

Swan View Coalition

Nature and Human Nature on the Same Path



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June 23, 2025

Mark Slaten
NW Land Office MT DNRC
655 Timberwolf Parkway
Kalispell, MT 59901

Re: Foothills North Block Management, sent as a pdf via email to mark.slaten@mt.gov

Dear Mr. Slaten;

Please accept into the public record this second letter of comments in the above matter, wherein we cite to your Administrative Rules for Forest Management.

1. Again, we appreciate that DNRC intends to not thin or log “stands that are majority western hemlock.” We note that 36.11.416 Biodiversity – Management on Scattered Lands requires that, when “rare or unique habitat elements” occur naturally, DNRC “shall manage so as to retain those elements.” We believe that the area’s increasingly rare stands of hemlock and old-growth hemlock qualify for this protection.

2. We are concerned that the year-after-year logging and thinning on DNRC lands in this area may violate the Rules that limit road density and the duration of forest management activities. Please insure that your activities comply with 36.11.432 Grizzly Bear Management and Programmatic Rules, which include but are not limited to:

(6) On scattered parcels in recovery zones, where grizzly bear programmatic rules, ARM 36.11.432(1), NROH rules, ARM 36.11.432(2), and recovery zone rules, ARM 36.11.432(3) also apply, the department commits to:

(a) evaluate each open road segment occurring within a forest management project to assess the potential to restrict access on that segment;

(b) **not exceed baseline open road amounts at the administrative unit level, established August 31, 2018**, on classified forest lands, but increases in open road densities at the project level to address road relocation considerations would not count against the unit-level cap;

(c) conduct commercial forest management activities and salvage harvest for each scattered parcel in a recovery zone **for a maximum management period of four years, followed by a mandatory rest period of at least eight years**, where each parcel will have its own management schedule independent of other parcels; (emphasis added)

We ask that the EA address these issues and these limits directly and be fully transparent in explaining how the Project will comply with them.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and fluid, with a long horizontal stroke at the end.

Keith J. Hammer
Chair