



Martin Jacob, Lolo National Forest
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Re: Lolo Prescribed Fire Project

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=67482>.

February 12, 2025

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for the Lolo Prescribed Fire Project.

I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our more than 87,000 supporters are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana's wild places.

II. Summary of Comments

Wild Montana appreciates the Forest's focus on having more fire on the landscape and creating a forest-wide plan that takes into account cumulative effects. Wildfires are a natural and necessary environmental force in many western landscapes, including the Lolo National Forest. Compounding effects from past fire suppression, climate change, and further encroachment of built environments into wildfire-prone regions have elevated the risk of particularly intense wildfires and the damage those fires can do.

Overall, the purpose and need of this project are soundly based on the on-the-ground need for ecological restoration and addressing the risk of severe fire. However, we want to ensure that



going forward into the next stage of analysis, the Forest is properly analyzing potential impacts and discloses those to the public.

III. Recommendations to Improve Subsequent Analysis

A. Timeline

As Wild Montana put forward for the Helena-Lewis and Clark National Forest, we urge the Forest Service to consider reducing the timeframe to 10 years instead of 20 years. A shorter timeline would be more appropriate for a project of this breadth to analyze. Conditions are likely to change significantly over 20 years, and updated analyses or project design criteria could be necessary and beneficial.

B. Scope of Treatments

We recognize that mechanical and hand treatments are a necessary complement to prescribed burning in order to address the unnatural accumulation of fuels that have developed as a result of fire suppression during the last century. However, the proposed project does not appear to provide clear limits on the amount of mechanical treatment allowable or whether it has to be tied to burn treatments as well. While the scoping document states that the project aims to implement prescribed fire on between 10,000 to 45,000 annually for a maximum of 1,664,112 acres during the life of the project, it would be helpful if the environmental assessment (EA) clarifies whether this target acreage includes mechanical and hand treatments as well, or whether there is a separate anticipated annual acreage for non-burning treatments.

It will be important to clarify the vision for what this project entails to help ensure consistency in the interpretation of the authorization over the next 10–20 years. Wild Montana recommends setting an overall limit on acres treated as well as a limit of each treatment type per year to provide accountability and set sidebars for how this authorization could be used by Forest managers with different forest health approaches over the lifespan of the project.

C. Recommended Wilderness and Other Wildlands

The only mention of Recommended Wilderness states that no mastication will occur in Recommended Wilderness or Inventoried Roadless Areas.¹ Wild Montana recognizes the need to address ecological health and resilience in these remote areas, and the opportunity to

¹ Design Feature Rec-7, Lolo National Forest Forest-wide Prescribed Fire Project, *Public Scoping Document* (Jan. 2025) [hereinafter *Scoping Notice*].



improve wilderness character by returning fire to the land, however going forward we want to ensure the EA has additional analysis and design criteria specifically for these management areas to ensure there are proper sideboards and considerations.

D. Implementation and Monitoring

A robust implementation and monitoring plan is crucial for a project of this scale both in terms of acres and years. Clear monitoring will provide feedback to forest managers about how to best design and implement future treatments in the project area. The results of monitoring could identify relevant improvements to procedures or exemplary practices to benefit future treatments. At this time, we saw no mention of monitoring or a monitoring plan for the lifespan of the project and would like to see that included in the EA.

