

**DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION**

Central Land Office - Helena Unit



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STATE OF MONTANA

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October 9, 2020

Jamie Tripp and Molly Ryan, District Rangers
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, MT 59725

Re: Montana Department of Natural Resources and Conservation, Comments on the Proposed Action for the Selway-Saginaw Vegetation Management Project

Dear Ms. Tripp and Ms. Ryan,

Thank you for the opportunity to comment on the Proposed Action for the Selway-Saginaw Vegetation Management Project. The project area includes about 66,289 acres of national forest lands in the Lima-Tendoy and Big Hole Landscapes. The Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages 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 is not only important for the national forest system lands but also for the state and private landowners in the area.

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. There is a strong need to break up the dense, homogenous mature lodgepole pine stands in this area and to reduce conifer encroachment. Stands in the planning area are highly susceptible to Mountain Pine Beetle outbreaks. The project would improve wildlife habitat, increase resiliency to insect and disease outbreaks, increase timber productivity, and provide forest products and economic benefits for local communities. The project purpose aligns well with the State's Forest in Focus and the Montana Forest Action Plan.

DNRC supports the vegetation and road treatments proposed 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 in the planning area. Timber removed to increase vegetation diversity will produce forest products and contribute to the economic stability of local communities.

The environmental analysis should provide more information on the location and extent of private lands. It also should discuss in detail fuels conditions and wildfire risk, and how the proposed treatments would connect with work on state and private lands to reduce risk and protect public and firefighter safety. The analysis should also provide detailed information on current wildlife habitat conditions and how the proposed treatments would improve habitat quality.

DNRC supports evaluating conifer encroachment treatments within the Tash Peak and West Big Hole Inventoried Roadless Areas (IRA's). The analysis for this project should include details on vegetation conditions and the effects of treating versus not treating stands in the IRA's.

DNRC supports treatments to reduce risk of losing the unique old growth and large trees in the planning area to fire or insects and disease. It will be important to ensure the treatments retain old growth characteristics in these stands.

DNRC is committed to continuing a positive working relationship with the Beaverhead-Deerlodge National Forest, specifically relating to landscape resiliency, wildlife habitat restoration, wildfire response, community protection, and sustainable forest management. DNRC has programs to assist private landowners in the area with treatments on their lands. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting the missions of our agencies.

Sincerely,

A handwritten signature in blue ink that reads "Hoyt R. Richards".

Hoyt Richards, Area Manager, Central Land Office
MT Department of Natural Resources and Conservation

CC: Tim Egan, Dillon Unit Manager; Brian Robbins, Anaconda Unit Manager; Stephen Kimball-Local Government Forest Advisor