017–2020, lynx use of the Forest is sporadic, and reproduction has not been documented. The refinement in mapping therefore balances conservation commitments with realistic recognition of habitat conditions on this landscape.

Sun Mountain Lumber supports the proposed amendment as it is both scientifically justified and operationally practical. It improves habitat modeling, ensures compliance with the Endangered Species Act, and positions the Forest to make more effective, defensible project-level decisions in the future. We encourage the Forest Service to move forward with adoption of Alternative 2 and to finalize this amendment without delay.

Thank you for the opportunity to comment and we look forward to more projects.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Sean Steinebach', with a long horizontal flourish extending to the right.

Sean Steinebach
Outreach Forester
Sun Mountain Lumber
181 Greenhouse Road
Deer Lodge, MT 59722