

**DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION**
Forestry Division



STEVE BULLOCK, GOVERNOR

STATE OF MONTANA

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November 4, 2020

Chad Benson, Forest Supervisor
Kootenai National Forest
31374 US Highway 2
Libby, MT 59923

Re: Montana Department of Natural Resources and Conservation, Comments on the Black Ram Project Draft Decision

Dear Mr. Benson,

Thank you for the opportunity to comment on the Black Ram Project. DNRC concurs that there is a strong need to treat vegetation in this landscape to increase resiliency to uncharacteristic wildfire and insects and disease events, and to improve the quality of wildlife habitat. DNRC supports the Purpose and Need for the project, including the following components which connect strongly to the State of Montana's Forest in Focus 2.0 and Forest Action Plan:

- Promote resilient vegetation conditions by managing landscape level vegetation patterns, structure, fuel loading, and species composition;
- Reduce the potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions in the Wildland Urban Interface (WUI) and other areas with values at risk;
- Provide forest products that contribute to the sustainable supply of timber products from national forest system lands.

DNRC supports the selection of Alternative 2 in the Decision as it provides for treatment of the most acres and provides the most volume to support retention of industry infrastructure. This alternative best meets our shared goals of forest restoration and timber industry retention.

DNRC is committed to continuing a positive working relationship with the Kootenai National Forest by focusing on objectives that are beneficial to landscape resiliency, wildfire response, community protection, and sustainable forest management and access. While this project will improve landscape vegetation conditions, reduce potential for intense wildfire, and provide forest products, it does not address wildfire risk in the highest priority WUI areas in the County as described in the 2013 Community Wildfire Protection Plan. The WUI in Lincoln County contains some of the highest risk for wildland fire impacts in the state. DNRC has been working with the Forest Service and Lincoln County to update the CWPP and developed a Memorandum of Understanding with the Forest and County to formalize our joint commitment to reduce wildfire risk in the WUI. DNRC asks that the Kootenai National Forest prioritize its efforts in the WUI as it plans the program of work and allocation of Forest resources. DNRC supports

priority work in the WUI through our use of the Good Neighbor Authority, private forestry assistance, and other programs to accomplish coordinated fuels reduction work on state and private lands. We look forward to continuing to work with the Kootenai National Forest to improve conditions on all lands within the Wildland Urban Interface.

Sincerely,

A handwritten signature in blue ink that reads "Greg Poncin". The signature is fluid and cursive, with the first name "Greg" and last name "Poncin" clearly legible.

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

CC: Doug Turman, Libby Unit Manager, Stephen Kimball, Local Government Forest Advisor