Ravalli County Collaborative

Ravalli County Montana

215 S. 4TH STREET SUITE A
HAMILTON, MT 59840

September 11, 2023

Matt Anderson, Forest Supervisor
Bitterroot National Forest
1801 N. First Street, Hamilton, MT 59840

Ref: August 2023 Environmental Assessment (EA) for the Bitterroot Front Project

Dear Matt,

The Ravalli County Collaborative (RCC) has reviewed the August 2023 Environmental Assessment (EA) for the Bitterroot Front Project on the Bitterroot National Forest (BNF) and is hereby providing comments specific to this proposed project. It should be noted that the RCC has been involved in the development of the Bitterroot Front Project and has submitted comment letters previously on 11/09/20, 6/21/21, 8/09/21, and 10/12/21.

> *The Ravalli County Collaborative is a diverse group of volunteers appointed by the Board of Ravalli County Commissioners whose adopted mission is to promote the wise use and management of public natural resources by local, state, and federal agencies within Ravalli County. The RCC employs a collaborative forum for reviewing and developing natural resource actions and policies that affect our community.*
>
> *Mission Statement RCC Bylaws 2020*

I. Purpose and Need

a. Current conditions

The history as written in the EA was complete and accurate.

The Forest Service has determined that the BNF contains five of the western United States top 250 areas with communities at high risk from wildfire. Four of these are in the Bitterroot Front project area. The Montana State Forest Action Plan identified the Bitterroot Front as having high fire risk to local communities. Six of the top ten at risk communities in Montana are in Ravalli County. In addition, an analysis of fire behavior based on applying fire behavior models to existing vegetation in the project area showed that the forest is at extreme risk of a catastrophic fire.

Modeling results showed significant departures from historical fire regimes and vegetation condition classes and indicated conditions likely leading to excessive flame length and increased crown fire activity. The recent Roaring Lion and Lolo Peak fires illustrate the reality of the dangerous situation on the Bitterroot Front. ***The RCC supports the need for treatment to reduce fire risk.***

Because model predictions are extremely sensitive to inputs, the RCC suggests that the EA describe the vegetation data that were used in the modeling exercise. Some indication of model validity should also be provided. This would strengthen belief in the outputs.

The RCC recognizes the vulnerability of private property in Ravalli County, Montana, to catastrophic wildfire and therefore supports the intent for more aggressive and timely forest management. Furthermore, the RCC supports the foundational premise that these publicly owned forests require management whether it be direct vegetative manipulation or simply long term monitoring. Such forest management must be carefully designed and implemented using best science and adaptive management. Forest conditions vary widely across the BNF and therefore management treatments must take into account differing ecosystems, vegetative communities, recreational uses, fish and wildlife habitats, and past forest events and the vegetation and fuels condition on adjacent private lands. Perhaps most challenging is the necessity to anticipate what forest resources and products the BNF should provide in the future. These are essential and complex considerations. Support for BNF forest management must include the involvement of the public in land use/management planning and implementation. ***The RCC stands with the BNF to help design appropriate forest management treatments and garner public support for BNF actions.***

The scope of the proposed EA may be intimidating to many publics. The RCC recognizes that the large project area is indicative of the large need for action. The details of such a large endeavor can be more easily consumed if taken in smaller portions. For example, while the proposed EA indicates a very large project area of 143,340 acres, the RCC recognizes that actual forest treatments are proposed in relatively small portions of that project boundary and implementation will take many years. For example, the EA proposes 27,477 acres of commercial harvest which represents only 19.2% of the total project area.

The RCC further acknowledges and supports that timber harvest is an appropriate product of the BNF and that carefully designed and implemented timber harvest can benefit forest health, maintain, or improve wildlife habitat, and enable valued recreation.

b. Priority areas

It was not clear how the priority areas were determined. Were they identified from an operational perspective, which is fine, or were outputs from the fire models and previous analyses also used? ***Please clarify how priority areas were determined.***

The RCC would like to be involved in prioritizing the annual implementation plan.

II. Proposed Action

a. Objectives

The purpose of the Bitterroot Front Project was narrowed, due to the Emergency Authorization, to focus primarily on actions reducing fire risk to local communities. Fire risk would be reduced by altering stand structure and density via harvesting and thinning and by introducing prescribed fire. Secondary benefits would include increased resistance to insect and disease outbreaks, increased safety for first responders, and greater success in fighting future fires in the area. ***The RCC supports the focus on fuel reduction due to the urgency of the situation. However, the RCC is disappointed that analysis of recreational needs along the Bitterroot Front had to be dropped due to the Emergency Declaration. Even though the analysis of the recreation resource issues and needs was dropped from this EA, the RCC urges the BNF to consider the impact to recreation uses and potential opportunities to enhance recreational trail infrastructure during the design and implementation of site-specific vegetation treatment and removal actions.***

b. Treatments: types and acres

Through manipulating inputs (canopy closure, canopy density, and tree height) to fire models, reliable predictions of flame length, intensity, and spread can be made for different forest stand structures. These results are then used by managers to identify

what activities are needed to bring actual stand structures closer to the desired condition, which reduces fire risk.

