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Organization: MT Department of Natural Resources and Conservation

Title: Director

Comments: Dear Mr. Avey: The Montana Department of Natural Resources and Conservation (DNRC) supports the Draft Record of Decision and Land Management Plan (Plan) for the Helena-Lewis and Clark National Forest. The Selected Alternative F best balances diverse public needs and interests such as restoration, timber production, fish and wildlife habitats, recreation, and wilderness. The Plan components are comprehensive and provide a sound framework for managing the forest for all resources into the future. We commend the Forest's efforts in engaging state and local governments and Montana citizens throughout the planning process. We appreciate the extensive time and resources that have gone into the preparation of the Plan revision. DNRC believes this is a solid plan with achievable goals which will help create a more resilient landscape while contributing to state and local economies. DNRC has been a partner in the development of the Plan revision and has strong interest in the final decision. The Plan sets the overall Forest direction for management of national forest lands in central Montana and is crucial to meeting our mutual goals of improving forest conditions across ownerships. The adoption of the Plan will provide the Forest with overall direction and guidance to address our mutual goals of wildfire response, community protection, sustainable forest management and access. The Plan supports many components of Montana's Forest in Focus Initiative through increased integrated forest restoration, an emphasis on local government and collaborative engagement, wildfire risk reduction, cross-boundary identification of priorities, and industry retention. DNRC previously submitted comments on the Proposed Action and Draft Environmental Impact Statement for the Plan revision. DNRC's comments focused on maintaining administrative access for wildfire response and trust land management, allowing for vegetation treatments and hazardous fuels reduction on lands adjacent to recommended wilderness and within municipal watersheds, and retaining timber industry infrastructure and operator capacity to support restoration. We appreciate that most of DNRC's comments were incorporated into the Plan and Draft Decision. One outstanding area involves the decommissioning of roads-where DNRC recognizes the Forest Service needs to balance needs to provide effective initial attack on wildland fires to protect communities and high priority watersheds and other restoration objectives. DNRC believes the potential for reducing critical access is particularly high in the four Priority Watersheds (Headwaters of Sheep Creek, Cabin Gulch, Upper Ten mile, and Telegraph Creek). As your team makes final revisions to the Plan we urge you to provide flexibility to retain roads critical for effective and safe wildfire suppression, including in Priority Watersheds. We applaud your engagement with local government, communities, collaboratives and the general public in identifying recommended wilderness areas in the Plan and offering a mix of diverse outdoor recreation opportunities. The many interests of various stakeholders are difficult to navigate, and you have done an admirable job balancing active forest management with identifying the recommended wilderness areas. We do encourage you to please review the boundaries of some of the recommended wilderness areas with regard to fire protection. Road infrastructure provides the opportunity for the Forest to effectively perform initial attack on wildfires and potentially reduce the transfer of risk of wildfire and its impacts to State and private land. With climate change, changing forest conditions and projected growth into the wildland urban interface, it will be critical to have flexibility to use motorized vehicles and equipment for fire suppression in these areas. Because of our strong interest in the shared stewardship of Montana's forested landscapes, DNRC is requesting to remain an "interested party" regarding all objections to the Draft Record of Decision. And specifically, if changes requested by another party through the objections process present the potential to reduce current or future access to state trust lands or may adversely affect DNRC's fire protection of state and private lands, DNRC requests participation in any objection resolution discussions with objectors. In summary, DNRC supports the Draft Decision and Land Management Plan. We look forward to working with the Forest to implement the Plan. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.