

Data Submitted (UTC 11): 11/2/2020 11:00:00 AM

First name: Hoyt

Last name: Richards

Organization: MT NRDC

Title: Area Manager, Central Land Office

Comments: November 2, 2020

Michael Munoz, District Ranger Rocky Mountain Ranger Station

P.O. Box 340 Choteau, MT 59422

Re: Montana Department of Natural Resources and Conservation, Comments on the Elk Smith Supplemental Environmental Assessment and Draft Decision Notice

Dear Mr. Munoz:

The Montana Department of Natural Resources and Conservation (DNRC) concurs with the information in the Supplemental Environmental Assessment and supports the Draft Decision for the Elk Smith Project. DNRC has fire protection on private lands and manages State Trust Lands in the area. Our agencies share the common goals of reducing wildfire risk and improving forest health on Montana's forested landscapes.

The Elk Smith project would break up the dense continuous stands of young lodgepole pine originating from the 1988 Canyon Creek Fire. This area is immediately east of the Scapegoat Wilderness and adjoins state and private lands southwest of Augusta. These lands are in a transition area of public and private lands. The potential for wildfire impacts in this area is high. The project incorporates the recommendations in the 2020 Tri-County Community Wildfire Protection Plan (CWPP). The DNRC is concerned with any fire leaving wilderness and negatively impacting private lands values. For this reason, the DNRC ask for full suppression of all fires and fully supports any project to position the Forest Service to fully engage fires prior to leaving their protection. Fuels reduction projects such as these, allows firefighters to safely engage these fires and suppress them. Additionally, DNRC is working with landowners adjacent to this property to complete fuels reduction projects on private lands. This landscape approach will broaden the collective firefighter's ability to safely suppress fires. The project is essential to reduce wildfire risk and increase the ability to effectively manage wildfires in this area.

The Draft Record of Decision includes 10,329 acres of non-commercial vegetation treatments that will significantly improve the diversity of forest vegetation and reduce the risk of severe fire impacts. The prescribed burning and small tree thinning will reduce fire risk across ownerships and provide safer conditions for firefighters and the public. The treatments will also provide more flexibility to manage natural ignition fires in the Scapegoat Wilderness.

DNRC supports the treatments in Inventoried Roadless Areas (IRA). Increasing vegetation diversity will be ecologically beneficial and enhance recreation settings and scenic quality in the IRA's.

The Decision Notice on the Elk Smith project will authorize important cross-boundary work necessary to achieve our shared stewardship goals for reducing fire risk and improving forest health in this landscape. Because of our strong interest, DNRC is requesting to remain an "interested party" regarding all objections to the Draft Decision. If changes requested by another party present the potential to reduce fuels reduction goals, impact access to state trust lands, or adversely affect DNRC's fire protection of state and private lands, DNRC requests

participation in any objection resolution discussions with objectors.

We look forward to working with the Helena-Lewis and Clark National Forest to implement this project. DNRC has programs to support the work of private landowners. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.

Hoyt Richards, Area Manager, Central Land Office

MT Department of Natural Resources and Conservation

CC: Heidi Crum- Unit Manager, Helena Unit

CC: Stephen Kimball- Local Government Forest Advisor

CC: Objection Reviewing Officer, Northern Region, USDA Forest Service (appeals-northern-regional-office@usda.gov)