DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Northwestern Land Office
655 Timberwolf Pkwy., Suite 1, Kalispell, MT 59901 Phone: (406) 751-2240 Fax: (406) 751-2287

GREG GIANFORTE, GOVERNOR 1539 ELEVENTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074
FAX: (406) 444-2684

PO BOX 201601
HELENA, MONTANA 59620-1601

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Gary Blazejewski, Project Leader
Hungry Horse Ranger Station
P.O. Box 190340
Hungry Horse, MT 59919

Re: Montana Department of Natural Resources and Conservation, Comments on the Dry Riverside Project Environmental Assessment

Dear Mr. Blazejewski:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the Dry Riverside project. The project area is located south of Hungry Horse along the east side of the Hungry Horse Reservoir. There are strong ecological benefits of this project. The EA includes the comprehensive analysis needed to support a decision for this project.

Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests in the planning area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.

DNRC supports the purpose and need of the project which includes:

1) Improve the diversity and resilience of terrestrial ecosystems and vegetation;
2) Remove, reduce, or rearrange fuels to promote a more fire resilient forest and limit impacts to natural resources, should a wildfire occur; and
3) Provide a mix of forest products to contribute to economic sustainability.

Fire exclusion and past management have contributed to high tree densities and less diversity in terms of patch size, tree age, and species composition. This has resulted in high susceptibility of the area to uncharacteristic wildfires and insect and disease outbreaks. There is an urgency to complete analysis and implementation of treatments within the project area to restore vegetation to desired conditions. This will reduce the risk of wildfire impacts and improve forest health in this landscape.

The project goals align well with the Montana Forest Action Plan which emphasizes actions across boundaries to reduce wildfire risk and improve forest health, and retention of a forest industry in Montana.

DNRC supports the Proposed Action Alternative which includes 4,205 acres of commercial vegetation treatments and 3,696 acres of non-commercial treatments on national forest lands. The proposed treatments would restore diverse vegetation conditions, reduce risk to uncharacteristic wildfire and insect and disease disturbances, and provide wood supply and jobs to help sustain the local economy. DNRC supports treatments in inventoried roadless and riparian stands as these will help improve the diversity of vegetation, including increasing the presence of larch, pine, and quaking aspen, as well as helping to increase the development of large trees in the landscape.

The proposed treatments will increase our ability to manage wildfires safely and effectively in this area. 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. If no action is taken the dense understories would continue to provide ladder fuels for surface fires to expand into canopies, killing many of the existing large-diameter trees that would have otherwise survived a surface fire. The probability of uncharacteristic, highly impactful stand-replacing fires would remain high.

The effects of the Proposed Action and No Action Alternatives on Air Quality and Carbon and Climate should be disclosed in more detail in the EA. The proposed action will lower the probability of periods of adverse air quality associated with severe, large wildfires. The No Action Alternative would continue the current risk of adverse air quality with severe wildfires.

Regarding the effects on carbon stores and impacts of carbons change: studies are showing that carbon in Montana's forests is declining. The widespread loss of forest cover through severe wildfires is the greatest threat to loss of carbon stored and sequestered in western forests. High severity burns result in long term loss of forest cover and associated plant and animal communities dependent on forest ecosystems. If severe fires result in loss of tree cover over large areas the impact on carbon can be substantial. 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.

DNRC is committed to continuing a positive working relationship with the Flathead 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 both agencies' missions.

Sincerely,

Greg Poncin,
Area Manager
Northwest Land Office

CC: Dave Marx, Unit Manager, Swan Lake Unit
Stephen Kimball, Local Government Forest Advisor