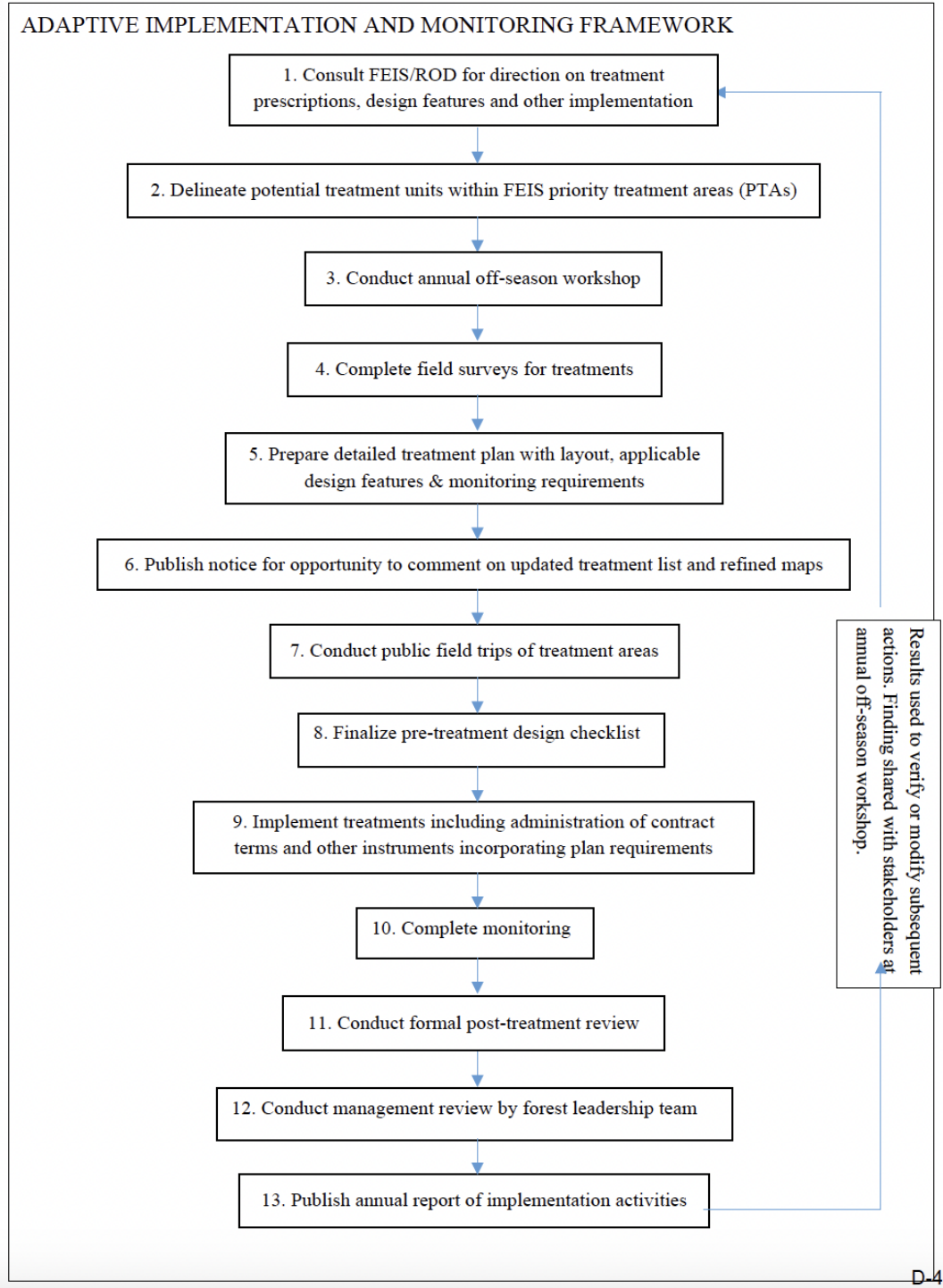
Wild Montana recommends also creating a clear implementation plan that outlines how areas will be prioritized. One example to consider is the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) Project on the Grand Mesa, Uncompahgre, and Gunnison National Forest (GMUGNF).² This project includes an Annual Interdisciplinary Team Treatment Review process and an Adaptive Implementation and Monitoring Framework that includes field studies before publishing a notice of the project. See Figure 1, Adaptive Implementation and Monitoring Framework for SBEADMR below.³ While the process outlined for the SBEADMR may not be a perfect fit for the Forest-wide Prescribed Fire Project, it is worth exploring in terms of an example of robust monitoring and adaptive management being incorporated into a long-range project. See flowchart on the following page.

² *Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) Project*, Grand Mesa Uncompahgre and Gunnison National Forest, Mar. 2022, <https://www.fs.usda.gov/project/?project=42387>.

³ *SBEADMR FEIS*, Appendix D: Annual Interdisciplinary Team Treatment Review at 4.



Figure 1. Adaptive Implementation and Monitoring Framework for SBEADMR.





E. Public Participation

As the project currently stands, there is no information about when, where, and to what extent treatments will take place over the next 20 years across the forest. The lack of detail makes it almost impossible for the public to provide any meaningful feedback on this proposal. Wild Montana requests further clarity about how the public will learn about the treatments proposed for each year. We want to ensure the public is provided with enough information, including treatment maps, to understand what will occur.

Wild Montana is aware that the Forest has an interest in ensuring transparency and stakeholder involvement and again recommends the example in the Adaptive Implementation and Monitoring Framework from the SBEADMR Project on the GMUGNF,⁴ and Figure 1 shared above, for an example of incorporating additional public participation outside of the NEPA analysis process. While we recognize that comment opportunities and public field trips require a significant investment of time and resources from the Forest, we believe that finding ways to incorporate substantial public involvement is critical for condition-based NEPA proposals. Providing transparency, public education, and opportunity for commenting on site-specific proposals will likely improve the relationship between the Forest and the public, reduce potential conflict, and improve project outcomes.

IV. Tribal Consultation

The Scoping Notice states that one of the preliminary topics for implementation coordination is “[t]ribal coordination according to any arrangements made during formal consultation or the environmental analysis stage.”⁵ We want to reiterate that the Forest Service should work closely with tribal interests and incorporate indigenous ecological knowledge about burn practices into this project. Continued and improved consultation is important for fulfilling the trust responsibility to Tribes in the management of the Forest.⁶ The Forest should also ensure that the Tribes are aware of what’s being proposed and have the opportunity to provide feedback regarding implementation and site selection throughout the lifespan of the project.

⁴ *SBEADMR FEIS*, Appendix E: Public Engagement in Adaptive Implementation. A Process for Adaptive Implementation of the Spruce Beetle Epidemic-Aspen Decline Management Response EIS.

⁵ *Scoping Notice* at 7.

⁶ Joint Secretarial Order 3403: *On Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Water* (Nov. 15, 2021), <https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3403-joint-secretarial-order-on-fulfilling-the-trust-responsibility-to-indian-tribes-in-the-stewardship-of-federal-lands-and-waters.pdf>.



V. Road Construction

We appreciate that no new road construction is contemplated as a part of this project. In the EA, we request more information about the “temporarily constructed... other fire control features (such as roads, utility corridors, and trails).”⁷ It would be helpful to know what this may look like and what standards will be put in place for limits and decommissioning.

VI. Conclusion

We support reducing the fire risk to communities near the National Forest and restoring necessary, healthy fire conditions to these ecosystems. The Lolo National Forest, however, must uphold critical standards for public participation, monitoring, and robust environmental analysis. We look forward to seeing the forthcoming EA. Thank you for your consideration of our comments. Please do not hesitate to contact us if you have any questions.

Sincerely,

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⁷ *Scoping Notice* at 6.