September 13, 2023

Emily Platt, Forest Supervisor

Helena-Lewis & Clark National Forest

2880 Skyway Drive

Helena, MT 59602

Re: Comments on South Fork JudithFuel Break Project Proposed Action

Dear Ms. Platt:

Thank you for the opportunity to comment on the Proposed Action for the South Fork JudithFuel 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. In fact DNRC plans a similar fuel reduction project on state school trust land located immediately adjacent to the northern boundary of the proposed project.

The South Fork Judith Project would create a 2,996-acre fuels break to address hazardous fuel conditions adjacent to roads in the South Fork Judith River, Hay Canyon, Indian Hill, Dry Pole, High Spring Creek, Burley Peak, and Circle Park areas and the nearby communities of Neihart, Sapphire Village, and Checkerboard, Montana. The fuel break would be designed to modify fire behavior in the wildland urban interface, specifically around the Trask Ranch properties and the emergency ingress/egress corridor. This area is identified in the Judith Basin County Wildfire Community Protection Plan. We appreciate that the district has collaborated with the Trask Ranch homeowners, Judith Basin County commissioners, and the Judith Basin Disaster and Emergency Services coordinator.

This project 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 non-commercial mechanical and hand thinning and prescribed burning treatments to create shaded fuel breaks along existing roads and trails in these strategic locations.

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 Helena-Lewis & Clark 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,

Clive Rooney, Area Manager, Northeastern Land Office

Montana Department of Natural Resources and Conservation

CC: Steve Kimball, Local Government Forest Advisor