

Data Submitted (UTC 11): 7/20/2023 6:00:00 AM

First name: Amy

Last name: Gannon

Organization: Montana Fish, Wildlife and Parks

Title:

Comments: From: Kimball, Stephen <Stephen.Kimball@mt.gov>

Sent: Thursday, July 20, 2023 2:52 PM

To: Milburn, Amanda - FS, MT <amanda.milburn@usda.gov>

Subject: FW: Lolo Revision pre-public release materials: Draft Assessment and PSCC lists

Our Forest Pest Specialist reviewed the Draft Assessment and sent a few informal comments.

Steve Kimball

Local Government Forest Advisor, Montana DNRC

406-210-5691

Stephen.Kimball@mt.gov

2705 Spurgin Road

Missoula, MT 59804

From: Gannon, Amy <agannon@mt.gov>

Sent: Monday, July 10, 2023 4:18 PM

To: Kimball, Stephen <Stephen.Kimball@mt.gov>

Subject: RE: Lolo Revision pre-public release materials: Draft Assessment and PSCC lists

Hi Steve,

Sorry not to have compiled any thoughts on this earlier. Nothing shocking jumps out, but it is interesting that the discussion focuses so heavily on climate, particularly "multidecadal dry cycle" pattern. There are some many other factors impacting the Lolo forest conditions, including a landscape-scale lack of disturbance and shift toward an insect and disease susceptible forest. The first sentence calls it out but there seems to be an opportunity to elucidate how:

* homogenization of lodgepole contributed to the mountain pine beetle outbreak (and sets us up for landscape impacts again in the future)

* in-growth of Douglas-fir in the understory supports ongoing western spruce budworm outbreaks (and Douglas-fir tussock moth)

* increasing density of ponderosa pine stresses residual trees and shifts age class and structure to smaller, compromised trees that are not as useful for wildlife habitat

* unchecked growth of shade-tolerant tree species (DF) are also those that are more susceptible to many of the major root diseases in the area (Armillaria)

* unmanaged stands allow for an amplification of dwarf mistletoes that compromise tree vigor and infect regeneration

Yes, drought is a major player in the mortality and decline we're currently witnessing, but we've done a lot to set up forests for insect and disease outbreaks. Upside is that deliberate, landscape-scale management can remedy these conditions.

Please call if you want to discuss it any further.