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First name: Sean

Last name: Steinebach

Organization: Sun Mountain Lumber

Title:

Comments: SCC Comments

Great Job Revision Team!

Here are some comments concerning the SCC.

Thank you for the opportunity,

Sean

Sean Steinebach

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Lolo Forest Plan Revision Team

Lolo National Forest

26 Fort Missoula Road

Missoula, MT 59804

Subject: Lolo National Forest Potential Species of Conservation Concern

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 Potential Species of Conservation Concern.

Sun Mountain Lumber is a family-owned sawmill that provides direct employment for approximately 170 mill and logging jobs in Deer Lodge, MT. We view the Lolo National Forest as central to all infrastructure that remains in the State of Montana. We appreciate being a part of the team that assists the Lolo National Forest in achieving their goals and objectives on NFS lands.

We are commenting as an entity that could potentially be negatively affected by the listing of species of conservation concern as part of the forest plan revision process. I understand that the 2012 planning rule requires the identification of potential species of conservation concern during the assessment phase and the evaluation of existing information about these species relevant to the plan area (36 CFR219.6 (b)(5)). However, we have concerns regarding the potential impact of listing these species and the subsequent management actions that may be implemented.

We acknowledge the importance of protecting native species within the plan area, even if they are not recognized under the Endangered Species Act. However, it is essential to carefully consider the implications and potential consequences of listing species of conservation concern. We request that the Lolo National Forest thoroughly evaluate the scientific information and ensure that the listing process is based on accurate and comprehensive data.

While we appreciate the compilation of a master list of possible at-risk species known to occupy the plan area using Forest Service and Montana Natural Heritage Program data, we urge the Lolo National Forest to consider the potential limitations and uncertainties associated with these datasets. It is crucial to verify the accuracy and reliability of the information to avoid unnecessary restrictions or management measures that may negatively impact other forest uses.

Furthermore, we believe that the evaluation process for determining whether a species meets the criteria for listing as a species of conservation concern (as outlined in FSH 1909.12 Section 12.52) should be transparent and inclusive. It is essential to engage relevant stakeholders, including entities potentially affected by the listing, to ensure a balanced representation of perspectives and interests. Public involvement is vital to promote open dialogue, share local knowledge, and consider the potential socio-economic implications of the proposed listings.

Additionally, we encourage the Lolo National Forest to thoroughly assess the potential impact of listing the identified species of conservation concern on various forest uses, including but not limited to timber harvesting, recreational activities, and grazing. It is necessary to strike a balance between species conservation and the sustainable utilization of forest resources, ensuring that any management actions are based on a thorough understanding of the ecological dynamics and potential trade-offs.

Considering the potential listing of the identified species of conservation concern, including the Bighorn sheep, Fisher, Harlequin Duck, Idaho Giant Salamander, Western Pearlshell, Arctic Sweet Coltsfoot, Hiker's Gentian, Hollyleaf Clover, Howell's Gumweed, Idaho Barren Strawberry, Oregon Bluebells, Sandweed, and Scalepod, we request that the Lolo National Forest conducts a comprehensive assessment of the potential impacts on forest management and other forest users. This assessment should consider the economic, social, and environmental consequences to ensure a balanced approach to forest management.

We appreciate the opportunity to express our concerns and recommendations regarding the listing of species of conservation concern in the forest plan revision process. We trust that the Lolo National Forest will carefully consider these perspectives and strive to strike a balance between species conservation and the multiple uses of the forest resources.

We hope that our concerns will be taken into consideration, and we look forward to hearing your perspective on this issue.

Respectfully yours on behalf of Sun Mountain Lumber,

Sean Steinebach