

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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April X, 2023

Aaron Webber, District Ranger
Townsend Ranger District
415 South Front Street
Townsend, MT 59644

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

Dear Mr. Webber:

Thank you for the opportunity to comment on the Draft Decision Notice for the Wood Duck Project. The Department of Natural Resources and Conservation (DNRC) provided comments on the proposed action for this project on November 7, 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 69,876 acres in the Big Belt Mountains east of Townsend and north of US Highway 12. The 2021 Woods Creek and Deep Canyon Creek fires burned over a large portion of the project area. The area has substantial risk for increased insect and disease outbreaks and mortality. Portions of the area are identified as Priority Areas for Focused Attention in the Montana Forest Action Plan due to risk of insect and disease impacts. Portions of the project area are also in a Farm Bill Priority Landscape designated by the Governor due to high risk of uncharacteristic insect and disease outbreaks.

DNRC supports the 2,977 acres of vegetation treatments proposed in the draft decision. Treatments would include intermediate harvest, regeneration harvest, and pre-commercial thinning. The treatments would strongly meet the Purpose and Need for the project which includes:

- Recover the economic value of forest products to contribute to employment and income in local communities;
- Ensure diverse and sustainable forest stands and habitats;
- Promote healthy desirable regeneration.

This aligns with the goals of the Montana Forest Action Plan which emphasize reducing wildfire risk and improving forest health across boundaries, and retaining a strong forest products industry as capacity for future forest restoration. The project would benefit communities in Broadwater and Meagher Counties which have a high proportion of federal lands in their land base.

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 Helena-Lewis and Clark 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: Objection Reviewing Officer, USDA Forest Service Northern Region;
Heidi Crum, Helena Unit Manager; Stephen Kimball, Local Government Forest Advisor