

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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Emily Platt, Forest Supervisor
2880 Skyway Drive
Helena, MT 59601

Re: Montana Department of Natural Resources and Conservation, Comments on Draft
Environmental Assessment for the Forest-wide Prescribed Fire Project

Dear Ms. Platt:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Helena-Lewis and Clark Forest-wide Prescribed Fire Project. The Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages the State Trust Lands in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

DNRC recognizes the need to dramatically increase the pace and scale of fuel reduction work to reduce the impact of high severity fire. The Forest Service national Wildfire Crisis Strategy highlights the critical need to reduce the time involved with individual project planning through large scale and streamlined analysis such as that being proposed with this forest-wide prescribed burning project. Thank you for working outside of the norms and developing this plan for prescribed fire and other fuels treatments across the Forest.

The purpose of the project includes reducing the risk of uncharacteristically severe wildfire and influencing how wildfire and other disturbances will shape the landscape and impact local communities. Returning fire to the landscape is needed to reduce high fuel loads and non-native grasses. Many areas on the Forest are set up for large-scale, severe wildfires that can lead to loss of forests across landscapes, soil productivity, viewsheds, and habitats.

Returning fire regimes to approach natural conditions using prescribed burning is important for managing fire risk and also is an important adaptation strategy for climate change. Of the 2.6 million acres in the project area, 356,886 acres have been identified as Priority Areas for Focused Attention in the Montana Forest Action Plan due to potential for severe impacts from wildfire and/or insects and disease outbreaks.

DNRC supports the proposed action which is to authorize prescribed burning, hand treatments and mechanical treatments of vegetation across 2.3 million acres of the 2.6 million acre project area. This represents areas needing restoration or maintenance outside of designated wilderness and research natural areas. Introducing fire to the landscape is the most cost effective tool at the Forest's disposal and prescribed should be used when possible, based upon a high probability of success and low probability of escape.

Safe and effective prescribed burning requires advance preparation such as thinning and ladder fuels reduction. Thinning followed by burning reduces fire spread and intensity. The proposal to thin small diameter trees, rearrange fuels with hand tools and/or mechanical equipment, and follow with prescribed burning on no more than 20,000 acres per year is an ecologically sound plan for the Forest.

DNRC supports the criteria listed in the Conditions and Prioritization of Project Activities section. These will ensure treatment of areas with the highest risk to communities and values, and with the highest probability of success. DNRC supports the priorities identified for Geographic Area Groups, including the lower elevation ponderosa pine and Douglas-fir forests for the Jefferson Division and the considerations listed for the other groups.

DNRC supports the design features to retain Whitebark pine in the project area. We concur that with planned mitigation, increasing prescribed burning and other treatments may impact individual trees but will not reduce the broader species distribution. We are more concerned about the loss of species distribution from uncharacteristic severe wildfires in absence of prescribed fire or vegetation treatments.

The proposed action aligns with goals of the Montana Forest Action Plan (MFAP) including reducing wildfire risk and improving forest health across boundaries. Other goals of MFAP include enhancing local economies and retaining a forest industry in Montana. We urge you to consider ways to utilize residual wood material from this project. Though it may require funding for service contract work, removing wood material for firewood, posts and poles, or other products would allow wood material to be used and would provide wood and employment for the Montana forest products industry.

We recommend adding to the Effects Analysis that increasing the use of prescribed fire (proposed action) will reduce the potential for severe large-scale wildfires that will reduce carbon through increased emissions. This will also reduce the potential for extreme air quality impacts with severe wildfires.

Regarding the implementation process we appreciate that each year planned activities would be shared with the public and partners. DNRC can help prioritize projects and assist with coordinating treatments on the Forest with work on neighboring state and private lands. DNRC has programs to support treatments on private land and can help facilitate treatments that cross boundaries.

DNRC is committed to continuing a positive working relationship with the Helena-Lewis and 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 both agencies’ missions.



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Cc: Kristen Baker-Dickinson, Clearwater Unit Manager; Stephen Kimball, Local Government Forest Advisor

