

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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GREG GIANFORTE, GOVERNOR

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## STATE OF MONTANA

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February 24, 2023

Ron Hecker, District Ranger  
Ashland Ranger District  
P.O. Box 168  
Ashland, MT 59003

Re: Montana Department of Natural Resources and Conservation, Comments on the South Otter Draft Decision Notice and Request for Interested Party Status for Objections

Dear Mr. Hecker,

Thank you for the opportunity to comment on the Draft Decision Notice for the South Otter Landscape Restoration and Resiliency Project. The project area encompassing 318,800 acres is located about six miles south of Ashland. There are approximately 292,000 acres of national forest lands and 26,000 acres of private lands within the planning area. The landscape has been heavily impacted by large wildfires since 1995, including fires with high severity and intensity in 2012. This project represents pro-active approach to addressing the wildfire crisis in this landscape and throughout the western United States.

Portions of the areas proposed for treatment are within the Wildland Urban Interface (WUI) addressed by the Powder River and Rosebud Community Wildfire Protection Plans (CWPP's). This project is not only important for the national forest system lands but also for the state and private landowners in this area. Portions of the planning area are identified as Priority Areas for Focused Attention in the 2020 Montana Forest Action Plan due to risk for uncharacteristic wildfire.

The Department of Natural Resources and Conservation (DNRC) manages State Trust Lands in this area and assists private landowners in the area with treatments on their lands. DNRC has fire protection interests in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana. DNRC previously commented on the Proposed Action for this project in February, 2021, and on the Draft Environmental Assessment in November, 2022.

DNRC supports the selection of the Proposed Action (Alternative 2) in the draft decision. This would authorize 11,165 acres of non-commercial thinning, 26,350 acres of commercial thinning, 34,940 acres of reforestation, and 184,150 acres of prescribed burning. The proposed large scale of treatments is necessary to meet the purpose and need for the project which includes: 1) restore ponderosa pine ecosystems; 2) reduce fuel loadings to enhance fire suppression capabilities; and 3) provide wood products to contribute to employment and industry in local communities and support a sustainable timber supply.

The proposed treatments align well with the goals and strategies in the State's Forest Action Plan. These treatments will restore diversity of forest structure and vegetation. Thinning forest stands and restoring wildfire on the landscape at the scale proposed is necessary in this fire-adapted ecosystem. The reforestation will re-establish desired levels of tree stocking in areas of past fires that lack seed sources.

DNRC has programs to assist private landowners in the area with treatments on their lands. We support the South Otter project as an important part of the cross-boundary work necessary to achieve our shared stewardship goals for improving forest health and reducing fire risk across Montana's forested landscapes.

DNRC looks forward to working with you in implementation of the project. Consider the use the Good Neighbor Authority (GNA) which will retain timber revenue to help fund additional restoration projects.

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 Custer Gallatin 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,



Chris Pileski, Area Manager, Eastern Land Office  
MT Department of Natural Resources and Conservation

CC: Objection Reviewing Officer, USDA Forest Service Northern Region  
Stephen Kimball- Local Government Forest Advisor