



**490 North Meridian Road
Kalispell, MT 59901
(406) 752-5501
Ref: RS01-25
January 14, 2025**

**Kootenai National Forest
Libby Ranger District
12557 US Highway 37
Libby, MT 59923**

Re: Pine Phlats Fuel Reduction Project

Dear Mr. Gassmann,

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the Pine Phlats Fuel Reduction Project.

In reviewing the scoping document and proposed action, FWP largely supports this work to improve forest resilience and health by reducing fuel loads in stands adjacent to Libby through the treatment of 2,977 acres of vegetation. Identified within the scoping document, the purpose of this work is to reduce tree density and canopy layers to increase stand health and lower crown fire potential. Treatments will occur in areas utilized as winter range for ungulates. Maintaining patches of closed canopy forest cover are vital to wintering ungulates, providing snow intercept and thermal refuge during harsh winter months.

The scoping document identified two units, 23 (81 acres) and 706 (75 acres), as being greater than 40 acres in size that will be the subject of forest treatment. During periods of high snowpack, large openings reduce the ability and likelihood of animals utilizing the interior of these openings for winter refuge. FWP requests that the next stage of analysis define how much canopy cover consisting of mature trees will remain in other treatments. Winter range recommendations for white-tailed deer indicate canopy cover greater than 50% is required for both snow intercept and thermal cover.

FWP encourages reducing areas of open spaces through mixed treatment approaches (e.g. thinning instead of clearcut) and providing for a matrix of mature tree stands left behind as “reserve” patches throughout the project area. These patches allow for snow intercept while being adjacent to newly created forage areas from treatment.

Additionally, FWP supports the proposed road management plan as newly built roads will only be temporary during project implementation while preexisting roads will be maintained or reconstructed.

FWP encourages the development or adjustments of treatment plans that will reduce fire risk while promoting forest health and maintaining critical winter range within the proposed area. FWP staff looks forward to working with the Libby Ranger District of the Kootenai National Forest on this project and future projects.

If you have any questions, please feel free to contact Sam Martinez, FWP Area Wildlife Biologist, at (406) 293-4161, x 209.

Sincerely,

Dillon Tabish

Dillon Tabish
Acting Region 1 Supervisor
Montana Fish, Wildlife & Parks