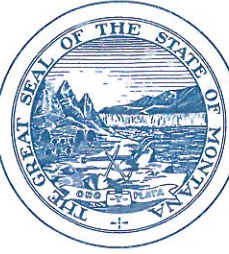


DEPARTMENT OF NATURAL  
RESOURCES AND CONSERVATION  
CENTRAL LAND OFFICE



GREG GIANFORTE, GOVERNOR

STATE OF MONTANA

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8001 NORTH MONTANA AVE  
HELENA, MONTANA 59602-9388

March 8, 2021

William Avey, Forest Supervisor  
Helena-Lewis and Clark National Forest  
2880 Skyway Drive  
Helena, MT 59602

Re: Montana Department of Natural Resources and Conservation, Support for the Middleman Project  
Draft Decision and Request for Interested Party Status.

Dear Mr. Avey,

The Montana Department of Natural Resources and Conservation (DNRC) strongly supports the Draft Decision for the Middleman Project.

DNRC has fire protection interests and manages State trust Lands in the 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 area is northeast of Helena in the Northern Big Belt Mountains. The project is not only important for the national forest system lands but also for private landowners in the area. Approximately 5 % of the project area (7,308 acres) is in private ownership. About 46% of the project area is designated as Wildland Urban Interface (WUI). The majority of the project area is ranked as moderate to high or higher for wildfire risk in the Tri-County and Meagher County Community Wildfire Protection Plans (CWPP's). Portions of the project area have been identified as Priority Areas for Focused Attention in the Montana Forest Action Plan due to high risk for impacts from wildfire.

DNRC supports the purpose and need for the project which includes improving conditions for public and firefighter safety, maintaining and enhancing ecosystem resiliency, maintaining and improving water quality and aquatic habitat, improving forage for wildlife and cattle, and providing wood products for local economies. DNRC supports the vegetation treatments in the Modified Proposed Action (Alternative 2) as the minimal work needed to achieve the desired project's purpose and need. About 53,131 acres of treatments are proposed, including 6,669 acres of commercial timber harvest and 49,934 acres of prescribed burning. This scale of treatment is appropriate for returning fire's role in the ecosystem and restoring the vegetation composition and structure towards the natural range of variability. This will reduce the risk of severe impacts to uncharacteristic wildfire, insects, and disease. The project will provide wood and jobs for Montana's forest industry and contribute to local economies.

Because of our strong interest, DNRC is requesting to remain an “interested party” regarding all objections to the Draft Decision. If changes requested by another party present the potential to reduce the ability to meet wildfire risk and forest health goals, or adversely affect DNRC’s fire protection of state and private lands, DNRC requests participation in objection resolution discussions.

DNRC is committed to continuing a positive working relationship with the Helena-Lewis and Clark National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. Our agencies have signed the DNRC – Helena Lewis and Clark NF Good Neighbor Authority (GNA) agreement to provide capacity to increase the pace and scale of restoration across boundaries. DNRC also 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,

A handwritten signature in blue ink that reads "Hoyt Richards". The signature is written in a cursive, flowing style.

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

CC: Northern Region Objection Reviewing Officer; Heidi Crum- Helena Unit Manager; Stephen Kimball- Local Government Forest Advisor