



VIA Link: <https://www.fs.usda.gov/project/bitterroot/?project=64944>

October 23, 2023

Darby Ranger District
Attn: Lick Creek
P.O. Box 388
Darby, MT 59829

Dear Project Manager:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Lick Creek Demonstration Research Forest Project (Lick Creek).

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 Bitterroot 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.

This project is in the Lick Creek Demonstration/Research Forest and within the Como Lake area on the Darby Ranger District. The project area is south of Hamilton, MT, and north of Lake Como and proposes to implement several treatments as part of a long-term research project that examines how different silvicultural systems paired with and without prescribed burning can be used to restore and maintain ponderosa pine dominated forests that are resilient to wildfire, climate change, and insects.

AFRC visited the Project area in May 2022 while looking at the proposed Bitterroot Front Project and stopped at several points in the Lick Creek Demonstration Forest. Below are two pictures taken in that area:

The picture on the left shows some of the untreated stands in the area with Douglas-fir encroachment, while the picture on the right shows a thinned stand that has had prescribed fire treatments.



The Lick Creek Demonstration/Research Forest is a critically important long-term study of fuel hazard reduction treatments and forest resilience for ponderosa pine forests. AFRC supports the Purpose and Need for the Project which is to examine how three different silvicultural systems paired with and without prescribed burning can be used to restore and maintain ponderosa pine dominated forests that are resilient to wildfire, climate change, and insects. The three original treatments were set up in 1991 and the units have greatly increased in density over the 30 years since treatment, with dense Douglas-fir regeneration and ladder fuels developing (as in the left picture above).

Further, AFRC supports the three treatment regimens the District is proposing.

1. Commercial Thinning and Season of Burn Study (68 total acres; 60 treated acres, 8 untreated control acres): Natural ponderosa pine dominated stands with some Douglas-fir. The project would use improvement cuts and maintenance burning with low-intensity fire on an average interval of 10-15 years to maintain desired conditions.
2. Retention Shelterwood (69 total acres; 57 acres treated, 12 untreated control acres): Natural two-aged stands comprised of a mix of ponderosa pine and Douglas-fir that would be mechanically thinned, and broadcast burned with the goal to shift the forest to an uneven-aged forest structure dominated by ponderosa pine.
3. Selection Cut (23 total acres; 15 acres treated, 8 untreated control acres): Are natural multi-aged ponderosa pine dominated stands that would be mechanically thinned and broadcast prescribed burned. The first entry in 1992 established a new cohort and reduced Douglas-fir regeneration.

This is not a big Project, but it is important that it be implemented to obtain better information on which treatment strategies are most effective for managing ponderosa pine forests on the Bitterroot National Forest. Furthermore, the 160 acres of harvest will provide important sawlogs for the mills that depend on them.

Finally, AFRC supports the Forest using the expedited rules that state “Applied silvicultural assessment and research treatments carried out under Citation 16 U.S.C.6554(d) on not more than 1,000 acres for an assessment or treatment may be categorically excluded from documentation in an environmental impact statement and environmental assessment under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.).”

AFRC looks forward to this Project being implemented quickly to further its ongoing research elements.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239