

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Northwestern Land Office

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March 6, 2024

Jennifer Runnels, Team Leader  
Libby Ranger District  
Canoe Gulch R.S.  
12557 Highway 37  
Libby, MT 59923

Re: Montana Department of Natural Resources and Conservation, Comments on the Proposed Action for the Snowshoe Granite 1000 Roadside Fuelbreak Project

Dear Ms. Runnels:

Thank you for the opportunity to comment on the proposed action for the Snowshoe Granite 1000 Roadside Fuelbreak Project. The project area is immediately west of Libby which is a designated Community at Risk as defined in the Healthy Forest Restoration Act (HFRA, 2003). The 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 project area includes national forest lands along road corridors adjacent to private lands, residential homes, and businesses within the Libby city limits. Dense vegetation and heavy fuels directly upwind of private property makes for extremely high risk of wildfire impacts including potential loss of life and property. Lack of recent fire has resulted in a species composition shift and increased stand densities which has led to stressed trees and unhealthy stand conditions, also causing increased surface, ladder, and crown fuels.

The Lincoln County Commissioners have declared a county-wide emergency due to the extreme wildfire threat in the county. The planning area is entirely within the Wildland Urban Interface (WUI) in the 2023 Lincoln County Community Wildfire Protection Plan (CWPP). It's identified in the CWPP as Priority 1 for hazardous fuels treatments. The area is within the Kootenai Complex of the national Wildfire Crisis Strategy, a national priority for addressing wildfire risk. It is within a Priority Area for Focused Attention in the Montana Forest Action Plan due to high risk to severe wildfire impacts.

DNRC supports the purpose of the project which is to provide strategic fuelbreaks along roads adjacent to Libby. The emergency fuels situation near Libby presents an urgency for pro-active fuels management. This project will reduce hazardous fuels in road corridors to increase the ability of wildland firefighters to control fires threatening the community. The project will establish safe ingress and egress routes for the public and firefighters and increase wildfire defense areas. These are critical needs identified in the Lincoln County Community Wildfire Protection Plan (CWPP). The project aligns 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 which includes 1,189 acres of commercial thinning and 138 acres of pre-commercial thinning adjacent to ten roads. Following thinning, smaller trees may be piled and lopped or scattered to reduce ground fuels, or brought to roads or landings for chipping and use as biomass. Planned under burning and pile burning following vegetation treatments will result in significant reduction of the fuels hazard in the project area. This will facilitate fire remaining near the ground and not spreading through the trees as a crown fire.

The treatments proposed are primarily along county roads on national forest lands which provide access to private residences. The outcome will be reduced ladder fuels and tree densities in road corridors near private property. 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.

DNRC looks forward to further discussions about using the Good Neighbor Authority (GNA) to implement the project as quickly as possible. DNRC has programs to assist private landowners in the area with treatments on their lands.

DNRC is committed to continuing a positive working relationship with the Kootenai 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: Doug Turman, Unit Manager, Libby Unit  
Stephen Kimball, Local Government Forest Advisor