

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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April X, 2023

Mary Erickson, Objection Reviewing Officer  
Northern Regional Office  
26 Fort Missoula Road  
Missoula, MT 59804

Re: Montana Department of Natural Resources and Conservation, Comments on the South Plateau  
Draft Decision Notice and Request for Interested Party Status for Objections

Dear Ms. Erickson:

Thank you for the opportunity to comment on the Draft Decision Notice for the South Plateau Landscape Area Treatment Project. The Department of Natural Resources and Conservation (DNRC) previously provided comments on Draft Environmental Assessments for this project on September 16, 2020 and November 1, 2022. DNRC has fire protection interests and manages the State Trust Lands in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

The project area encompasses about 39,900 acres 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 (WUI), 14,381 acres of municipal watershed, clusters of homes, transmission sites, and other values. It's an area with high risk of significant impacts from uncharacteristic insect and disease and wildfire events.

DNRC supports the 16,462 acres of vegetation treatments proposed in the draft decision. The planning area is composed mostly of dense lodgepole pine stands that are overstocked and vulnerable to uncharacteristic insect and disease outbreaks and large, stand replacing wildfires. The proposed treatments would break up the dense continuous lodgepole pine stands and increase the diversity of vegetation composition and structure. This will increase stand resistance to insects and disease and reduce susceptibility to severe outbreaks.

The proposed treatments will reduce the number of acres in the high severity fire regime and reduce the risk to large, intense wildfires. This will provide more options for safe fire suppression and increase public safety. We support the limited treatments in old growth stands where there is a fuels concern within the WUI.

The Draft Decision incorporates the science-based adaptation strategies recommended by the Northern Rockies Adaptation Partnership. These include managing lodgepole pine forests for mixed

aged classes and successional stages and restoring natural fire regimes. The current extensive homogenous lodge pole pine forests are conducive to extremely large severe wildfires which emit large amounts of carbon and reduce carbon storage and sequestration. The treatments with this project will reduce the likelihood of large scale carbon impacts and mitigate the effects of climate change.

The Decision Making and Implementation process in Appendix A will allow for more detailed planning in implementation and provide flexibility to adjust treatments to changes in conditions in this dynamic landscape.

Because of our strong interests in this project, DNRC is requesting to remain an "interested party" regarding objections to the draft decision. If changes requested by another party present the potential to reduce the ability to meet wildfire risk and forest health goals, or adversely affect DNRC's fire protection of state and private lands, DNRC requests participation in objection resolution discussions.

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 management and restoration benefiting both agencies' missions.



Hoyt Richards  
Area Manager, Central Lands Office

Cc: Kara Huyser, Bozeman Unit Manager; Stephen Kimball, Local Government Forest Advisor