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SUBJECT: Department of Natural Resources and Conservation comments on the West Reservoir scoping document.

Dear Rangers Davies and Ladell,

Thank you for the opportunity to comment on the scoping for the West Reservoir Project. The Montana Department of Natural Resources and Conservation (DNRC) strongly supports this project. The project area is approximately 129,608 acres and is located west of the Hungry Horse Reservoir, within Flathead County, MT.

Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

The purpose of 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. We also support the maintenance of previously harvested areas those of which have returned to dense, mixed conifer patches that are increasingly susceptible to insects and disease.



With approximately 7,380 acres of the project area located within the Wildland -Urban Interface (WUI) established by the Flathead County Community Wildfire Protection Plan (CWPP) (2021) we urge you to look at increasing the number of acres treated within the 129,608-acre project area.

The primary objective for treatments in the WUI should be to reduce the intensity of fire behavior and increase options for safely protecting values at risk. To effectively reduce fire intensity, post-treatment stands should be open enough for fire to drop to the ground and not spread through the crowns. Consider adding shaded fuel breaks to enhance fire suppression and safe ingress-egress. These can be used as anchor areas for burning out to provide lines of defense near homesites, recreation areas and community assets.

DNRC recognizes the need to dramatically increase the pace and scale of fuel reduction work to reduce the impact of high severity fire and improve forest health. 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. 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.

Understanding the 2001 Roadless Conservation Rule states that timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, unless the Responsible Official determines that the removal of generally small diameter timber is needed for one of the purposes specified in § 294.13(b)(1), such as reducing the risk of uncharacteristic wildfire effects. Noting that approximately 51 percent (65,704 acres) of the project area is located within inventoried roadless; we encourage the Responsible Official to look at opportunities (including hand thinning small diameter timber and prescribed burning) to reduce the potential for severe large scale, uncharacteristic wildfires and reduce carbon through emissions in the Effects Analysis. This will also reduce the potential for extreme air quality impacts with severe wildfires.

DNRC supports the Purpose and Need, but outside of Inventoried Roadless in the general forest management areas, DNRC encourages the Forest to find ways to utilize trees that fall into small diameter class for lumber, 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. With only 2,001 acres of commercial treatments and 6,189 acres of noncommercial treatments being proposed, the number of acres treated needs to be increased to meet the Purpose and Need, National Wildfire Crisis Strategy and Montana Forest Action Plan (MFAP).

The proposed action aligns with goals of the 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 a variety of 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 sequester carbon but also contribute to local economies.

DNRC supports the prescriptions to retain and restore Whitebark pine in the project area, based off the Crown of the Continent Ecosystem Pilot Whitebark Pine Strategy. We are more concerned about the loss of species distribution, including Whitebark pine, from uncharacteristically severe wildfires in the absence of prescribed fire or vegetation treatments.

Please include the effects of the No Action Alternative in your analysis, including the continued risk and impacts of uncharacteristic stand-replacing wildfires and insect and disease outbreaks. The No Action is underutilized and can be very powerful but not if restricted to one or two sentences.

DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing commercial and restoration projects on the Flathead National Forest and may have capacity to assist with implementation of this project.

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

Sincerely,

Greg Poncin  
Area Manager  
Northwestern Land Office  
MT Department of Natural Resources and Conservation

CC: Dave Marx, Unit Manager, Swan Unit  
Carol Nunn-Hatfield, County Forest Advisor, MT DNRC

