



October 14, 2020

Montana Forest Action Advisory Council
montanaforestactionplan@mt.gov

RE: Montana Forest Action Draft Plan

Dear Council Members,

The members of the Montana Wood Products Association (MWPA) would like to take this opportunity to thank you for your work on the Advisory Council.

The MWPA represents primary and secondary Montana wood manufacturers, wood workers, forest practitioners, Montana businesses, and forest-dependent communities that rely on a vibrant forest products industry. We have a century-long tradition of providing local employment and manufactured wood products.

Therefore, we support the goal of the Advisory Council to develop three main deliverables: a comprehensive Statewide Assessment of Forest Conditions (Assessment), identification of priority areas and a set of recommended goals and strategies that create an efficient, effective response to those conditions. We support strategies and deliverables that improve forest health, reduce the risk of catastrophic wildfire, conserve working forests and enhance opportunities for the public to enjoy our open spaces.

Forest Action Plans are a required decadal work product of the federal Farm Bill. As a result of the 2010 Montana Forest Action Plan, the State received nearly \$50 million in grant funding through State and Private Forestry and other national programs. These funds helped conserve working forests, protected forests from insects and disease, and assisted private landowners in managing their forests.

In seeking to expand beyond the original guidance in the Farm Bill, the 2020 revision of the Montana Forest Action Plan, looked for ways to build upon the 2010 Assessment and provide a framework that fosters more coordination and cooperation at the statewide and local level through better planning, and scaled partnerships at the community level. This framework hopes to place Montana at a more competitive advantage for critical future program funding.

As identified in the Assessment, Montana is host to over 23 million acres of forested land and approximately 9.1 million acres of our forested land is identified as "Areas with Elevated Fire Risk and Degraded Forest Health." The statewide Assessment of forest conditions provided a critical updated analysis of forests, trends, and threats across Montana's forested landscapes. According to the Assessment, updated statistics are staggering. Wildfire has destroyed 2.7 million acres over the past 10 years, with 8.5 million acres identified as having a

“high” or “very high” wildfire risk and roughly 6 million forested acres are within ½ of the wildland urban interface. In addition, over 9 million acres are currently at risk of insect and disease infestations. Clearly, we are facing an “all hands-on deck” situation.

The Advisory Council identified a set of recommended goals and strategies, from improving watershed conditions, reducing wildfire risk to communities, mitigating for climate change, to supporting, and maintaining the forest products infrastructure, to name just a few.

Improving Watershed Conditions

The Assessment suggests supporting projects that maintain or improve intact and connected forested landscapes and watershed and explore opportunities to expand funding for streamside and instream restoration and actions to improve impaired waterbodies, and to maintain and strengthen the level of compliance with Forestry Best Management Practices across all ownerships.

Montana’s Best Management Practices (BMPs) undergo a biennial audit and have a proven track record of application and effectiveness on private, state, and federal forests for over 30 years. BMPs are an important set of management practices, that when applied, maintain, or improve watershed conditions, however; a more specific set of implementation strategies are needed. With over 9 million acres identified at risk, and roughly 100,000 acres of harvest and prescribed fire per year, it will take us 90 years to improve condition class, **if** growth and mortality are stagnant. Timber harvest plays a vital role in improving watershed conditions and reducing wildfire risk to communities, but a more comprehensive approach is needed.

The state should leverage relationships within the Western Governors’ Association, U.S. Forest Service, Bureau of Land Management, Congress and local leadership to develop comprehensive, long-range plans that improves watershed conditions and ecological integrity, that is economical, and supports local communities and the workforce. Plans should allow for site-specific environmental analysis, with congressional protections from litigation. Plans should establish a short and long-term program of work, targeted accomplishments, project monitoring and periodic program review. Plans may fall under such concepts as Shared Stewardship, incorporate tools such as the Good Neighbor Authority, Stewardship Contracting, or Joint Chief’s. However, new comprehensive authorities such as community forests, or an authority patterned after the 1933 Tennessee Valley Authority, etc. must be identified and developed. There is no doubt, to improve forest conditions and get to the pace and scale that is needed to protect forests and communities, comprehensive watershed ideas must emerge.

Reducing Wildfire Risk to Communities

It is important to prioritize projects within Priority Areas for Focused Attention when planning wildfire risk reduction projects. The use of mechanical treatments and prescribed fire, where and when appropriate, helps to reduce the future risk of wildfire. We cannot control weather or topography. We can only control how much fuel is available to burn. Cost-share programs that provide the financial resources to treat landscapes within the WUI are vitally important and state and federal financial support for cost-share programs should be increased.

The topic of air quality and the impacts on human health were not addressed. Air quality and the detrimental effects on human health due to wildfire is an important topic. The 2017, wildfire season recorded particulate levels from moderate, to unhealthy, to very unhealthy, to hazardous. The Montana Department of Environmental Quality suggests that potential health impacts include serious and long-term heart and lung complications for all ages, especially for sensitive groups of people.

Mitigating for Climate Change

Forests are important carbon sinks and play an important role in mitigating for a changing climate condition. U.S. forests alone store 14 percent of all annual carbon dioxide emissions. Unfortunately, due to recent intense forest fires, Montana’s forests are no longer considered a carbon sink, but a carbon emitter. For our forests to

play the historic role of a carbon sink, we must improve forest health and minimize the risk of catastrophic wildfires. Again, implementation strategies must provide for more specific action-oriented solutions.

Supporting and Maintaining the Forest Products Infrastructure

Montana's forest products industry relies on a steady and sustainable supply of wood fiber. Over the past 30 years, Montana has lost 31 mills and roughly 4,000 jobs. Federal timber harvest has declined from 600mmbf in 1990 to 200mmbf in 2019. Montana mills are not operating at full capacity and have not fully recovered from the 2008 recession. Increasing available wood fiber will produce a consistent and sustainable supply, that will serve to maintain and increase the forest products infrastructure levels required to meaningfully address forest health and reduce the risk of wildfire.

Coupled with an increase in timber supply, workforce challenges must be addressed and resolved. The strategies are lacking in specific academic programs, mentorship and apprenticeship opportunities, and labor development suggestions. However, with a sustainable supply of wood fiber and a qualified workforce, Montana's forest products industry will create opportunities and rise to the challenge of producing products for emerging and established domestic and global markets.

Additional Data Sets

The Plan suggests using the words "Road Density" to measure landscape access, including all maintained roads in the state of Montana with buffers extending out from roads, using a weighted gradient from 0-5 miles, with the highest weight being applied within 0-1/4 mile of a road. Inclusion of this dataset identifies and increases the weight of lands that are more readily accessible. In looking at the data, the metric is the distance to the nearest road. The Plan should refer to this as "Road Proximity" instead of density. This better reflects the beneficial concept of how close roads are to assist in the treatment of forests.

Overall, the draft Forest Action Plan provides well-thought out goals for the various topics identified for concern. However, specific implementation strategies and a set of deliverable outputs, within each area of concern, are missing.

Forests should provide clean water, clear air, viable wildlife habitat, forest products, recreational opportunities, and jobs. Thank you for this opportunity to comment. We look forward to reviewing the final Forest Action Plan and future implementation of the goals.

Sincerely,

Julia Altemus

Julia Altemus
Executive Director
Montana Wood Products Association
julia@montanaforests.com