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# RY TIMBER, INC.

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**Custer Gallatin National Forest Proposed Plan Alternative "E"**

Comments

RY Timber, Inc.

5/30/19

Out of a total of 3,039,273 acres of land, the Proposed Forest Plan Revision Alternative "E" would classify a mere 604,502 acres as suitable for timber production, a slight increase from last years' draft. Acres Suitable for Timber Management under this alternative only represents 19.89% of the total land base. Though RY timber supports Alternative "E" we remain disappointed that the PTSQ (Projected Timber Sale Quantity) is but a fraction of what the 19.89% of suitable timberlands can biologically sustain. Alternative "E" still does not provide enough timber volume to support the local industry. A new alternative should have been created and analyzed that would add more acres to the suitable timber base.


Assuming no further changes to the classified Timber producing acres established in the Preferred Alternative, the PTSQ of 24.5 mmbf annually fails to capture the productivity these lands are capable of. Not managing these lands to their fullest potential will increase the time it takes to restore forest health and reduce the risk from catastrophic fires. RY Timber requests that the Forest Plan implements a more aggressive PTSQ than 24.5 mmbf/yr. Not only would an increased annual harvest restore the forest health more quickly, it would also provide much needed logs for the local industry. Our Livingston mill alone is capable of cutting 35 mmbf of logs each year. Anything less than the 30mmbf per year would jeopardize our mill's future.

Based on the Forest Service's minimum annual net growth per acre of 20 CF/ac/year, these Classified Timber Production Acres are capable of yielding 60.45 mmbf\*\* every year. Implementing an average harvest of 35-40 mmbf/year using scientific silvicultural practices, it is reasonable to assume that growth per acre and future potential yields should improve over the course of the next rotation.

Our company feels that the average annual harvest established in Alternative "E" of the Proposed Plan relies too much on anticipated budgets and organizational capacity. Reliance on budgeting hampers future management opportunities.

The objective for suitable timber acres should be to harvest the annual growth and mortality. Under the Alternative "E" the proposed annual harvest falls short. At the proposed level the Forest will never get caught up on the back log of over mature decadent timber stands that need both silvicultural treatments and fire mitigation. The Final Forest Plan needs to recognize this fact and be more aggressive managing both its suitable and the non-suitable timberlands. Biological Potential, not budgets, should guide your timber management plans. The figures I cite in these comments relate only to the management of 19.89% of the land base. The remaining 80.11 of the land will continue to be off limits and available for other uses besides vegetation management.

Edward W. Regan

  
Resource Manager

RY Timber, Inc.

\*\* (20 cf/ac/yr is approximately 100 bf/ac/yr.; 690,502 acres X 100bf/ac/yr = 60.45 mmbf annually)