**Restoration Emphasis Alternative**

**Alternative to Proposed Action**: The proposed action fails to address the **urgency** **and scale** of treatments required to address the “Need for Change” in the next 10-20 years. Half measures run the risk of both increasing the intensity and size of wildfires and the scale of insects and diseases outbreaks. The modest acreage identified for treatment in the Proposed Action will not achieve the desired conditions of Ecosystem Integrity (Biodiversity) and social and economic sustainability (climate change and wildfire crisis). The limited scope and scale of these treatments will also put lands that interface with communities large and small at risk. Thus, taking actions such as large (250 to 2500 acres) prescribed burns in MA 2 and 3 are needed. The use of natural ignitions in MA 1 & 2 and in some of the larger MA 3 areas under the right circumstances would be enhanced if more POD development was put in place using Finney’s SPLATS (Strategically Placed Landscape Treatments).

Harvests prior to burning can greatly enhance the development of the PODS and SPLATS. We know from the wilderness fire program that “double burns” or “cleaning burns” are important to the self-limiting function that natural fires create across the landscape. The Lolo portion of the Scapegoat Wilderness has excellent examples of the role of previous fires changing the behavior and effects of subsequent fires: the Cabin Fire of 1979, Canyon Ck 1988, Cabin Fire 2001 and the Conger Fire of 2007. One of the purposes of wilderness is to learn from how natural processes operate with reduced influence of humans. We need to use these lessons.

Management can emulate those events by using harvests followed by underburns inside MA 3 and along the boundaries between MA 3 & 4 areas. This greatly reduces the risk of severe fires coming out of MA 1, 2 and 3 into MA 4, 5 and private or state lands. They give incident command teams landscape anchors for conducting their actions, such as the Colt summit project on Seeley Lake RD, provided along the eastern border of the Colt Fire in 2023.

The placement of these treatments should use temporary and/or short-term specified roads to comply with the Roadless Rule. The use of these types of roads protects the long-term integrity of travel corridors/connectivity for wildlife sensitive to human presence, such as grizzly bears, wolverines, etc. We also recommend the use of temporary cross-laminated timber bridges in place of culverts for stream crossings. These will protect the integrity of the streambed and more of the riparian vegetation than a temporary culvert, thus better protecting aquatic ecosystems and water quality. The use of these types of temporary bridges also assures effective closure to illegal use. Skip Hegman, a former LNF engineering tech, pioneered the planning, implementation, use, and closure of temporary roads in a way that was cheaper than permanent roads. If you can’t find his information on the forest, he should be contacted.

Given **climate change** combined with decades of fire suppression have resulted in the continuity of fuels that has set up mega-fires as documented in the assessment. Significantly large and strategically placed treatments are needed to avoid dramatic losses of forest carbon from fires and the deterioration of dead trees after the fire as well as the release of carbon from the down wood. Well-designed timber harvest can accomplish three major benefits: (1) The live trees remaining after the treatments continue to *sequester* carbon (as they are much more likely to survive a wildfire or beetle outbreak); (2) The conversion to wood products can *store* some of the carbon in various kinds of long and short-lived products; and (3) The use of wood will *substitute* for steel, concrete, aluminum, plastic and other fossil carbon intensive materials. These three “S’s” are powerful climate mitigation and adaptation tactics.

To maintain and protect ecological integrity and therefore **biodiversity,** action is needed sooner than later. The combination of climate change and fire suppression has homogenized much of the landscape, creating the likelihood of more extensive high severity fire that can adversely affect many types of habitats, including old growth, riparian vegetation, and wetlands. The scale of these events put desired watershed functions at risk and can subsequently cause negative effects on native aquatic species. The implementation of actions at scale in MA’s 3, 4 and 5 described above can help mitigate the potential damage.

Social and economic values are also at risk when the severity and size of **wildfires** are not addressed**.** Human health is being severely compromised by wildfire smoke intrusions for weeks at a time. The smoke affects the tourism industry through cancellations or avoiding booking reservations during prime smoke season. The fires and smoke reduce the quality-of-life Montanans seek.

To reduce the threats to communities, municipal watersheds, powerlines, roads, communication sites and other infrastructure we need to reduce ember storms that feed the rapid expansion of wildfires treatment is needed; Finney et al research shows that landscape scale treatments spread (25-35%) across the landscape in larger patches (200-400 acres) can significantly alter fire behavior and resource effects and the ability of an Incident Command Team to more effectively fight wildfires with fewer negative effects, as described above.

Once again, vegetative treatments and prescribed fire beyond what are identified in the Proposed Action need to be accelerated over the next 10-20 years. The LRC recommends revisiting the scale and timing of proposed management actions to meet the urgency of the current situation.