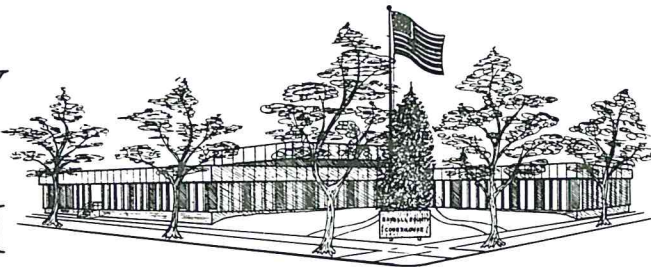


# COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS  
215 S. 4<sup>th</sup> Street, Suite A  
Hamilton, MT. 59840  
406-375-6500  
[commissioners@rc.mt.gov](mailto:commissioners@rc.mt.gov)

August 9th, 2022

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

## **RE: Forest Plan Amendment Comment**

Dear Matt,

The Board of Ravalli County Commissioners (BCC) would like to thank you and the Forest Service project team for your collaborative efforts during this amendment process for the Bitterroot Forest Land Resource Management Plan (Forest Plan). We look forward to working with you on the development and implementation of the amendments.

The Ravalli County Commissioners fully support the following Forest Plan amendments:

- 1) Old Growth
- 2) Coarse Woody Debris (CWD)
- 3) Snags

Ravalli County supports the proposed “programmatic” plan amendments. The current Forest Plan criteria and requirements for Old Growth, CWD and Snags are outdated and not based on the best available science. These amendments will resolve problematic language regarding snags and CWD and improve old growth forest stands.

### **Old Growth**

Ravalli County supports the use of Green et. al for consistently and reliably identifying old growth acres. While we recognize all the benefits old growth stands, we also recognize that

these stands are dynamic and are subject to insects, disease, mortality and wildfire and must be managed to ensure resiliency and sustainability of our old growth stands.

### **Coarse Woody Debris (CWD)**

Ravalli County supports amending CWD requirements from the 1987 Forest Plan as it does not recognize the differences in natural variation of CWD among different forest types and habitats. The requirements for CWD in the 1987 Forest Plan is inconsistent with site-specific needs and scientific data for soil productivity, habitat and fire fuels.

### **Snags**

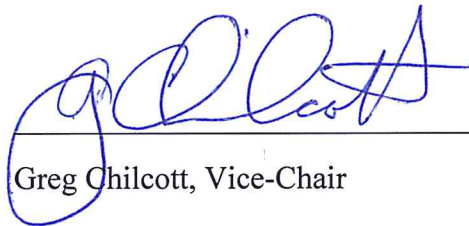
The 1987 Forest Plan requires that "All snags that do not present an unacceptable safety risk will be retained". Ravalli County supports providing sufficient snags for wildlife habitat while also allowing for the removal of excess snags where necessary to address public safety and catastrophic wildfire mitigation.

Sincerely,

Ravalli County Board of Commissioners

A handwritten signature in blue ink, appearing to read "Dan Huls", written over a horizontal line.

Dan Huls, Chairman

A handwritten signature in blue ink, appearing to read "Greg Chilcott", written over a horizontal line.

Greg Chilcott, Vice-Chair

A handwritten signature in blue ink, appearing to read "Jeff Burrows", written over a horizontal line.

Jeff Burrows, Member