



VIA Email: comment-northern-kootenai-libby@fs.fed.us

December 13, 2018

Mandy Rockwell
Black Gold Project Leader
Libby Ranger District
Kootenai National Forest
12557 Highway 37
Libby, MT 59923

Dear Mandy:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Black Gold Salvage project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Kootenai National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Gold Hill Fire started on August 11, 2018 and continued into September, burning approximately 6,700 acres. During rehabilitation efforts, a small area of the fire that burned as part of the suppression effort was identified as having salvage potential. Proposed salvage would occur within stands dominated by lodgepole pine. The project area is located approximately 15 miles north of Libby, Montana in the Schafer Creek drainage.

The purpose and need for this project is to recover economic value of forest products in a timely manner to contribute to employment and income in local communities.

While AFRC supports this project, we offer the following comments for your consideration.

1. AFRC supports the salvage efforts included in this project but the salvage of timber is proposed on only 213 acres of the total 6,700 acres that burned within the Gold Hill Fire or (3 percent) of the acres are proposed for salvage. Further we applaud your use of the category 36 CFR 220.6(e)(13): Salvage of dead and/or dying trees not to exceed 250 acres, requiring no more than 1/2mile of temporary road construction. AFRC requests

the Forest take a second look at the burned area to see if more acres could be salvaged (up to the 250 acre limit) to make the project more economical and contribute to jobs and communities. These acres may come in the form of roadside salvage or additional heavily burned areas. While this project calls for the harvest of 1.7 mmbf, AFRC believes there may be more opportunity for harvest.

Currently, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,700 workers earning about \$335 million in compensation annually. The majority of the industry is centered in western Montana where the West Surprise project is located. Additionally, AFRC members are struggling to find needed raw materials to run their operations and keep employment levels at their current rate. With these factors in mind we encourage the Forest to look at doing a larger project footprint to generate more volume for the logging and sawmilling infrastructure, and to provide more funds to do the needed restoration work such as replanting.

2. The focus of the project is to salvage within stands dominated by lodgepole pine which were killed by fire, primarily contributing to a supply of post and pole materials for a local market. Some lodgepole products other than post and pole materials would also be removed. AFRC asks the Forest to consider more stands that might yield sawlog sized material for the as well. Sawlogs usually generate more revenue thus providing more funds for restoration.
3. While the project focuses on dead and dying lodgepole, AFRC asks the Forest to look closely at stands that have been burned, but trees appear to still be alive. What we have learned from the fires of 2017 that many of the areas were burned at the ground level with an intensity high enough to kill the roots of the trees even though the crowns were not burned. While the Forest is trying to leave these green trees for lynx habitat, they won't be effective if they eventually die. In your plan you state that *"the Forest has made assessments of lodgepole pine mortality in the field using guidelines that determine mortality by the amount of scorch and fire severity surrounding the roots and lower trunk."* Again, AFRC recommends the Forest take a second look as time progresses to see if more mortality occurs.
4. AFRC supports the Forest's plan to create openings larger than 40 acres with some units as large as 65 acres. To successfully remove the dead lodgepole and establish a new green healthy forest, areas larger than 40 acres must be treated.
5. AFRC believes the Forest has taken appropriate actions to not impact lynx or bull trout habitat. Proposed salvage would require temporary use of approximately 0.5 mile of stored National Forest System Road 4732. Approximately 0.1 mile may be reconstructed to facilitate a landing off the main road. The template for the remaining 0.4 mile would be used by machinery to access the units and skid logs to the landing.

6. AFRC suggests the Forest try using DXP for silvicultural work in this project. The species and prescriptions seem to lend themselves to this kind of timber marking regime and would keep pre-operational marking costs lower.

Thank you for the opportunity to provide comments on the Black Gold Salvage Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in black ink and is positioned below the word "Sincerely,".

Tom Partin
AFRC Consultant
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