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Title:

Comments: Attachment EO 14072 Comment 1 10 2024.pdf see below

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

To Whom It May Concern,

Sun Mountain Lumber is a family-owned sawmill that provides direct employment for approximately 200 mill and logging jobs in Deer Lodge, 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 National Forest 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. These lands, particularly mature and oldgrowth forests, serve as vital contributors to nature-based climate solutions. They significantly contribute to carbon storage, biodiversity enhancement, wildfire risk mitigation, climate resilience, cultural heritage, outdoor recreation, and local economic development.

However, our concerns stem from the findings in the threat analysis associated with this Executive Order. The analysis identifies wildfire as the primary threat to the conditions of mature and old-growth forests, followed closely by insects and disease. It also highlights that tree cutting is a relatively minor threat compared to climate-amplified disturbances such as wildfire, insects, and disease.

We are deeply concerned that this Executive Order, rather than facilitating effective mitigation against the threats posed by wildfire, insects, and disease, might create additional roadblocks to reducing forest fuels. Also, it may impede efforts to enhance forest health, particularly in stands most vulnerable to these disturbances. Moreover, we fear that this order might inadvertently facilitate litigation against projects aimed at fuel reduction and improving forest health.

The Executive Order has significant potential to impede the goals outlined in the Wildfire Crisis Strategy by increasing exposure to litigation. This could lead to delays or restrictions on crucial forest management activities necessary to mitigate wildfire risks, ultimately compromising the effectiveness of the strategy and endangering communities.

In addition, we would like you to consider the following:

1. Policy Approach and Local Engagement: We are apprehensive about amending 128 Land Management Plans via a single Environmental Impact Statement (EIS) in less than a year. We strongly advocate for a more localized, Plan-by-Plan Revision or Amendment approach, fostering robust local engagement and participation to ensure effective policy implementation.
2. Addressing Threats to Old Growth Forests: Recognizing wildfire and insect & disease mortality as primary threats to existing old-growth forests, we urge clear provisions enabling active forest management within and near these stands to safeguard against these threats.
3. Dynamic Nature and Regeneration of Forests: Emphasizing the dynamic nature of forests, we propose an

exception in the standards to facilitate old-growth forest regeneration for forest health objectives, pivotal for fostering resilient and healthy forest ecosystems.

4. **Effective Resource Allocation:** We express concerns about the amendment process diverting valuable resources from addressing actual risks, potentially impeding the Forest Service's Wildfire Crisis Strategy. Redirecting focus towards bureaucratic processes could hinder real progress.

5. **Complexity of Old Growth Recruitment Standards:** We discourage additional standards related to old growth recruitment, citing complexities in effectively analyzing these effects across 128 National Forests in a single EIS.

6. **Expanding Hazardous Fuels Reduction Goals:** Advocating for a broader approach, we propose expanding the exception for active management in old growth forests beyond Wildland-Urban Interfaces (WUIs) to cover the entire National Forest System (NFS), acknowledging the origins of most wildfires in backcountry areas.

7. **Focus on Science-Based Active Management:** We emphasize the necessity of a focused approach in the amendment process, prioritizing science-based, active forest management to address the wildfire crisis and foster forest health and resilience.

8. **Recognition of Climate Benefits:** Acknowledging the international recognition of climate benefits associated with forest management and sustainable wood products, we advocate for actively managing National Forest System lands to meet goals for reduced emissions and increased carbon storage.

In our view, a balanced approach is essential. We urge careful consideration to ensure that the Executive Order does not inadvertently hinder active forest management practices aimed at reducing wildfire risks and improving forest health. Encouraging sustainable projects should be a priority to safeguard our forests' resilience and address the imminent threats posed by climate-amplified disturbances.

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 Executive Order 14072. Please let us know if you have any questions or concerns