

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

December 8, 2023

Chris Dowling, District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Montana Department of Natural Resources and Conservation, Comments on the Proposed Action for the Rumbling Owl Fuels Reduction Project

Dear Mr. Dowling:

Thank you for the opportunity to comment on the proposed action for the Rumbling Owl Fuels Reduction Project. The project area is located southeast of Condon and east of Highway 83. The project area lies within one of the 250 high risk fireheds addressed with the national Wildfire Crisis Strategy. Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands near this area. Our agencies share the common goals of reducing wildfire 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.

The analysis area includes national forest lands adjacent to private lands in the Wildland-Urban Interface (WUI). Lack of fire in this landscape has led to a species composition shift and increased stand densities. This has resulted in stressed trees and unhealthy stand conditions, also causing increased surface, ladder, and crown fuels. The Forest Service wildfire risk assessment shows that Condon, a Community at Risk, has a Very High Wildfire Risk rating in all 4 assessment factors: Risk to Homes, Wildfire Likelihood, Home Exposure, and Vulnerable Populations. Condon is in the 95 th percentile of communities at risk from wildfire in the U.S. The Montana Forest Action Plan identified the project area as a 'Priority Area for Focused Attention' for high fire risk due to Wildfire Risk and Distance to WUI.

The area is an important connectivity zone for wildlife, including grizzly bear, Canada lynx, and wolverine. The area is also within a Grizzly Bear Primary Conservation Area. Holland Lake Basin is a bull trout conservation watershed which is critical for the conservation and recovery of native fish and other aquatic species.

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

- 1) Reduce wildfire risk to loss of life, property damage, and ecosystem function within the WUI;

- 2) Improve diversity of forest composition for more resistant and resilient forest conditions at the stand and landscape levels.

The purpose of the project aligns 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.

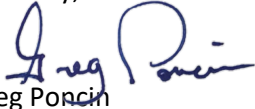
DNRC supports the proposed action which includes treating 6,477 acres to reduce fuels and improve resilience of forests to uncharacteristic wildfire and forest health impacts. The treatments would include 2,022 acres of non-commercial fuels reduction and 4,441 acres of commercial harvest (intermediate and regeneration treatments). DNRC strongly supports the proposed shaded fuel breaks in locations that serve as Primary Control Lines (PCLs).

The outcome of the proposed treatments will be reduced ladder fuels and tree densities which will reduce risk to wildfires and insect and disease impacts. This 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. Prescribed burning and pile burning following vegetation treatments will result in significant reduction of the fuels hazard in the project area.

The environmental analysis for this project should include detailed descriptions of the proposed treatments, expected post-treatment conditions, and how vegetation diversity will be increased and wildfire risk reduced. Also disclose the effects of the No Action Alternative, including the expected impacts to public safety and resources with continued intense, large scale wildfires in a warming climate. The analysis should include the effects of alternatives on carbon storage and sequestration. 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. The best strategy for adapting landscapes is to actively manage forest vegetation for reduced tree density and diverse structure and composition. This will prevent large scale loss of forest cover and facilitate continued carbon sequestration and storage.

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 the missions of both agencies.

Sincerely,



Greg Poncin
Area Manager
Northwestern Land Office

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