

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Southwestern Land Office • Missoula Unit

3206 Maverick Lane, Missoula, MT 59804 Phone: (406) 542-4201 Fax: (406) 542-5807



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

## STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074  
FAX: (406) 444-2684

PO BOX 201601  
HELENA, MONTANA 59620-1601

May 20, 2022

Steve Brown, District Ranger  
Stevensville Ranger District  
88 Main Street  
Stevensville, MT 59870

Re: Comments on Bitterroot Front Project Proposed Action

Dear Mr. Brown,

Thank you for the opportunity to comment on the proposed action for the Bitterroot Front Project. The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands in the area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes.

The Bitterroot Front Project represents a critical opportunity to return fire and increase vegetation diversity over a large landscape on the eastern face of the Bitterroot Range. Past fire suppression and management have resulted in dense, homogenous stands in warm-dry forests that are currently at high risk to uncharacteristic wildfire and insect and disease outbreaks.

Fires igniting near the planning area can threaten state and private lands and Communities at Risk, including Florence, Stevensville, Victor, Pinedale, Victor, Corvallis, Hamilton, Darby, and Conner. A study by Headwaters Economics notes that Ravalli County is ranked in the 100 percent profile for risk to homes and likelihood of wildfires. This ranking means that Ravalli County has the greatest wildfire risk of all counties in Montana. A large portion of the planning area falls within designated Community Protection Zone (CPZ) and Wildland Urban Interface (WUI). These are areas where communities are at risk to wildfire and are a priority for reducing hazardous fuels when heavy fuel loads are present. Since 1990, over 7,000 new homes have been built into the wildfire hazard areas in Ravalli county, and growth is continuing. The area is located east (downwind) of the Frank Church-River of No Return Wilderness which receives frequent lightning-ignited fires. Risk of large scale, uncharacteristic wildfire and the potential impact to residents is high. The project area is within Priority Areas for Focused Attention in the Montana Forest Action Plan due to risk to wildfire and forest health impacts. The Montana Wildfire Risk Assessment (MWRA) shows the project area is among the highest wildfire risk areas in the state.

DNRC supports the objectives for the project which include: 1) Reduce fuels; 2) Improve landscape resilience to disturbances by modifying forest structure and composition; 3) Improve wildlife habitat; and 4) Contribute to the local economy and forest products industry through fuels reduction activities and timber production. The objectives align well with the Montana Forest Action Plan, reflect the departure of this area from historical conditions, and point to the critical need for active management in these landscapes, including the return of fire.

Effective use of prescribed fire will require vegetation treatments that modify within-stand structure by removing small trees and reducing surface and ladder fuels, while retaining large, more fire-resistant trees and variable stand structure such as dead and down logs and diverse habitat inclusions.

We strongly support Objective 4 that highlights the importance of the local economy and timber industry. Implementation of restoration projects in this area will provide jobs and revenue for local communities. Future restoration will require a strong, sustained timber industry.

We are pleased to see the partnership with the Confederated Salish and Kootenai Tribes (CSKT). The CSKT brings strong skills with prescribed burning connected to centuries of cultural practice. The experience and skills of the tribal fire managers will be an asset in the planning and implementation of this project. Ravalli County has expressed interest in contributing as a Cooperating Agency for this project. We encourage the Forest to provide this designation and take advantage of local government expertise. County commissioners and staff have strong local perspective of forest conditions and issues, and can help communicate, facilitate, and collaborate for better preparation and outcomes.

As you further develop the project and complete analysis please consider the following:

1. Landscape Treatment Strategy: include information on the broad scale strategy for restoring a diverse mosaic of vegetation in the planning area. In the Proposed Action Alternative include information on the location and spatial design of treatments, including where they will be most effective in meeting landscape goals. Include enough specificity to describe alternatives and analyze effects. Include an implementation plan that describes how information to be collected and how treatments will be further designed or adjusted based on information collected in implementation. Describe how partners and the public will be involved in implementation. The Mid-Swan project on the Flathead National Forest is a good model for designing and analyzing treatments in a landscape level plan.
2. Connecting Landscape Treatments with Community Protection Activities: Be clear about the distinct role this project has with regard to the national Cohesive Strategy- how landscape treatments on national forest will connect with work by private landowners, including work in the home ignition zone. The Forest Service's work to reduce stand densities and return fire to the landscape will restore vegetation diversity, habitat quality, and ecological functionality. It will also contribute to community protection by increasing options for safely managing fires threatening the community. Safely restoring fire to this landscape will require actions by private landowners and homeowners to increase the resilience of the built community. For NEPA, it is appropriate for this project to focus narrowly on activities on national forest lands. However, the connectivity of this project with other cross-boundary activities is important for understanding the overall purpose and context of this project.
3. Fuel Breaks: Shaded fuel breaks are being recognized as a key strategy for community protection and ingress-egress for wildfires in western Montana. These can provide areas where fire drops to the ground for suppression purposes. They can be used as anchor areas for burning-out to provide lines of defense near communities. We encourage you to work with the Fire in the Root group and local fire departments to plan shaded fuel breaks in key locations with this project.
4. Treatments in Inventoried Roadless Areas: With over 13,000 acres of potential commercial harvest identified in Inventoried Roadless Areas, ensure the cutting and removal of small trees follows the Roadless Rule exceptions. A recent court ruling on the Elk Smith project provides legal interpretation of the Roadless Rule exceptions regarding cutting and removal of small trees.
5. Effects Analysis: Include the effects of the No Action Alternative, including continued risk and impacts of uncharacteristic stand-replacing wildfires and insect and disease outbreaks.
6. Project-Specific Forest Plan Amendments: We support the proposed project-specific amendments for elk habitat and old growth, coarse woody debris, and snags. There is new science on these components that

should be used to modify forest plan requirements for this project.

7. Climate Change: Climate modeling indicates the future will bring a higher frequency of severe fire seasons with extensive forested area burned across the western U.S. There is high potential for significant loss of forest cover and habitat, watershed, community values, and carbon sequestration and storage due to uncharacteristic large scale, stand-replacing fires. A key strategy in the Montana Climate Solutions Plan (2020) is to implement active management across ownership boundaries to reduce wildfire risk and sustain watershed functions. The project analysis should include the relative effects of alternatives with regard to carbon storage and sequestration, not just that in the overall global context these changes are negligible.

DNRC looks forward to working with the Bitterroot National Forest to further develop and implement this critical project. DNRC has programs to assist private landowners in the area with treatments on their lands. DNRC has an established Good Neighbor Authority (GNA) program which can add capacity for implementation and retain timber revenue to help fund additional restoration projects.

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