June 10, 2021

Stephen Brown, District Ranger

Stevensville Ranger District

88 Main Street

Stevensville, MT 59870

Re: Montana Department of Resources and Conservation, Comments on Proposed Action for the Eastside Forest, and Habitat Improvement Project

Dear Mr. Brown,

Thank you for the opportunity to comment on the Proposed Action for the Eastside Forest and Habitat Improvement Project. The Montana Department of Natural Resources (DNRC) has fire protection interests in this area and manages State Trust Lands in the vicinity. Our agencies share the common goals of reducing fire risk and improving forest health in Montana’s forest landscapes. The Eastside Project presents an important opportunity to return fire and increase vegetation diversity over a large landscape on the eastern portion of the Bitterroot National Forest. Past fire suppression and management has resulted in dense, homogenous stands in warm-dry forest types that are currently at high risk to uncharacteristic wildfire and insect and disease outbreaks. This project would help return this landscape to a disturbance regime resembling historic conditions and greatly improve forest resiliency and habitat. Much of the project area is within Priority Areas for Focused Attention in the Montana Forest Action Plan due to wildfire risk and forest health issues. DNRC shares interest in improving conditions and reducing risk in this area and strongly supports development of this project.

DNRC supports the Purpose and Need for the project which includes: improve resilience to insect and disease and wildfire impacts by modifying forest structure and composition and fuels; reduce fuel loading to set up future prescribed burning; increase the mosaic nature of vegetation regrowth in previous burned areas; improve forage quality and quantity in high potential elk habitat and elk winter range; and reduce conifer encroachment in meadows and grasslands to improve habitat. There is a strong need to strategically implement vegetation and fuels treatments in the planning area to improve habitat, reduce potential for uncharacteristic wildfires, enable safe and successful fire suppression, reduce wildfire risk to communities, and restore the ecological role of fire on the landscape.

DNRC supports the prescribed burning and non-commercial thinning proposed for this project. However, these non-commercial treatments would not alter the vegetation extensively enough to fully meet the purpose and need stated for this project. Additional treatments with removal of larger trees will be needed to provide conditions that reduce intensity of fire, protect firefighters and communities, and safely re-introduce fire through prescribed burning. This proposal could be considered a start to be followed by additional commercial treatments during the project timeframe. Further analysis and documentation should be clear that additional treatments will be planned to meet the purpose and need.

We are concerned that the large amount of non-commercial work proposed will be difficult to fund without offsetting value from commercial treatments. Also, there may be potential for the high number of non-commercial acres treated to constrain the number of acres of large stand treatments due to watershed and habitat effects.

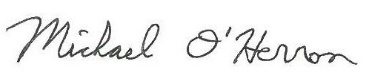
DNRC commends the development of this project in conjunction with the Confederated Salish and Kootenai Tribes (CSKT). It will greatly benefit the project to tap into the vast experience of CSKT with prescribed burning and their cultural values in this area. We urge you to engage with DNRC and other stakeholders in developing implementation details such as priority treatment locations, timing, and design features.

DNRC supports the use of the appropriate Categorical Exclusion to analyze this project. The analysis should identify the approximate number of acres to be treated and the timeframes for the treatments. Also describe the follow-up treatments that will be needed to maintain and further improve vegetation diversity in this area. Also, please address whether mechanical equipment will be used for some of the non-commercial thinning and if there will be opportunities for biomass utilization with the project.

In implementing this project consider how the treatments will be coordinated with treatments on state and private lands in the area. DNRC has programs to support work on private lands as well as a Good Neighbor Authority agreement that could potentially provide capacity to assist with implementation of this project.

DNRC is committed to continuing a positive working relationship with the Bitterroot National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. 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,



Mike O’Herron

Area Manager, Southwestern Land Office

Montana Department of Natural Resources and Conservation

Cc: Thayer Jacques, Unit Forester; Stephen Kimball, Local Government Forest Advisor