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First name: Andy
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Organization: American Forest Resource Council; California Forestry Association
Title: Director of Forest Policy and Monitoring
Comments: Dear Mr. Gassmann:

American Forest Resource Council (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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Libby Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is pleased to see the Libby Ranger District proposing vegetation management treatments that will likely provide useful timber products to our membership. We are also pleased to see that the project has been approved as an authorized emergency action under Section 40807 of the Infrastructure Investment and Jobs Act (IIJA). The treatments proposed are primarily designed to improve resiliency to disturbance, including high severity wildfire. The level of risk of high severity wildfire has risen to the point where activities to mitigate the risk should be viewed as an emergency. We support any actions to expedite the analysis and implementation of such treatments.

It is refreshing to see that the EA includes the provision of wood products among the project[rsquo]s purpose and needs. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. Technical reports from both 20101 and 20122 completed for the Forest Service determined, among other things, that:

[bull] The forest products sector helps sustain the social, economic, and ecological benefits of forestry in the United States.

[bull] Product revenues sustain economic benefits that include jobs and income.

[bull] Ecological and social benefits can be supported by timber revenue to landowners that help keep land in forests and by forest treatments that can help maintain ecological functions.

[bull] Wood products fulfill fundamental needs per capita and have remained competitive with alternate means of meeting those needs.

[bull] US lumber production and demand is expected to increase through 2040.

The variety of proposed treatments in the EA are an important component of delivering these timber products today and in the future. Intermediate treatments such as commercial thinning and improvement cuts coupled with regeneration treatments such as shelterwood, seed tree, and clearcut with reserves are integral to a sustainable supply of timber. We appreciate the inclusion of the full spectrum of silvicultural treatments and encourage the Libby Ranger District to implement them as described in the proposed action.

We support the District[rsquo]s request to create openings greater than 40 acres in size. This cookie cutter restriction exists on most Land Management Plans that AFRC has reviewed. We[rsquo]re unclear why 40-acres

has been determined to be the agencywide standard on forest openings, nor are we clear on what the scientific justification is for this particular level. Regardless, we support site specific prescriptions and unit layout determined by local Forest Service staff, even when it conflicts with arbitrary Management Plan standards.

AFRC believes that a well-maintained road network is a critical component of active forest management and wildfire suppression. We are pleased to see the Libby Ranger District propose road construction to access the proposed treatment units with conventional logging systems. We also understand that the Forest Service must consider road closures on certain roads. We are pleased to see that the project is prioritizing road storage over road decommissioning to address closure needs. Stored roads can be placed in a condition that permits adequate drainage to protect key resources while also facilitating reopening when needed. Conversely, decommissioning typically equates to a road being removed from the landscape permanently.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. We appreciate the inclusion of tethered-assist equipment in the EA.