September 13, 2023

Emmet Pruss, Team Leader, Rye Creek Project

Bitterroot National Forest

1801 N. 1st St,.

Hamilton, MT 59840

Re: Comments on Rye CreekFuel Break Project Proposed Action

Dear Mr. Pruss:

Thank you for the opportunity to comment on the Proposed Action for the Rye Creek Fuel BreakProject. 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 project would create and maintain fuel breaks in Rye Creek area and the nearby communities of Charlos Heights, Como, Darby, and Conner. The purpose of the projects is to pre-treat fuels along existing roads in strategic locations to reduce the spread and intensity of wildfire. This will reduce the risk to first responders and raise the probability of success during direct and indirect engagement on wildfires. Providing fuel breaks in advance of wildfire emergencies represents a pro-active approach to protecting communities and landscapes from the impacts of uncharacteristic wildfires that are occurring more frequently with changing climate.

The growing number, size, and intensity of wildfires in Montana points to an urgency for action to prepare for wildfire in advance of emergencies. This also provides a more environmentally-sound approach to this action than is possible during the emergency of an actual wildfire.

DNRC supports the proposed action which includes the use of mechanical and hand thinning and prescribed burning treatments to create shaded fuel breaks along existing roads in strategic locations. The treatments would be primarily within and adjacent to the Wildland Urban Interface (WUI) identified in the Ravalli County Community Wildfire Protection Plan (CWPP). Approximately 1,886acres will be treated along about 24 miles of roads of which 95 % were affected by wildfires in 2000. Both commercial and non-commercial treatments may be used. The outcome of the treatments will be reduced ladder fuels and tree densities up to 1,000 feet in width along strategic existing roads.

The treatments will facilitate fire remaining near the ground and not spreading through the trees as a crown fire. This will create areas that are advantageous and safe for firefighters to take a stand against a progressing wildfire. An added benefit is increased spacing between trees to maintain or improve forest health, tree growth, and desired species composition.

We urge you to consider ways to utilize residual wood material from this project. With roadside treatments there may be interest in firewood, posts and poles, or other products.

Following treatments, the fuel breaks should be evaluated for effectiveness in meeting the purpose. DNRC would like to be invited to the post-treatment evaluation.

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 management and restoration, benefiting the missions of both agencies.

Sincerely,



Mike O’Herron

Area Manager, Southwestern Land Office

Montana Department of Natural Resources and Conservation

CC: Thayer Jacques, Unit Forester; Steve Kimball, Local Government Forest Advisor