

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

## STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074  
FAX: (406) 444-2684

PO BOX 201601  
HELENA, MONTANA 59620-1601

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Linda Walker  
Acting Director, Ecosystem Management Coordination  
U.S. Forest Service  
U.S. Department of Agriculture  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250-1124

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System (65356)

Acting Director Walker:

Thank you for the opportunity to comment on the U.S. Department of Agriculture (USDA) and U.S. Forest Service (USFS) proposal to amend all 128 National Forest management plans to include direction regarding old-growth forests. The Montana Department of Natural Resources and Conservation (DNRC) manages 5.2 million acres of state trust lands, provides wildland fire protection to over 50 million acres of land, and works with local, state, and federal agencies to reduce wildfire risk and improve forest health across ownership boundaries. The DNRC is a strong partner with the USFS under the Good Neighbor Authority and works cooperatively to implement the Montana Forest Action Plan which provides a consistent framework for reducing wildfire risk and improving forest health. The DNRC is also a key partner in forest plan revisions, forest plan amendments, and project plans for national forests across Montana.

In light of our partnerships with USFS, this national scale planning effort is problematic. DNRC would advise amending individual forest plans to ensure local engagement rather than on an overarching Environmental Impact Statement for all 128 national forests. The nationwide old-growth inventory demonstrates the significant variability in characteristics and conditions of old-growth ecosystems across different geographic areas and habitats. Consequently, the need, scope, and urgency for the amendments will vary considerably across the national forest system. For example, several forest plans in Montana have been recently revised or amended to incorporate the best available science to address old-growth conservation.

A primary consideration in conserving and stewarding old-growth ecosystems is mitigating severe wildfires, the leading threat according to your initial analysis, followed by insects and disease outbreaks. Therefore, it is critical that forest plan amendments do not impede or deter forest management projects that mitigate these risks. This is especially important as inventory analysis did not take into consideration the existing health or stand condition of old-growth forests.

Further, the time and resources required for this national effort will be substantial and the resulting product will be modestly useful at best in meeting the intent to conserve old-growth. Planning at the local forest level will allow for strategic scheduling and use of staff to minimize impacts to critical projects in progress and ensure meaningful public participation in the process.

The Notice of Intent states that the purpose of the amendment is to establish consistent direction to foster ecologically appropriate management across the National Forest System. A national framework for conserving old-growth will hinder local land managers in meeting the ambitious goals set forward in the USDA Forest Service's "Confronting the Wildfire Crisis Strategy." Developing national standards and prescriptions for old-growth management will be expensive and ineffective due to the diversity of forest conditions throughout the national forest system. Interdisciplinary teams at the forest level should have the ability to create flexible, tailored standards to address specific habitats, health conditions, and manage threats like wildfires and insects and disease. Locally led management allows forests to adaptively schedule amendments, allow the public to participate, and minimize impacts to projects in development to reduce wildfire risk and improve forest health.

The western states are facing an unprecedented wildfire and forest health crisis. In Montana, our core fire season is 40 days longer than it was thirty years ago. The uncharacteristic size and severity of wildfires is threatening ecosystems and communities. Over 64 percent of forested lands in Montana are federally owned, and of that federal ownership, 53 percent is not available for active management due to existing use designations. The best science shows that forest treatments reduce the risk of severe crown fires and increase the options for safe fire management that will prevent uncharacteristic stand replacing wildfires and associated impacts. If we do not address overall degraded forest conditions, old-growth forests will ultimately be impacted.

The Montana Forest Action Plan identified approximately one-third of the state's forested landscape as having "significant forest health concerns and high wildfire risk to communities and infrastructure." In order to successfully accomplish the collaboratively developed goals in state forest action plans, the national fire strategy, and local land management plans, flexibility is required when addressing old-growth forests. National consistency comes with a tradeoff of flexibility. Without management flexibility, our efforts to address the broader context of landscape scale degraded forest health including old-growth and wildfire risk will fall short. This points to the critical need to keep plans for conservation of old-growth at the forest level.

Thank you again for the opportunity to provide feedback. If you have any questions, please reach out to Shawn Thomas, State Forester, at 406-444-4978 or [sthomas@mt.gov](mailto:sthomas@mt.gov).

Sincerely,



Amanda Kaster, Director  
Montana Department of Natural Resources and Conservation