



Date January 29, 2025

Jeremy Casterson, Acting Forest Supervisor
24 Fort Missoula Road
Missoula, MT 59804

Subject: Montana Department of Natural Resources and Conservation, Comments on the Forestwide Prescribed Burn Project

Dear Mr. Casterson:

Thank you for the opportunity to comment on the Lolo 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 Lolo National Forest (LNF)

Many areas on the Forest are set up for large-scale, severe wildfires that can threaten communities, lead to loss of forests across landscapes, soil productivity, viewsheds, and habitats.

The proposed action aligns with goals of the Montana Forest Action Plan (MFAP) including reducing wildfire risk and improving forest health across boundaries. DNRC commends the LNF working with their partners so that all land managers within the greater LNF planning area could utilize the effects analysis



that will be completed as part of this analysis to issue separate, ownership specific NEPA decisions to facilitate cross-boundary fuels management.

Other goals of MFAP include enhancing local economies and retaining a forest industry in Montana. We urge you to consider ways to utilize material from this project. Though it may require funding for service contract work, removing logs for firewood, posts and poles, or other products could actually reduce the cost of treatment and would not only sequesters carbon but also but also contributes to local economies.

DNRC supports the proposed action to implement annual prescribed fire to approximately 10,000 acres and up to a maximum of 45,000 acres annually for the next 20 years. This represents areas needing restoration or maintenance outside of designated wilderness and research natural areas. Introducing fire to the landscape is an important tool and should be used based upon a high probability of success and low probability of escape.

The Proposed Action does not include the use of harvesting systems or any commercial timber harvest. The LNF should look for opportunities to use commercial harvest to help meet fuels reduction objectives in a more efficient, effective or inexpensive way. DNRC urges the Forest to not masticate or burn merchantable material and to research ways to capitalize on how these trees can be used for forest products. We encourage you to find a way to utilize trees that fall into that 6-12" dbh size class for lumber or firewood or pulp with smaller sizes used for post and pole material. Commercial use of wood products from thinning can offset costs and increase the number of acres treated. Fire managers should have ALL tools available when preparing for Rx fire and therefore the Forest should be looking at ways to utilize all material to support and contribute to communities and local economy.

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 including Whitebark pine from uncharacteristic severe wildfires in absence of prescribed fire or vegetation treatments.

We recommend adding that increasing the use of prescribed fire (proposed action) will reduce the potential for severe large-scale wildfires and will reduce carbon through increased emissions in the Effects Analysis. 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. It's important to note that in some instances within the project area DNRC is the recognized wildland fire protection agency on National Forest Service lands. Notification and



communication with the local DNRC Unit Office will be especially important when burning on those lands. 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 has a Good Neighbor Authority (GNA) program that provides state capacity for implementing restoration projects on the LNF and may have capacity to assist with implementation of this project. The DNRC has a cooperative agreement with the LNF that would allow DNRC employees to assist with prescribed burning if additional staffing is needed.

DNRC is committed to continuing a positive working relationship with the LNF, 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.

Sincerely,

Mike O’Herron
Area Manager, Southwestern Land Office

Greg Poncin
Area Manager, Northwestern Land Office

Cc: Amy Helena, Missoula Unit Manager
Carol Hatfield, Local Government Forest Advisor

