Skip Kowalski

May 20, 2022

Matt Anderson

Forest Supervisor, Bitterroot National Forest

Hamilton, MT. 59840

Dear Matt:

Thank you for the opportunity to provide comments to scoping for the Bitterroot Front Project. This proposal has the potential to both restore the forest ecosystem to more properly functioning (pre white settlement) conditions and help reduce the threats of wildfire to life and private property in the Bitterroot Valley. Done properly, this project not only can demonstrate how forest projects can achieve restoration and public safety goals, but also has the potential to identify the breadth and total cost of conducting the complete job of forest restoration. Please use the existing favorable political climate, recent policy and legislation changes and projected availability of funding to show how all of these goals can be achieved.

**Background and Context**

The Bitterroot Forest has an important and relevant history regarding the management of National Forest System lands. The Bitterroot National Forest made national headlines in the 1960’s with the “Bitterroot Controversy” that culminated in the passage of the National Forest Management Act (NFMA). The Forest helped initiate getting scientist more involvement in National Forest management with Bitterroot Ecosystem Management Research Project (BEMRP). For decades local interest groups have demanded different things from our National Forests and they, through public participation and litigation, keep the Bitterroot Forest in the public eye.

The Bitterroot Valley is currently experiencing some of the most rapid development in the Wildland Urban Interface (WUI) and local communities have some of the greatest risk from damaging wildfires in western Montana. Much of this fire risk is the result of past forest management and fire suppression policies. This project not only has the potential to reduce some of the short-term fire risk concerns, but also has the potential to reduce long-term fire risk by restoring vegetation patch size, pattern and distribution across the landscape to conditions that permit fires to operate more favorably through more normal (natural) disturbance regimes. It would be disappointing not to capitalize on these rare, but favorable, political, legislative and funding opportunities.

**Recommendations:**

1. Develop project objectives that replace stand based prescriptions with hierarchical based prescriptions that start at the local landscape level and become more refined at the successional patch and tree neighborhood scales as recommended by Hessburg et al (2015).
2. Use discrete geographic areas to define landscapes for the Bitterroot Front Project. Using the Opportunity Areas or aggregations of adjacent Opportunity Areas as identified in your scoping documents would be a good place to start.
3. Set objectives for vegetation patch size, species composition, age-class distribution and pattern to approximate conditions within the Range of Natural variation (RNV) and that which would have been expected to exist prior to European settlement.
4. When setting landscape objectives, also give high priority to creating vegetation conditions that account for improving fire fighter safety and provide habitat linkages and corridors for wildlife movement at multiple spatial scales.
5. Stage project implementation so that large areas are relatively free of human disturbance across the Bitterroot Front through time.
6. Use the seven core principles of Hessburg et al (2015), especially providing large old legacy trees, when restoring fire prone (ponderosa pine and mixed conifer) landscapes.
7. Use the I C O (Individual, Clump and Openings) approach from Churchill et al (2013) when prescribing management for stands and aggregations of stands.
8. Develop a comprehensive monitoring program to aid in achieving the goals of “Adaptive Management” and to modify future projects based on lessons learned. Use “A Technical Guide for Monitoring Wildlife Habitat” (Rowland and Vojta 2013) as a source for developing your Monitoring Plan.
9. In anticipation of climate change, plan reforestation and restoration actions with a changing climate in mind.
10. Do not count on this project achieving the complete job of protecting investments and private property from wildfire. Use any leverage that you have to encourage private land owners and county government to do their share in protecting private property from wildfire and not wasting the investments made by American tax payers.

Thank you for the opportunity to comment.

Skip Kowalski

Stevensville, MT

Literature Cited

Churchill, D.J., A.J. Larson, S.M.A. Jeronimo, M.C. Dahlgreen, and J.F. Franklin. 2013. The ICO approach to quantifying and restoring forest spatial pattern: Implementation guide. Version 2.0. Stewardship Forestry, Vashon, Washington, USA.

Hessburg et. al. 2015. Restoring fire-prone Inland Pacific landscapes: seven core principles. Landscape Ecol (2015) 30:1805–1835.

Rowland, Mary M. and Christina D. Vojta. 2013. A Technical Guide for Monitoring Wildlife Habitat. United States Department of Agriculture, Forest Service Gen. Tech. Report WO-89.