DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Forestry Division



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November 26, 2019

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

FAX: (406) 542-4217

Re: Notice of Montana Department of Natural Resources and Conservation Objection to the Crystal Cedar Project, Flathead National Forest.

Dear Reviewing Officer:

Pursuant to 36 CFR [sect] 218 Subparts (A) and (B), Montana Department of Natural Resources and Conservation (DNRC) hereby objects to the Crystal Cedar Project proposed by the Flathead National Forest. DNRC'S objection is submitted as support for moving the actions identified in the Selected Alternative in the draft decision forward to a final decision and implementation.

Connection to Prior Specific Comments: DNRC submitted comments on the Draft Environmental Assessment (EA) on July 3, 2019. DNRC's comments expressed support for the Proposed Action as the best alternative to meet the Purpose and Need for the project. The balance of treatments in this alternative would increase resiliency to insects and disease, reduce wildfire risk, and allow for safe and effective fire management. These treatments would improve diversity and resiliency of forest vegetation and habitats across the landscape and provide forest products to contribute to local jobs and income.

The project is not only important for the national forest system lands, but also for the neighboring private landowners, and the DNRC who both manages Trust Lands and has wildland fire protection responsibility within part of the project area. There is a strong need to reduce tree densities and fuel loadings across boundaries to reduce intense fire behavior near communities and facilitate safe wildland fire operations.

<u>Reasons for Objection</u>: DNRC strongly supports the Selected Alternative in the Draft Decision Notice. We are concerned that the balance of treatments in this alternative 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 the Selected Alternative, the outcome may not adequately reduce wildfire risk and balance multiple benefits. In addition, if the current analysis is insufficient to support these changes, the project may not be implemented in a timely manner. As such, we intend to use the objection process to support the treatments

identified in the Selected Alternative 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.

Areg Porcin

Greg Poncin Area Manager, Northwestern Land Office MT Department of Natural Resources and Conservation

CC: Dave Poukish, Unit Manager; Stephen Kimball-Local Government Forest Advisor