

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Central Land Office - Helena Unit



STEVE BULLOCK, GOVERNOR

STATE OF MONTANA

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June 7, 2020

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

Re: Montana Department of Natural Resources and Conservation, Objection to the Horsefly Vegetation Project

Dear Reviewing Officer:

Pursuant to 36 CFR [sect] 218 Subparts (A) and (B), Montana Department of Natural Resources and Conservation (DNRC) hereby submits this objection to the Horsefly Project on the Helena-Lewis and Clark National Forest. DNRC'S objection is submitted as support for moving the actions in the draft decision's selected alternative forward to a final decision and implementation.

Connection to Prior Specific Comments: DNRC submitted comments on the Proposed Action for the Horsefly Project on April 18, 2018, and on the Preliminary Environmental Assessment on February 9, 2020. DNRC's comments highlighted the need to reduce hazardous fuels and improve forest conditions in this landscape. 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. This project will reduce the high risk of intense fire behavior in this area. Over 70% of the planning area is designated as Wildland Urban Interface (WUI) in Meagher County's Community Wildfire Protection Plan. The treatments in this project are critical for the protection of residents and visitors from wildfire and for the safety of firefighters. The project will improve forest health, provide wood supply for local mills, and contribute to local economic stability and retention of the timber industry in Montana.

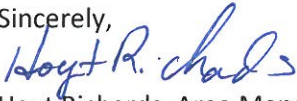
DNRC has a signed Good Neighbor Authority (GNA) agreement with the Helena Lewis and Clark National Forest to increase the pace and scale of restoration across boundaries. Specifically, the signed agreement sets the stage for the DNRC to administer portions, or all, of the work identified within the Horsefly Vegetation Project. DNRC also has programs to assist private landowners in the area with treatments on their lands. With this commitment and assistance programs we are working towards an "all lands" approach to restoring forest and watershed conditions and protecting communities and firefighters in this landscape.

Reasons for Objection: DNRC strongly supports the Selected Alternative in the Draft Decision Notice (Alternative 2 Modified). We are concerned that the balance of treatments in this alternative may be modified prior to the final decision and project 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 not enough to support these changes, this joint 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 other objectors.

The DNRC formally requests to be included as an interested party in objection resolution for this project. DNRC has been a partner in the development of this project and has strong interest in the final decision and implementation. This project, along with treatments on state and private lands, is crucial to meeting our mutual goals of improving forest conditions across ownerships in this landscape.

Sincerely,

A handwritten signature in blue ink that reads "Hoyt R. Richards". The signature is fluid and cursive, with the first name "Hoyt" being the most prominent.

Hoyt Richards, Area Manager, Central Land Office
MT Department of Natural Resources and Conservation

CC: Heidi Crum , Unit Manager; Stephen Kimball- Local Government Forest Advisor