

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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June 16, 2023

Tim Lahey, District Ranger
Butte Ranger District
1820 Meadowlark
Butte, MT 59701

Re: Montana Department of Resources and Conservation, Comments on the Draft
Environmental Assessment for the Basin Creek-Butte Watershed Project

Dear Mr. Lahey:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Basin Creek-Butte Watershed Project. The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands within and near the project area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. Management of the national forest lands affect conditions and outcomes on nearby state and private lands.

The purpose of this project is to reduce the risk of impacts of severe wildfire to the Basin Creek reservoirs which supply 60% of the water supply of Butte. The hazardous fuels loading in the Basin Creek Watershed is extreme. Mountain Pine Beetle infestations have resulted in high concentrations of dead, down, and jack-strawed trees intermixed with green tree ladder fuels. The Butte-Silver Bow City-County Commissioners have declared the situation an Emergency due to the high risk of wildfire severely impacting the City's water supply. This project is a statewide priority for DNRC. The Montana Forest Action Plan calls for prioritizing projects that protect municipal watersheds.

DNRC has been supporting Butte-Silver Bow County with grant funds for treating their lands along the reservoirs. DNRC has been providing the Forest Service with technical assistance for planning of this project

DNRC supports the proposed action which includes 2,350 acres of salvage, thinning, pile burning, and shaded fuel breaks to reduce fuels and improve forest composition and structure to protect the watershed. The proposed treatments will work together with the 34 acres of treatments completed and 100 acres planned on Butte-Silver Bow County lands along the reservoir. DNRC is assisting the county to prepare and administer these projects through the use of state and federal grant programs.

A sentence on page 11 of the EA summarizes how the treatments will meet the project purpose: *“The proposed vegetation treatments will substantially alter fire behavior within the watershed by reducing the risk of a crown fire, reducing flame length and altering tree structure and composition to the point where fire crews have a vastly improved chance of successfully attacking wildfire within the watershed.”*

DNRC supports the proposed treatments in the Inventoried Roadless Area, including the proposed shaded fuel break. The proposed action is entirely consistent with the Roadless Rule.

Overall the Draft EA is clear and accurate. However, we offer a few suggestions for strengthening the final EA:

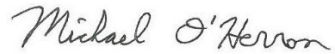
- 1) In “Why Are We Proposing This Project” mention the 2022 Emergency Declaration by Butte-Silver Bow City-County.
- 2) The soils analysis should directly address how the Proposed Action alternative meets the Forest Plan standard requiring that damage is unlikely and soil goals and objectives are met when ground-based yarding occurs on slopes greater than 35%.
- 3) The effects on soils and hydrology should provide more details of the expected impacts of severe wildfire with no fuels reduction. The threat of severe erosion and water quality impacts with these hydrophobic soils following wildfire is the basis for the project purpose so should have a more in-depth discussion of the projected impacts to the soils, reservoir water, and municipal water.
- 4) In the Effects of No Action expand the discussion to discuss the likelihood of an ignition in the planning area growing to a large scale fire that would impact areas beyond the planning area. With the current fuels conditions and suppression difficulty it is likely that a wildfire would expand to a much broader area, possibly threatening private property near or within Butte

DNRC strongly concurs with the statements in the EA about how this project increases resilience of forests to climate-related environmental changes. The treatments proposed would greatly reduce the risk of emissions and carbon loss from a large, stand replacing wildfire. The widespread loss of forest cover through severe wildfires is the greatest threat to loss of the extensive carbon stored and sequestered in western forests. The best strategy for adapting landscapes is to actively manage forest vegetation for reduced tree density and diverse structure and composition. A mosaic of diverse stands will accommodate returning fire to the landscape through prescribed burning and allow for safe and effective management of wildfires to reduce severity and scale of impacts. Healthy, vigorous forests capture carbon rapidly, in great capacity and for long periods of time storing it in tree stems, leaves, branches, roots, and soil. Also, wood harvested and developed into durable products are reservoirs of long-term carbon storage.

DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing restoration projects on the Beaverhead-Deerlodge National Forest. The GNA program has capacity to assist with implementation of this project.

DNRC is committed to continuing our positive working relationship with the Beaverhead-Deerlodge 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,

A handwritten signature in cursive script that reads "Michael O'Herron".

Mike O'Herron
Area Manager, Southwestern Land Office
Montana Department of Natural Resources and Conservation

Cc: Brian Robbins, Anaconda Unit Manager; Stephen Kimball, Local Government Forest Advisor |