

Ravalli County Collaborative

Ravalli County Montana

215 S. 4TH STREET SUITE A
HAMILTON, MT 59840

February 16, 2023

Kimberly Smolt, Project Manager
Bitterroot National Forest
1801 N. 1st Street, Hamilton, MT 59840

Ref: **Programmatic Amendment for Elk Habitat, Old Growth, Snags and Coarse Woody Debris 2023**

Dear Kimberly,

Thank you for engaging with the Ravalli County Collaborative (RCC) on the proposed amendment to the 1987 Bitterroot National Forest (BNF) Plan relative to elk habitat, old growth, snags, and coarse woody debris. The RCC believes that these are very important management issues and desires to fully engage with the BNF on the development of this amendment.

The RCC provided a comment letter to the BNF on the Bitterroot Forest Plan Amendment proposed in July 2022. A copy of that letter is attached here for reference.

The 2023 proposed amendment is likely to have very significant impact on the human environment because it would constitute new direction, goals, objectives, standards, and guidelines for the entire Bitterroot National Forest. Furthermore, this amendment may some day become a building block toward a revision of the 1987 BNF Plan. Therefore, it is incumbent on the RCC to make a thorough review of the proposed amendment so that we may help the BNF build the best products possible.

As the entire RCC typically meets only once a month, the 30 day comment period is difficult for the RCC to provide detailed comment. It is our intent to provide the BNF with comments specific to all four components of the amendment: elk habitat, old growth, snags, and coarse woody debris.

We look forward to working with you and BNF staff on this proposed amendment.

Sincerely,



Steve Schmidt, Co-Chair

ABSENT

Wayne Rusk, Co-Chair

Ravalli County Collaborative

Ravalli County Montana

215 S. 4TH STREET SUITE A
HAMILTON, MT 59840

August 8, 2022

Matthew Anderson, Forest Supervisor
Bitterroot National Forest
1801 N. 1st Street
Hamilton, MT 59840

Ref: Bitterroot Forest Plan Amendment Proposal, July 2022

The Ravalli County Collaborative (RCC) has received and reviewed the scoping announcement for the Bitterroot Forest Plan Amendment proposal and hereby provides the following comments.

The Ravalli County Collaborative is a diverse group of volunteers appointed by the Board of Ravalli County Commissioners whose adopted mission is to promote the wise use and management of public natural resources by local, state, and federal agencies within Ravalli County. The RCC employs a collaborative forum for reviewing and developing natural resource actions and policies that affect our community.

The RCC agrees that in the absence of updating the 1987 Bitterroot Forest Land Resource Management Plan it is necessary and past due to amend the Bitterroot National Forest (BNF) management standards for old growth, coarse woody debris, and snags. Rolling all three of these issues into one amendment proposal makes sense as they are intimately related.

Old growth stands are not just big and old trees. Rather old growth stands are living and thriving ecosystems that provide tremendous and essential benefits for wildlife and important ecosystem services for humans such as season long filtered water and carbon sequestration. Old growth forest stands, however, are becoming increasingly uncommon and will require special care and adaptive management.

The RCC recognizes that identifying and inventorying old growth stands is difficult. Currently, no generally accepted nor universally applicable definition of old growth exists. This is likely because old growth stands differ greatly by bioregion and forest type. Therefore, efforts to identify and map old growth must necessarily be locally (Forest) specific. We support utilizing Green et. al, 1992 to delineate old growth forest. <https://www.fs.usda.gov/project/?project=57302>

Old growth, coarse woody debris, and snag management is not an exact science. There is much unknown about old growth ecosystems and how best to care for them. As such, a well-defined adaptive management approach toward old growth management is required. Key to this approach are the following:

- Selection of the best science to characterize, inventory, and map old growth forest stands on the entire BNF
- Simultaneous development of and provision for a fully funded old growth monitoring program
- Annual reporting of old growth monitoring results
- Modification of future old growth management based upon lessons learned

Old growth forest on the BNF should be considered not just larger stands of old growth nor a percentage of the BNF. In order to achieve this objective, it will be necessary to complete a forest wide inventory of old growth, map the results of the inventory, and commit to keeping the inventory up to date.

President Biden's Executive Order 14072, April 22, 2022 directs the Secretary of Agriculture with respect to National Forest Lands to: "... within 1 year of the date of this order, define, identify, and complete an inventory of old growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and shall make such inventory publicly available." The RCC looks forward to reviewing these products sometime near the President's deadline of April 22, 2023. The RCC does not agree that the BNF should plan to inventory old growth stands solely during project planning. Inventory and mapping of old growth should begin in earnest and be forest wide.

The RCC recognizes that there will be a question about minimum old growth stand size to include in the inventory. We support the forest plan amendment proposal of a minimum stand size of 5 acres for old growth inventory purposes. However, we request that all old growth stands be preserved regardless of stand size.

An old growth inventory and mapping effort of existing old growth on the BNF is insufficient without additionally considering where and how to secure future stands of old growth. Please provide a map layer to depict where the BNF will manage for future stands of old growth and the measures the BNF will take to promote future old growth on the BNF.

To successfully defend the proposed amendment and its implementation, the BNF should take aggressive measures to acquire data on management indicator species (MIS) associated with old-growth habitats in the USFS Northern Region (Bollenbacher and Hahn, 2008). This acquired information may strengthen justification for management and direct protection of old growth stands in the BNF.

The RCC supports providing sufficient snags for wildlife habitat while also allowing for the removal of excess snags where necessary to address public safety, restoration objectives and/or fuel loading. The RCC also supports amending Coarse Woody Debris standards to align with the best available scientific information.

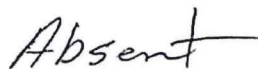
A desired future condition for old growth forest in the BNF may be difficult to describe. Attempting to return the forest to within "the range of natural variability" raises many questions. What point in time would we be trying to return old growth, coarse woody debris, and snags? It is unlikely that adequate historical information exists for the BNF to describe the nature and extent of old growth hundreds of years ago. Furthermore, with rapid climate change, it is increasingly difficult to predict what our forests will be in the future and therefore how best to manage them. Suffice it say, at this time, all old growth forest is precious for a wide variety of reasons. The BNF should move cautiously but methodically to preserve and even enhance old growth forest on the BNF.

The Ravalli County Collaborative intends to stay engaged on the development and implementation of the Bitterroot Forest Plan Amendment Proposal and intends to provide additional comments.

Sincerely,



Steve Schmidt
Co-Chair



Wayne Rusk
Co-Chair

SLS:sls

Bollenbacher, Barry and Beth Hahn 2008. USFS Northern Region Old Growth Management Considerations. Unpublished USDA Forest Service Northern Region Paper, July 2008.

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Kimberly Smolt, Project Manager
Bitterroot National Forest
1801 N. 1st Street
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