

**DEPARTMENT OF NATURAL RESOURCES  
AND CONSERVATION**  
**Forestry Division**



STEVE BULLOCK, GOVERNOR

**STATE OF MONTANA**

PHONE: (406) 542-4300  
FAX: (406) 542-4217

2705 SPURGIN ROAD  
MISSOULA, MONTANA 59804

Mary C. Erickson  
Custer Gallatin Forest Supervisor  
Custer Gallatin National Forest  
10 East Babcock Ave.  
PO Box 130  
Bozeman, MT 59715

Re: Montana Department of Natural Resources and Conservation, Trust Land Management and Forestry Division comments to the Custer Gallatin National Forest's Draft Revised Forest Plan

Dear Ms. Erickson,

Thank you for the opportunity to comment on the Custer Gallatin National Forest's Revised Forest Plan. We appreciate the Forest's efforts to engage state and local governments and Montana citizens throughout the planning process. The Montana Department of Natural Resources and Conservation (DNRC) Trust Lands Management and Forestry Divisions are committed to continuing a positive working relationship with the Forest, specifically on wildfire response, community protection, resilient landscapes, sustainable forest management, and access. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions and the citizens of Montana.

The DNRC's Trust Land Management Division (TLMD) manages approximately 5.2 million surface acres and 6.2 million subsurface acres across the State of Montana. The mission of TLMD is to manage state trust timber, surface and mineral resources for the benefit of common schools and other endowed institutions under the direction of the Board of Land Commissioners, comprised of the top five elected officials of the state. The TLMD is divided into the following four programs: agriculture and grazing management, forest management, minerals management and real estate management. These programs generated over \$ 87 million in 2018 for the trust beneficiaries.

The DNRC's Forestry Division is responsible for planning and implementing forestry and fire protection programs through an extensive network of staff located in field offices across the state. The Forestry Division is divided into the following three programs: fire protection, forestry assistance, and business management. Our programs work to maintain and improve the health of Montana's forests, watersheds and the communities that depend on them while providing resources, leadership and coordination to Montana's wildfire services and landowners.

The following comments are submitted in support of these respective missions and reflect DNRC's goal of enhancing the social and economic well-being of our communities, while maintaining and improving desired ecological conditions on the ground.

#### Road Infrastructure and Access:

DNRC recognizes road management as one of the greatest challenges for land managers. While we recognize the budget and resource constraints to maintaining the road system, access is essential to trust land management, wildfire protection, forest restoration, and other stewardship needs.

- Administrative access should be maintained in areas that are important for future state trust land management and to ensure safe and effective wildland fire response to protect values at risk.
- The Forest should continue to provide reasonable access to state trust lands as guaranteed under the Alaska National Interest Lands Conservation Act (Public Law 96-487, 94 Stat. 2371 (1980)).
- The Forest should continue to make partnering with DNRC a high priority to acquire permanent access under the Master Cost-Share Agreement or the Easement Exchange process.
- When fulfilling Section 7 Consultation requirements under the Endangered Species Act (ESA) for DNRC access projects, please be advised that TLMD has developed a Habitat Conservation Plan (HCP) and acquired an Incidental Take Permit (Permit) under Section 10 of the ESA for 550,000 acres in western Montana. The HCP and Permit cover forest management activities (including road maintenance, road construction, road reconstruction and installation of bridges and culverts) where they may affect bull trout, grizzly bear, Canada lynx, westlope cutthroat trout and Columbia redband trout. The Permit has a term of 50 years, expiring in 2062. DNRC requests the Custer Gallatin take these documents into account to effectively streamline Section 7 Consultation for all road agreements.
- DNRC supports maintaining road infrastructure and access for wildfire protection particularly within, and adjacent to, the Wildland Urban Interface (WUI) and adjacent to DNRC's fire protection. Maintaining road access is critical for treating fuels, managing vegetation for forest health and resiliency, and managing fires before they reach nearby private lands and lands under DNRC's fire protection. Maintaining access is also important for reducing risk to firefighters and increasing the chance for successful initial attack.

#### Community Protection and Landscape Resiliency

- To more effectively protect communities and increase landscape resiliency, the acres of vegetation treatments should be increased and priorities for treatment should be clearly identified. Wildland Urban Interfaces and municipal watersheds should be identified as the highest priorities for active vegetation management. The projected increase in size, severity, intensity, and frequency of wildfire, along with the expanding development in the WUI, points to the need for an increase in active management, particularly within and near the WUI. Further opening dense stands and adding variation on the landscape will provide greater

resilience to drought stress, fires, and insect and disease outbreaks as the climate changes further in the years ahead.

