DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Southern Land Office

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February 10th, 2020

Ken Coffin, District Ranger
Beartooth Ranger District
6811 US Highway 212
Red Lodge, MT 59068

Re: Montana Department of Natural Resources and Conservation, Comments on the Greater Red Lodge Area Vegetation and Habitat Management Project Draft Supplemental Environmental Impact Statement.

Dear Mr. Coffin,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the Greater Red Lodge Area Vegetation and Habitat Management Project. The draft Supplemental Environmental Impact Statement (SEIS) was developed to correct errors related to the Lynx habitat and analysis and the Wildland Urban Interface (WUI) designation in the Carbon County Mitigation Plan/Community Wildfire Protection Plan.

The project area comprises about 21,871 acres of national forest lands and includes private land inholdings. The area is near the community of Red Lodge which is at high risk of impacts from wildfire. National Forest System lands in the project area were designated in 2014 by the Governor of Montana as priority landscapes for insect and disease treatments, under Section 602 of the Healthy Forest Restoration Act as amended by the 2014 Farm Bill.

The Department of Natural Resources and Conservation (DNRC) has fire protection interests surrounding this area upon both private and state-owned lands, and in addition manages the State Trust Lands adjacent to and within the project 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 four points in the purpose and need for the project: 1) Reduce fuel loadings within the WUI to result in less intense fire behavior and facilitate safe wildland fire operations; 2) Maintain and improve the resiliency of forest vegetation and grassland; 3) Enhance aspen habitat; and, 4) Improve water quality. DNRC also supports the 1,807 acres of proposed vegetation treatments. These treatments will improve the diversity and resiliency of the project area and meet Forest Plan desired conditions. This is important for the health of forests in these landscapes and aligns with the State of Montana's Forest in Focus 2.0 initiative which focuses on forest restoration and industry retention.

Past fires and management, including fire suppression, have resulted in dense stands with high fuel loadings that are conducive to high intensity, uncharacteristic wildfire and epidemic insect and disease outbreaks. Many large destructive stand replacement fires have been the overwhelming impact on the forest the last 20 years. These fires have resulted in significant property damage and a significant loss of habitat and forest resources as well as impact on the Montana tourism economy. The current threat of future destructive stand replacement in the Red Lodge area is significant. DNRC is supportive of the landscape-scale approach to vegetation management, including the design of treatment areas that will result in a mosaic and variable tree retention to fit within the range of historic forest structures and habitat conditions created by frequent fire. The vegetation treatments proposed will effectively move stands towards the desired conditions and improve resiliency. Stands in the WUI, particularly near property, should be treated enough at a minimum, for fire to drop to the ground and provide safe conditions for firefighter engagement. This may result in wider spacing and more openings than what is prescribed for other management objectives. Also, please consider the need for effective fuel breaks along key public access roads, particularly roads accessing private property.

Timber removed to increase forest health and resilience will contribute to the economic stability of local communities and help retain operators and manufacturers as capacity for the future. The Montana timber industry is the main tool and mechanism for the Forest Service and the State for completing forest improvement and restoration projects. Keeping this vital infrastructure is of paramount importance to the State of Montana and the US Forest Service so that we can fulfill our missions of responsible managing the forest we are entrusted. In project implementation consider design factors that can increase the economic viability of the project while still meeting forest restoration objectives.

DNRC has undertaken several similar projects within the general area of this proposed management activity in recent years and is currently in the process preparing several others. This type of collaborative effort produces the necessary landscape scale restoration effort necessary to achieve the projects goals across management and ownership boundaries. DNRC is committed to continuing a positive working relationship with the Custer Gallatin National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. DNRC has programs to continue to assist private landowners in the area with treatments on their lands. We have a growing Good Neighbor Authority (GNA) Program and will be working with you to consider opportunities for GNA projects during implementation. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.

In summary, we both appreciate and support your efforts to bring this project to implementation and look forward to continuing to work together with you in doing so.

Sincerely,

Derek Yeager
Acting Area Manager-Forestry Division, Southern Land Office
MT Department of Natural Resources and Conservation
Billings, MT

CC: Stephen Kimball- Local Government Forest Advisor,