

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Central Land Office • Helena Unit

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July 21, 2023

Jamie Tripp and Kristen Thompson, District Rangers
Dillon and Wisdom Ranger Districts
420 Barrett St.
Dillon, MT 59725

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

Dear Ms. Trip and Ms. Thompson:

The Montana Department of Natural Resources and Conservation (DNRC) has reviewed the Draft Decision Notice for the Selway Saginaw project. We are providing comments to consider for the final Decision Notice. This is not an Objection to the project decision.

DNRC has fire protection interests and manages 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.

DNRC supports the Purpose and Need for the project which includes increasing vegetation diversity to move forest conditions towards the desired conditions identified in the Forest Plan. The project will improve wildlife habitat, increase resiliency to insect and disease outbreaks and severe wildfire, increase timber productivity, and provide forest products and economic benefits for local communities. The project purpose aligns well with the Montana Forest Action Plan.

DNRC supports the treatments in the Modified Proposed Action (Modified Alternative 2) which includes vegetation treatments to improve diversity and resiliency of the landscape. Regeneration treatments in mature lodgepole pine stands, precommercial thinning in young stands, and removal of encroached conifers will increase vegetation diversity and improve forest health, resiliency, and habitat quality.

There is a clear need for more acres in openings and younger age classes of trees in the planning area. Timber removed to increase vegetation diversity will produce forest products and contribute to the economic stability of local communities.

In the final decision please consider the following changes:

- 1) In the Purpose and Need re-insert this fire-fuels management goal that was in the scoping document and Draft EA but not in the Final EA or Draft Decision Notice:

A full range of fuels management activities is available to achieve ecosystem sustainability, including, economic and social components.

This area has dense lodgepole pine, significant insect and disease mortality, and is located 7 or 8 miles south of Jackson. The Montana Forest Action Plan shows most of the area as Priority for Focused Attention due to high risk to wildfire and insect and disease impacts. The need for resiliency and the potential threat to the community warrants retaining this fire-fuels goal in the Purpose and Need. We disagree with the statement in the Final EA that fuels reduction is not a driver of the proposed action and would like to see this re-inserted.

- 2) In the final decision include intermediate treatments of the 2,417 acres of old growth that was in the proposed action in the Draft and Final EA but not in the Draft Decision Notice. As mentioned in the Final EA:

Treatment in these stands would contribute to meeting Forest Plan resiliency goals described in the purpose and need. Namely, a reduction of density in these units is needed to decrease stand-level hazard to mountain pine beetle mortality, and landscape-level risk of widespread mountain pine beetle mortality. Intermediate thinning in these units would maintain or exceed minimum old growth criteria post-harvest by only treating a portion of proposed unit acres at a low-level.

The Draft Decision Notice doesn't provide a rationale for deferring these treatments. In addition to reducing risk to insect and disease impacts to old growth, the treatments would increase resiliency to wildfire and increase the probability that these stands will continue to function as old growth into the future.

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 Beaverhead-Deerlodge 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.

Sincerely,



Hoyt Richards

Area Manager, Central Lands Office

Cc: Objection Reviewing Officer, Forest Service Northern Region; Tim Egan, Dillon Unit Manager; Stephen Kimball, Local Government Forest Advisor



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AND CONSERVATION
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