

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Northwestern Land Office

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May 10, 2021

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

Re: Montana Department of Natural Resources and Conservation, Comments on Pinkham Meadow Project and Request for Interested Party Status

Dear Mr. Benson,

Thank you for the opportunity to comment during the Objection Period of the Pinkham Meadow Vegetation Management and Fuels Reduction Project. The Department of Natural Resources and Conservation (DNRC) is writing to support your Draft Decision Notice and is not submitting a formal objection.

Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana. We see this project as necessary to achieve our shared stewardship goals for improving forest health and reducing fire risk across Montana's forested landscapes. The DNRC is an advocate for active management that provides long-term benefits to forest health and protection for adjoining lands and communities. DNRC understands that our local timber industry provides a vital service by accomplishing important management projects, supplying wood products, and contributing to local economic stability. Community safety, forest restoration and industry retention are key components of Forest and Focus 2.0 and the Montana Forest Action Plan. We believe the Pinkham Meadow Project embodies many of our shared objectives.

The DNRC supports the project purpose of promoting resilient vegetation conditions through treatments to move vegetation patterns, structure, fuel loading, and species composition towards desired conditions. The planning area includes 69,964 acres on national forest lands of which 54,098 acres are in the wildland urban interface (WUI) of Eureka, Trego and Fortine. This project is not only important for the national forest system lands, but also for private landowners and DNRC, which manages Trust Lands in the area. The Montana Forest Action Plan highlights a large percentage of the Pinkham Meadow treatment acres as priority areas for focused attention due to fire risk and forest health concerns. There are significant values at risk within the project area and we believe it is critical to reduce the dense tree stocking and high fuel loading to reduce intense

fire behavior and facilitate safe wildland fire operations.

DNRC has been working with the Kootenai National Forest, Lincoln County, and other parties to implement a Shared Stewardship Initiative to tackle wildfire risk within the Wildland Urban Interface (WUI). DNRC, the Kootenai National Forest, USDA Natural Resource Conservation Service, and Lincoln County have signed a Memorandum of Understanding to increase pace and scale of WUI treatments through joint planning and resource sharing to achieve landscape community protections. The Montana Statewide Assessment of Forest Conditions determined that Lincoln County held the most priority areas for focused attention in the state. The Pinkham Meadow Project aligns with Forest Action Plan priorities and goals for addressing forest health and wildfire threats. To further our unified mission, utilization of the Good Neighbor Authority is planned to implement a portion of the Pinkham Meadow Vegetation Management and Fuels Reduction Project in fiscal year 2022 and will combine Forest Service and State resources to accomplish critical work under the Shared Stewardship Initiative.

DNRC supports the treatments in the Modified Proposed Action Alternative for this project. The proposed 22,848 acres of vegetation treatments will effectively meet the purpose and need of the project including moving vegetation conditions towards desired landscape patterns, structure, fuel loading, and species composition. The transportation system adjustments are appropriate and will facilitate future management and resource protection.

As you finalize your decision, we encourage you to consider addressing the following in more detail:

- The consequences of selecting no action for this project would continue the current risk of severe impacts to communities and habitats through uncharacteristic wildfire and insect and disease events. With climate change and impaired vegetation conditions we can anticipate large stand replacing fires in the future which will threaten public and firefighter safety and severely impact values in the WUI and important resources in this area. The decision and analysis should highlight how the consequences of no action point to the essential need for action.
- The ecological and social importance of old growth warrants more explanation of the approaches considered and rationale for the treatments selected for the 1,281 acres of old growth stands in the project area. The draft decision mentions the overall need and that stands treated would retain minimum old growth characteristics, per Green et al. It would be beneficial to include more on the assessments made to evaluate risks of impacts to individual old growth stands given their location in the landscape, alternatives that were considered for these stands including no treatment, and the rationale for treatments selected in the decision. More information would highlight the full consideration given to approaches to retaining legacy old growth in the project area.

We appreciate the opportunity to provide comments on the Pinkham Meadow Vegetation Management and Fuels Reduction Project. 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. 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.

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.

We look forward to this project moving forward and utilizing partnership tools during implementation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Poncin".

Greg Poncin
Area Manager, Northwestern Land Office
MT Department of Natural Resources and Conservation
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CC: Doug Turman, Libby Unit Manager; Stephen Kimball, Local Government Forest Advisor;
Jodi Turk, Federal Engagement Forester;
Northern Region Objection Reviewing Officer