

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION
MILES CITY



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Ron Hecker, District Ranger
Ashland Ranger District
P.O. Box 168
Ashland, MT 59003

Re: Montana Department of Natural Resources and Conservation, Comments on the South Otter Project Proposed Action

Dear Mr. Hecker,

Thank you for the opportunity to comment on the Proposed Action for the South Otter Landscape Restoration and Resiliency Project. The Department of Natural Resources and Conservation (DNRC) manages State Trust Lands in this area and assists private landowners in the area with treatments on their lands. DNRC has fire protection interests in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

The South Otter project is a landscape-scale project that tiers to the 2014 Ashland Post Fire Landscape Assessment and the 2020 Custer Gallatin Forest Plan revision. The project area includes about 293,500 acres south from Highway 212 to the south boundary of the Ashland Ranger District. There have been substantial wildfires in this area, particularly between 1988 and 2012. The vegetation and habitat conditions have been altered by past fires as well as by fire suppression and past management. The project area has an overabundance of middle to small tree classes and a shortage of large diameter trees. Areas within past fires contain patches that are understocked with trees and reduced nesting habitat. Other forested areas contain overly dense stands that could support sustained crown fire and are susceptible to uncharacteristic wildfire insect and disease impacts.

There are private lands within the planning area and both state and private land parcels adjacent to the planning area. Portions of the areas proposed for treatment are within the Wildland Urban Interface (WUI) addressed by the Powder River and Rosebud Community Wildfire Protection Plans (CWPP's). This project is not only important for the national forest system lands but also for the state and private landowners in this area. Portions of the planning

area are mapped as Priority Areas for Focused Attention in the 2020 Montana Forest Action Plan due to risk for uncharacteristic wildfire.

DNRC supports the Purpose and Need for the project which includes: 1) improve diversity of vegetation to provide greater resiliency of ponderosa pine forests; 2) improve biological diversity and wildlife habitat; 3) reduce fuel loading in forested stands to enhance fire suppression capabilities; 4) reduce risk of large-scale uncharacteristic wildfire; 5) protect communities from wildfire; and 6) provide for local jobs, services, and products.

DNRC supports the treatments included in the Proposed Action. The proposed 293,000 acres of prescribed burning, 22,600 acres of commercial thinning, 4,655 acres of improvement cuts, 15,000 acres of pre-commercial thinning, and 20,000 acres of reforestation would significantly improve forest conditions and reduce hazards on this landscape. The 27,315 acres of commercial treatments would provide wood products and jobs for local economies. The substantially large scale of the treatments proposed for 10-20 years of implementation align well with the goals and strategies in the State's Forest Action Plan and Forest in Focus initiative. The extensive vegetation treatments and prescribed burning will restore diversity of forest structure and vegetation. Restoring wildfire on the landscape at the scale proposed is necessary in this fire-adapted ecosystem. The reforestation will re-establish desired levels of tree stocking in areas of past fires that lack seed sources.

Scheduling and design of the treatments on national forest lands should be coordinated with treatments planned on state and private lands. In the Environmental Assessment please include the number of acres of state and private lands within and adjacent to the planning area and address the potential for cross-boundary treatments. For implementation of this project we encourage you to consider the use of Good Neighbor Authority (GNA) which retains revenue from timber removed to help fund additional restoration. We have a growing Good Neighbor Authority (GNA) Program and will be working with you to consider opportunities for GNA projects during implementation

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 assist private landowners in the area with treatments on their lands. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.

Sincerely,



Chris Pileski, Area Manager, Eastern Land Office
MT Department of Natural Resources and Conservation

CC: Stephen Kimball- Local Government Forest Advisor