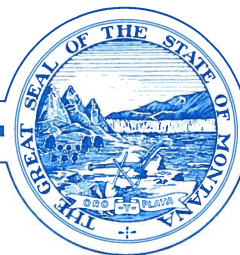


DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION



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August 15, 2019

Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Notice of Montana Department of Natural Resources and Conservation (DNRC) Objection to the Taylor-Hellroaring Project, Flathead National Forest.

Pursuant to 36 CFR [sect] 218 Subparts (A) and (B), Montana Department of Natural Resources and Conservation hereby objects to the Taylor-Hellroaring Project (project), proposed by the Flathead National Forest. DNRC'S objection is submitted as support for moving the actions identified in the Draft Decision Notice to a final decision and implementation.

Connection to Prior Specific Comments: Montana DNRC submitted comments on the Proposed Action during scoping in April 2017. Montana DNRC submitted comments on the Environmental Assessment in May 2019. The comments stated DNRC's support for the proposed vegetation treatments, fuels reduction, fuel breaks, and road construction. The balance of treatments tentatively selected in the Draft Decision Notice are important to ensure the safety and success of fire suppression operations and to protect values at risk such as homes and communication facilities. There is a strong need to reduce tree densities and fuel loadings in the project area to reduce intense fire behavior near communities and facilitate safe wildland fire operations. Past fire suppression has resulted in dense stands and increased fuel loading near private lands and private property. Active management is needed to increase diversity and resiliency of the forests and associated wildlife habitat in the project area.

The project is not only important for the national forest system lands, but also for the neighboring private landowners and DNRC, which manages Trust Lands in the area and has private land wildland fire protection responsibility. DNRC is responsible for fire suppression on the portions of the project area east of Hellroaring basin and will therefore benefit from the improved access for fire suppression and breaking up the continuity of fuels will increase firefighter safety when ignitions occur. For these reasons we are pleased to be a partner on this project through Forest in Focus Initiative funding and we look forward to implementing portions of the project through the Good Neighbor Authority.

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Reasons for Objection: We are concerned that the treatments identified in the Environmental Assessment and Draft Decision may be modified prior to the final decision and implementation. If changes are requested by another party, and if the final decision differs substantively from Alternatives 2 and 3, the outcome may not adequately reduce wildfire risk and balance multiple benefits. In addition, if the current analysis is not enough to support these changes, the project may not be implemented in a timely manner. As such, we intend use the objection process to support the treatments identified in the Draft Decision, help address any remaining issues of uncertainty, strengthen the project record, and participate in any objection resolution discussions with any other objectors.

The DNRC formally requests to be included as an interested party in objection resolution for this project. As an interested party the DNRC would like to attend objection meetings as an active participant in support of the implementation of this project.

Sincerely,



Greg Poncin
Area Manager
Northwestern Land Office
MT DNRC

cc: Ben Garrett, GNA Forester
Steve Kimball, County Forest Advisor
Matt Arno, Forestry Assistance Bureau Chief
Neil Simpson, DNRC-USFS Liaison