Fire Management and the Wildland Urban Interface

Thank you for the opportunity to comment on the Proposed Action for the Lolo National Forest Plan. The LRC offers the following suggestions for the proposed actions related to Fire Management and the Wildland Urban Interface.

**General comments**:

1. The LRC commends the Forest for making planning documents readily accessible to the public with multiple opportunities for the public to interact with Forest planning staff. These interactions made it slightly less daunting to review so much information. The Plan Assessment is an excellent foundation that needs clear linkage to the Proposed Action and the eventual Selected Alternative and the Record of Decision.
2. These planning documents must be written to inform the public, the owners of these National Forests. The LRC recommends avoiding esoteric terminology like “fire refugia” or “stochastic” without clear definitions of their meaning.

**Chapter 1**: **Introduction.**

The wildfire crisis, exacerbated by climate change and dysfunctional forest conditions require this Plan Revision to provide clear direction to address these challenges. The public needs to understand this challenge from the beginning of the introduction to the Forest Plan. The frequency and severity of fires are creating a National Wildfire Crisis that shapes the physical and social environment that the Forest Plan is addressing.

**Chapter 2**: **Forest Wide Direction**

 The Forest-wide Ecosystem Integrity (pages 12 ff)

This section must discuss not only the role fire played historically in shaping ecosystems but how increasingly frequent severe fires are shifting forests from their natural range of variability. These larger fires are adversely impacting habitat connectivity, soils and watershed values. The LRC recommends that the Forest clearly explain the benefit of fuels treatment including hand thinning, mechanical harvests and prescribed burning in reducing the probability of severe fire and its impacts to watersheds, soils, and aquatic and terrestrial ecosystems

Fire, Fuels, and Wildland-Urban Interface (FFW) (pages 29-32):

The LRC recommends the Forest Plan clearly explain the reasons land management agencies treat lands in the Wildland Urban Interface. The reasons for treatment include reducing stand density and fuels on National Forest land near and adjacent to private land, providing breaks in fuel continuity, using SPLATS approach, thus providing fire suppression crews safer locations to conduct control operations if required. .

The LRC recommends that the FFW plan section (Fire, Fuel, and Wildland Urban Interface) should explain Agency and Local government jurisdictional protection responsibilities and clearly define the limits of Agency responsibilities and jurisdictional authority, as well as homeowner responsibilities.

The LRC recommends that the Forest incorporate an objective that Forest fire staff and line officers meet with counties annually to implement priorities identified in Community Wildfire Protection Plans (CWPP’s) to reduce risk of fires to communities. These meetings should include a review of progress on implementing defensible space recommendation for residences as enforced or recommended by local governments. Review with local officials the range of acres to be treated by thinning and prescribed fire per decade to approximate the role fire played in the natural system (frequency and intensity). Add a Guideline that allows for departure from natural system fire intervals on WUI projects as needed.

The FFW plan section should provide objectives and standards for the Lolo National Forest fuel treatment program of work that reflect the recommended goals and implementation strategies outlined in the Montana Forest Action Plan (MFAP). These strategies emphasize active forest management to reduce the risk of wildfire to communities, water supplies, natural resources, critical infrastructure and other values of concern while restoring characteristic fire-adapted landscapes in a manner appropriate to local fire regimes.

**Chapter 4:** Management Area Descriptions (pages 152-161)

MA 4. General Forest:

The LRC recommends that the Forest Identify priority fuel treatments in critical locations (e.g. the Wildland Urban Interface,) as recommended by the Montana Fire Risk Assessment. Desired Condition MA 4-DC 03) should include hazardous fuels reduction and forest health treatments as a rational for the vegetation management activities listed for forest restoration.

**Chapter 5: Plan Monitoring Program**

FFW Plan Monitoring Program (Page 166, Table 76). The LRC recommends a monitoring question that asks for data on the number of meetings between LNF line officers and fire staff and local government officials to discuss fire preparedness issues.

In summary, the increased frequency and severity of wildfire is evidence of a national wildfire crisis. The significance of this issue requires that the Lolo National Forest formulate actionable strategies commensurate to the problem at the local level. The eventual Forest Plan Revision Selected Alternative must highlight the crisis and provide clear direction for addressing it.