- The community wildfire protection plans show there are over 1.6 million acres in the Wildland Urban Interface (WUI), which is 52.7% of the Forest's lands. Consider prioritizing treatments on those acres followed by periodic maintenance to protect values within the WUI.
- The ability to suppress a wildfire at private land boundaries is compromised when there are dense stands and high fuel accumulations on adjacent national forest lands. The plan should ensure that land management designations adjacent to and near private land allow for active vegetation management and fire suppression.
- Consistent with the terms of the Montana Cooperative Wildland Fire Management and Stafford Act Response Agreement, DNRC will consider Forest Service wildland fire response when deciding whether to participate in cost share agreements for fires which have burned onto lands under DNRC or local government jurisdiction. We believe you should acknowledge this issue as it pertains to areas where full-suppression may not be implemented.

#### Forest Restoration Outputs and Timber Industry

The Montana Forests in Focus 2.0 Initiative emphasizes forest restoration and industry retention as key objectives. One of the best ways to offset the high costs of forest restoration is through projects that produce wood products with commercial value. This, of course, depends on having a skilled workforce and purchasers of raw materials. The state's remaining logging industry and milling infrastructure are critical partners in meeting the ecological, social and economic components outlined in the alternatives.

- With 553,000-665,000 acres of suitable land base we feel there are more opportunities to use active management to achieve desired future conditions and fire resiliency. Currently, alternatives range from 5,000 to 8,000 of total vegetation treatments per year, or about 1 % of the suitable land base. The Projected Timber Sale Quantity with alternatives currently ranges from 6 to 15 million board feet, about 16 to 39 percent of the Sustained Yield Limit. Revenue from the timber outputs can help cover the cost of other restoration work such as habitat and watershed improvement as well as recreation enhancement. Vegetation restoration and fuels reduction projects also provide jobs for local communities and industries and revenue for counties. It appears that the number of acres planned for vegetation treatment is being constrained by budgets and capacity. DNRC and all seven national forests within Montana are currently working together to identify and carry out a program of work under Good Neighbor Authority (GNA). Through GNA, Montana DNRC can add capacity to the Custer Gallatin to accomplish more forest management and restoration on the National Forest. DNRC encourages the Custer Gallatin to account for this additional capacity as well as other opportunities when identifying total acres treated and volume outputs per year.

We encourage adding more acres of vegetation management in at least one alternative to disclose the benefits and effects of more active management.

- The projected timber volume harvested should be compared to the mill supply need and operator capacity. The potential loss of timber industry infrastructure and resultant inability to achieve the desired future forest condition identified in the Proposed Action should be examined in the environmental analysis.

- The discussion of local economic benefits with restoration and timber outputs would be strengthened by including an analysis of projected payments to counties with each alternative. We encourage disclosing how revenues from management actions will contribute to economic stability or growth in counties.

#### Partnerships, Collaboration, Capacity & Efficiency

Partnerships and coordination are integral in an all lands approach to forest management, community protection and watershed restoration. We encourage the Forest to identify how authorities and programs such as Shared Stewardship, Good Neighbor Authority, Stewardship Contracting, Environmental Assessment and Decision Making, and Forest Products Modernization will be used, and what the effects could be on the pace and scale of restoration and output.

In summary, DNRC strongly encourages you to develop a Plan that achieves the National Cohesive Wildland Fire Management Strategy goals of resilient landscapes, fire-adapted communities, and effective wildfire response. To achieve these goals, we recommend you increase the level of vegetation and fuels treatments and we encourage further engagement with agencies and partners in a shared stewardship approach.

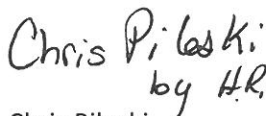
Thank you for considering our comments. We appreciate your work on the revised plan, weighing the many interests involved and utilizing the best available science in plan development. We look forward to continuing to work alongside the Custer Gallatin for the benefit of Montana's communities, forests, wildlife and watersheds.

Sincerely,



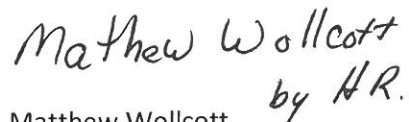
Hoyt Richards

CLO Area Manager



Chris Pileski

ELO Area Manager



Matthew Wollcott

SLO Area Manager

CC: CLO, ELO, SLO  
FD Division  
Sonya Germann