

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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## STATE OF MONTANA

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March 3, 2023

Matt Anderson, Forest Supervisor  
Bitterroot National Forest  
1801 N. 1<sup>st</sup> Street  
Hamilton, MT 59840

Re: Montana Department of Resources and Conservation, Comments on the Draft  
Environmental Assessment for the Bitterroot Forest Plan Amendment for Elk Habitat, Old  
Growth, Course Woody Debris, and Snags

Dear Mr. Anderson:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Bitterroot Forest Plan Amendment that addresses elk habitat, old growth, course woody debris, and snag components. The draft EA outlines a comprehensive approach that incorporates new information, including the best available science, and corrects contradictory language in the 1987 Forest Plan with regard to these components.

The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands within and near the boundaries of the Bitterroot National Forest. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. Management of the national forest lands affect conditions and outcomes on nearby state and private lands. Also, DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing restoration projects on the Bitterroot National Forest. The proposed changes will be incorporated into projects DNRC prepares and administers through GNA.

DNRC supports the proposed new objectives and standards for managing elk habitat. New information and changed circumstances warrant new standards and protocols that are more suitable for guiding management activities with regard to elk habitat. The 17 project-specific amendments since 1997 related to elk habitat management show the need for a more up-to-date Forest-level approach to managing these habitats.

DNRC supports modifying the old growth forest-wide standards and glossary definitions to those described in Green et al (2011). Green et al is widely recognized as the best available science for assessing old growth in the Northern Rockies. The amendment will align with direction in Executive Order 14072 which calls for consistent and reliable identification and inventory of old growth. DNRC supports the desired condition which includes increasing the amount of old growth in the landscape by increasing the resistance and resilience of old growth to disturbances and stressors.

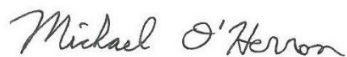
DNRC supports updating the new direction on course woody debris (CWD) to incorporate the latest science and resolve contradictory direction. The best science recognizes differences in natural variation of CWD among forest and habitat types and the Forest Plan component will be modified to reflect this.

DNRC supports the new direction for management of snags to resolve the contradictory language for wildlife habitat and allow for removal of excess snags where necessary to reduce fuel loading or to meet objectives for restoration, salvage, and reforestation.

With regard to all three components, monitoring and evaluation will be important to assess how effective the new components are in meeting goals of the Forest Plan and the Montana Forest Action Plan. The amendment states that monitoring of old growth, course woody debris, and snags will be completed with project planning and post-treatment surveys. If monitoring trends show declines in stand and habitat characteristics these components will need to be reviewed for adjustment.

DNRC is committed to continuing our positive working relationship with the Bitterroot 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 and watershed management and restoration, benefiting both agencies’ missions.

Sincerely,

A handwritten signature in cursive script that reads "Michael O'Herron".

Mike O'Herron  
Area Manager, Southwestern Land Office  
Montana Department of Natural Resources and Conservation

Cc: Thayer Jacques, Unit Forester; Stephen Kimball, Local Government Forest Advisor