August 8, 2022

Matt Anderson, Forest Supervisor

Bitterroot National Forest

1801 N. 1st Street

Hamilton, MT 59840

Re: Comments on Proposed Bitterroot Forest Plan Amendment Proposal

Dear Mr. Anderson,

Thank you for the opportunity to comment on the proposed Bitterroot Forest Plan Amendment addressing old growth, course woody debris, and snag components. There is new science with these components that needs to be incorporated into Forest Plan direction. Updating the direction for these components will greatly benefit management of the national forest and surrounding lands.

The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands within and near the boundaries of the Bitterroot National Forest. Our agencies share the common goals of reducing fire risk and improving forest health in Montana’s forest landscapes. DNRC has strong interest in the changes proposed to these Forest Plan components. Management of the national forest lands affect conditions and outcomes on nearby state and private lands. Also, DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing restoration projects on the Bitterroot National Forest. The proposed changes will be incorporated into projects DNRC prepares and administers through GNA.

Regarding the Old Growth component, DNRC supports modifying the forest-wide standards and glossary definitions to those described in Green et al (2011). The current components are based on information from Franklin’s work in the Cascade Mountains’ Douglas-fir forest type back in 1981. The current components do not adequately address the varying habitat types and conditions on the Bitterroot National Forest. The habitat types, species, and age-size relationships in the Northern Rockies vary greatly from those in the Cascade Mountains. Also, many of the attributes in the current components cannot be accurately measured in the field.

With Green el al, the Northern Region has developed ecological descriptions of old growth by specific forest types. Green et al is widely recognized as the best available science for assessing old growth in the Northern Rockies. This proposal to modify Forest Plan direction to incorporate Green et al also aligns with direction in Executive Order 14072, which calls for consistent and reliable identification and inventory of old growth.

Regarding the Course Woody Debris component, DNRC supports updating the direction in the 1987 Plan to incorporate the latest science and resolve contradictory direction. Several publications released since the 1987 Forest Plan (mentioned in the proposed action) provide much stronger basis for guiding project implementation. Additionally, Management Area 2 includes contradictory standards for retention of course woody debris. The latest science recognizes differences in natural variation of course woody debris among forest and habitat types and the Forest Plan component should be modified to reflect this.

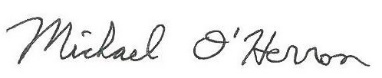
Regarding the Standing Dead component, DNRC supports updating the direction in the 1987 Plan to resolve the contradictory language for wildlife habitat and allow for removal of excess snags where necessary to reduce fuel loading or to meet objectives for restoration, salvage, and reforestation.

With regard to all three components, monitoring and evaluation will be important to assess how effective the new components are in meeting goals of the Forest Plan and the Montana Forest Action Plan. Post-treatment surveys and periodic reviews should be used determine if the desired stand characteristics have been retained. If monitoring trends show declines in stand and habitat characteristics these components will need to be reviewed for adjustment.

DNRC is committed to continuing our positive working relationship with the Bitterroot National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By continuing to work together, we can more effectively work towards an “all lands” approach to forest and watershed management and restoration, benefiting both agencies’ missions.

Thank you for the opportunity to submit our comments.

Sincerely,



Mike O’Herron

Area Manager, Southwestern Land Office

Montana Department of Natural Resources and Conservation

Cc: Thayer Jacques, Unit Forester; Stephen Kimball, Local Government Forest Advisor