



## MINERAL COUNTY BOARD OF COMMISSIONERS

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August 1, 2022

Bitterroot National Forest  
Attn: Forest Plan Amendment  
1801 N. 1st Street  
Hamilton, MT 59840

Dear Amendment Planner:

The Mineral County Commissioners would like to thank you for the opportunity to comment on the proposed Programmatic Forest Plan Amendments on the Bitterroot NF that include Elk Habitat Objectives (scoped in 2019), Old Growth, Coarse Woody Debris, and Snags.

With a desire to see the timely implementation of active forest restoration work that improves forest health, reduces wildfire risk, and contributes to local economies in our rural timber-dependent communities, we regularly engage in project development across many of our western Montana Forests. We do this collaboratively with the Mineral County Resource Coalition and the forest products industry. All too often, after we have spent many hours in meetings and ground truthing proposed activities, these projects are delayed, not because of project design or scope, but because anti-forestry groups can point to problematic language in Forest Plans or NEPA documents that do not fully utilize current relevant science or that contain contradictory direction. We support these amendments that we hope will address some of these issues and reduce opportunities for objections and allow timely implementation of projects.

### Old Growth

Our forests, including old growth, are dynamic and do not stay in a static state, constantly moving from one successional state to another. Due to the dynamic nature of this stand progression, we believe the stand structure and composition should be redefined at the project level. The criteria established in the current plan for identifying old growth were developed for the Cascade Mountains Douglas-fir forest type which is not representative of conditions found on the Bitterroot NF. Many of the attributes in this definition cannot be accurately measured in the field and are not part of the standard data collection, so they cannot be assessed to determine if forest plan objectives are being achieved. Old growth can not be delineated at the stand level during project area planning under the criteria used in the existing plan.

Green et al. (2011) on the other hand, provide measurable criteria for designating old-growth based on forest types and habitat types in Montana and Idaho and it provides quantitative and qualitative criteria that are measured in the field by the National Forest Inventory and Analysis (FIA) data collection program and site-specific stand exams and walk-through exams. Old growth could be delineated at the stand level based on the forest composition and structure as defined in Green et al. (2011) during project area planning. Our collaborative has been actively involved in project planning with other forests in Region 1 that have already amended their Forest Plan to implement Green et al. (2011) and have participated in the re-characterization of stands as they move from one forest or habitat type to another utilizing the new standard. We strongly recommend that the Bitterroot Forest Plan be amended to replace the current forest-wide standard for identifying old growth with Green et al. (2011). This amendment will align the Bitterroot Plan with the definition used in Region 1 and what is being used for the National Inventory effort (FIA). Stand conditions are not static and Green et al. (2011) will provide the opportunity to redefine stands at the project level as they move through their

successional stages. Green et al. (2011) provide the best current relevant science for identifying and inventorying old-growth.

### Coarse Woody Debris

Similar to the existing old growth standards in the current forest plan, coarse woody debris standards in the 1987 Forest Plan do not represent the most current and relevant science available. As indicated in the scoping document, new current relevant science is available that provides more refined measures to guide project implementation to contribute to achieving Forest Plan goals and objectives. Current management area direction for coarse woody debris retention does not recognize the differences in the natural variation of coarse woody debris among different forest and habitat types, as supported by the best available scientific information. We support the proposed amendment that would utilize the newest current relevant science to guide project implantation with coarse woody debris. Additionally, we support an amendment that would resolve the contradictory direction within the existing standards in Management Areas 1, 2, 3a, 3b, and 3c. This new information will provide more refined measures to guide project implementation to accomplish Forest Plan Goals and Objectives with coarse woody debris.

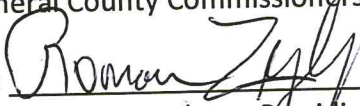
### Snags

We support the need to amend the forest-wide plan wildlife standard for snags to resolve the contradictory direction providing sufficient snag habitat for wildlife while also allowing for the removal of excess snags where necessary to address fuel loading or to **safely** meet restoration objectives through sanitation treatments, salvage, and reforestation.

Again, thank you for addressing these planning issues that we hope will allow projects to proceed through the NEPA and implementation period in a timelier manner.

Respectfully

Sincerely,  
Mineral County Commissioners

By:   
Roman Zylawy, Presiding Officer

By:   
Laurie Johnston, Commissioner

By:   
Duane Simons, Commissioner