Standard vegetation treatments are proposed to achieve desired conditions, including commercial harvest, noncommercial thinning, prescribed burning, and slashing. Based on current conditions in the project area and the modeling results, estimates of acres by treatment type were produced. These are the maximum acres that could be treated. Actual acres may be less.

This approach of using models and data is widely used. However, the validity of the results depends on the reliability of the models and the quality/quantity of the data used to drive the models. ***This section would be strengthened by providing information on model reliability and data quality/quantity.***

The total treatment area is 138,280 acres. Of this total, 78% of the acres are in either whitebark pine restoration (26%), prescribed burning only (40%), or slashing and burning (13%). Commercial harvest covers slightly less than 20% of the treated acres. ***The RCC believes this mix of treatment types is appropriate for reducing fire risk on the Bitterroot Front.***

c. Implementation

1. Condition-based analysis, activity cards, and design features.

The condition-based approach is designed to avoid repeating analyses over many smaller individual projects. It essentially extracts the information from a variety of forestry texts, agency documents and rules, and decades of practical experience to create design features that link existing vegetation to each potential activity so that the desired outcome is achieved. This allows an initial determination of where and when a treatment could be applied over a large landscape without repeating an analysis at every location. This initial determination is based on coarse-scale data and prior field work. The final determination (silvicultural prescription) is made following on-the-ground measurements of specific conditions encountered during implementation.

If the underlying data are sufficient, the final determination of treatment could be fairly quick and straight forward, allowing managers to cover more ground more

quickly. In the event the conditions encountered are not appropriate for the initial determination, the design features and activity cards would allow for correction/modification to be made. This would provide for adaptive management and flexibility for managers.

The RCC believes the conditioned-based management approach will be successful to the extent the underlying data and models are reliable, that all steps in the process, including public participation, are closely followed and sufficient resources are allocated.

2. Implementation phases

In the EA, the project is to be initially implemented, by priority area, in four phases (years). However, the EA also states that it may take 20 years to secure the desired conditions. And in other places, it is stated that the time to complete a treatment is variable depending on conditions, manpower, and funding. ***There seems to be contradictory time frames stated between how much time the EA says will be needed for full implementation and the time frames dictated by the Emergency Declaration. This needs to be clarified. Will the Emergency Authorization be perpetual for the Bitterroot Front?***

3. Verification/project compliance

One of the most critical steps in the implementation phase is the verification of conditions justifying the initial treatment designation. The EA states that field surveys and consultation would be conducted to verify that the proposed action would be successful in moving toward the desired condition. If conditions are not consistent with the specified treatment, the surveys would be used to refine activity design elements; identify the need for additional mitigation measures; and result in a modification of the activity, location, or timing. A variety of checklists have been prepared to document this process.

The RCC looks forward to reviewing the annual implementation packets prepared prior to, or during, implementation. The RCC would be interested in observing the use of these packets during implementation.

4. Monitoring

It is critical that a robust, well defined, monitoring and documentation program be developed and applied to this condition-based approach. The EA describes the purposes of monitoring and documentation, all of which seem appropriate, but does not offer much detail on protocol. Regarding documentation and monitoring, the EA states, "The documentation method would be dependent on who is completing the work and could include sight inspections, photographs, and other relevant documentation." The documentation would then be the basis for "expert opinions" regarding the treatment success. ***The RCC would like to see a more rigorously defined documentation and monitoring plan. Such a plan needs to go beyond professional opinion and include information on sampling protocols, design, and statistical analysis and reliability disclosures.***

The RCC requests a discussion with the BNF regarding developing a citizen science monitoring program to address the questions: "Did the BNF do what they said they would do?" and, "Were BNF treatments effective and beneficial?"

For example, a citizen science monitoring program could be developed to help explain BNF forest conditions, management treatments as well as to document treatment results over time. This might include photo and/or video documentation as well as fish and wildlife surveys following strict BNF protocols.

In order to obtain public support for forest management treatments, the RCC recommends that the BNF commit to a well-funded monitoring program that provides annual monitoring reports specific to each forest treatment.

The effectiveness of BNF forest treatments should be in part be evaluated using management indicator species (MIS) chosen from the USDA R1 Threatened, Endangered, and Sensitive (TES) list and/or the Montana Natural Heritage Program's Species of Concern list.

III. Environmental Impacts

The RCC believes that no action will have significant negative consequences.

IV. Public Engagement

a. The EA uses several commonly used silvicultural terms that may be confusing and are not defined in the EA glossary. These include "stocked, overstocked, old growth, and mature" timber. ***All silvicultural terms used in this EA should be defined in the glossary.***

b. The RCC recommends the BNF develop a companion "Frequently Asked Questions (FAQ)" document to supplement the EA and aid the public's understanding and evaluation of the proposed project.

In conclusion, the RCC recognizes the enormity and urgency of the wildfire risk in Ravalli County, Montana. We support the purpose and need as expressed in the proposed Bitterroot Front EA. The RCC appreciates the hard work of BNF staff to assemble this EA. We stand ready to help support the proposed project and would like to work with the BNF to carefully implement and monitor forest treatments. Thank you for the opportunity to provide comments on this EA.

Sincerely,

ABSENT

Steve Schmidt, Co-Chair

Wayne Rusk

Wayne Rusk, Co-Chair