

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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Custer-Gallatin National Forest
Attn: South Plateau Landscape Area Treatment Project
PO Box 520
West Yellowstone, MT 59758.

Dear Project Planner:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the South Plateau Landscape Area Treatment Project. DNRC previously provided comments on the Draft EA on September 16, 2020.

The 39,900 acre project area is located south and west of West Yellowstone in Gallatin County. The project area contains about 1,169 acres of private land, 20,240 acres of Wildland Urban Interface, 14,381 acres of municipal watershed, clusters of homes, transmission sites, and other values. It's an area with risk of significant impacts from uncharacteristic insect and disease and wildfire disturbances.

The Department of Natural Resources and Conservation (DNRC) has fire protection interests in this area and manages the State Trust Lands. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana. DNRC views the South Plateau project as important work to be completed over the next 15 years to achieve our shared goals for improving forest health and reducing fire risk across these landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.

DNRC supports the purpose and need for the project which includes improving forest health and resiliency to insect and disease infestations and uncharacteristic wildfire and providing wood products for local mills. Timber removed to increase forest health and resiliency will contribute to the economic stability of local communities and help retain operators and manufacturers for future restoration.

DNRC supports the 16,462 acres of vegetation treatments proposed. The planning area is composed mostly of dense lodgepole pine stands that are overstocked and vulnerable to uncharacteristic insect and disease outbreaks and wildfires. The proposed treatments would break up the dense continuous lodgepole pine stands and move the vegetation composition and structure towards historic conditions. The proposed treatments would also improve forest health and resiliency, improve fire fighter and public safety, and protect values from wildfire impacts.

The proposed Decision Making and Implementation process will allow for more detailed planning in implementation and provide flexibility to adjust treatments to changes in conditions in this dynamic landscape. We urge you to coordinate implementation with DNRC and other landowners in the area. Working together we can more effectively align implementation of treatments across boundaries. DNRC has programs to assist private landowners with treatments on their lands. Also consider the use the Good Neighbor Authority (GNA) which will retain timber revenue to help fund additional restoration projects.

DNRC and other agencies and partners share a strong concern about potential impacts of large, stand replacing wildfires to communities, public and firefighter safety, habitats, watersheds and municipal water, and carbon storage if no action were taken. The final decision provides an opportunity to emphasize the severity of the risk and consequences of taking no action in this area.

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



Hoyt Richards

Area Manager, Central Lands Office

cc: Stephen Kimball, Local Government Forest Advisor