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Montana Fish, Wildlife and Parks
1420 East Sixth Ave
Helena, MT 59620
(406) 542-5500
05-08-2023

Helena-Lewis and Clark National Forest
2880 Skyway Drive
Helena, MT 59601
406-495-5201

RE: Helena-Lewis and Clark National Forest, Forest-wide Prescribed Fire Project

Dear Ms. Entwistle and Ms. Platt,

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the forest-wide prescribed fire project on the Helena-Lewis and Clark National Forest. As identified in the scoping letter, the proposed action will maintain and enhance wildlife habitat within the treatment areas, and we are generally supportive of these actions. Due to the forest-wide nature of the EA, specific comments relevant to wildlife and their habitat are difficult to provide until treatment areas have been identified. Therefore, we recommend collaborating with regional FWP staff during the development and design phase of individual projects as they progress. We can provide specific information at the local scale that will help to meet the goals of maintaining and enhancing wildlife habitat.

While FWP generally supports large scale vegetation management projects when needed, we do have the following comments and potential concerns related to the proposed project.

- Care should be taken with broad treatment of vegetation as fuels. Vegetation provides food, cover, and habitat to wildlife species among a host of other benefits. The proposal may benefit from species-specific fire effects analysis.
- One of the objectives for the project is to maintain and enhance wildlife habitat. Prior to implementation of activities in each Geographic Area Group, we are happy to provide specific recommendations to support the suite of wildlife benefits mentioned in this treatment proposal.
- While the scoping notice does not identify specific treatment sites, we would recommend item # 6 under the preliminary topics for implementation address specific benefits and impacts to the mosaic of wildlife habitats that exist within the scope of this project. An analysis of specific impacts to elk security, forage, and thermal cover would be helpful. We would also encourage seasonal closures to motorized routes beginning 9/1 to mitigate potential loss of elk security.
- It is ultimately up to the HLC to determine tree size-class focus based on their forest management goals and ecological considerations. While the small diameter size class may be outside the range of natural variation, the HLC may still prioritize it if it is an important component of the forest ecosystem, or if it poses a significant wildfire risk. Similarly, while areas

of medium-high and high-density small diameter trees may be important for elk and deer forage, the HLC may also consider other factors such as wildlife habitat diversity, forest health, and wildfire risk when making management decisions.

We recognize that the Helena-Lewis and Clark National Forest will need to balance multiple competing interests and considerations.

The proposed project area spans multiple FWP administrative regions, so please consider the following regional wildlife and non-game biologists as primary contacts:

Mike Ebinger, Blackfoot Wildlife Biologist, Region 2, michael.ebinger@mt.gov, 406-210-3479

Torrey Ritter, Non-game Wildlife Biologist, Region 2, torrey.ritter@mt.gov, 406-381-2339

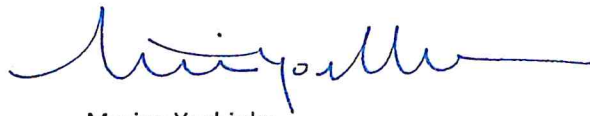
Adam Grove, Townsend Wildlife Biologist, Region 3, adgrove@mt.gov, 406-266-3367

Thank you for the opportunity to comment, and we look forward to working with you.

Sincerely,



Randy Arnold
Region 2 Supervisor



Marina Yoshioka
Region 3 Supervisor