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Organization:

Title:

Comments: April 20, 2021

Seth Carbonari, District Ranger

West Fork Ranger District

6735 West Fork Road

Darby, MT 59829

Re: Montana Department of Natural Resources and Conservation, Comments on the Mud Creek Project Draft Environmental Assessment

Dear Mr. Carbonari,

Thank you for the opportunity to comment on the Mud Creek Project Draft Environmental Assessment. The project area includes approximately 48,486 acres on national forest lands of which 17,171 acres are in Wildland Urban Interface (WUI). There is approximately 1,897 acres of private land and 166 acres of state land in the project area. The Department of Natural Resources and Conservation (DNRC) has fire protection interests in this area and manages State Trust Lands in the vicinity. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes.

DNRC supports the Purpose of the project which includes improving landscape resilience to disturbance by modifying forest structure and composition and reducing fuels. The project is also designed to reduce crown fire hazard within the WUI and community protection zones. This aligns well with DNRC goals for the state lands in the area as well as the broader landscape with multiple ownerships. The project area is identified as a Priority Area for Focused Attention in the Montana Forest Action plan and has vegetation conditions near communities that presents extreme fire risk. Changing climate and growth into the WUI presents a substantial risk of large stand replacing fires and severe impacts to communities and habitats in this area.

DNRC supports the Proposed Action Alternative as this provides for the type and extent of treatments necessary to meet the purpose of the project, including reducing the extreme wildfire risk in this area. There is a strong need to reduce the dense tree stocking and fuel loading to lessen the intensity of fire behavior to provide for public safety and facilitate safe wildland fire operations. The proposal will restore wildfire to the landscape in a controlled manner, reducing wildfire risk and increasing public and firefighter safety. The proposed action will also improve forest health and address the resource and maintenance issues with the road network in this area. This proposed action will contribute to a sustainable timber industry and to the economic viability of the local communities.

DNRC strongly supports the Condition Based Management approach and twenty year timeline for implementation. The annual public meetings described will facilitate identification of annual implementation priorities and coordination of treatments across boundaries. Condition Based Management streamlines the planning process, allows the Forest to focus their capacity on project implementation, and provides for a longer implementation timeline along with the flexibility to adjust treatments to changes in conditions in this dynamic landscape. This approach also facilitates adaptive management, allowing the Forest to monitor, learn, and adjust actions to better respond to condition needs and meet desired conditions in the landscape. The limits for treatment types for each implementation area provides for sound effects analysis and will support an informed decision. The implementation guidance in Appendix A and B provides a strong foundation for developing on-the-ground treatment plans for implementation. The information and approach laid out in the EA and appendices are sufficient for NEPA requirements and will lead to sound resource protection as well as improvements in conditions.

The Draft EA includes an exceptionally strong analysis of the consequences of no action with regard to fire and fuels, insects and disease, and forest resources as we requested in our scoping comments. It is essential that the

risks to resources and values with no action are disclosed in the EA and in the decision.

Specific suggestions for the Final EIS and Decision:

There could be stronger descriptions of post-treatment vegetation conditions in the EA and in Appendices A and B which guide implementation. In the draft documents the treatment activities are described in detail but there should be more description of the anticipated post treatment vegetation structure and composition. For example, it is not clear what amount, size, and distribution of green tree and dead and down material will be retained in various regeneration activities. It would be helpful to give more details on this and compare the post treatment conditions to historic post-disturbance conditions. It would help readers understand the ecological components left on the landscape after the project is implemented and the similarities with natural disturbances in terms of function and benefit. This would be particularly helpful in assessing the created openings greater than 40 acres. Effects of the project on old growth is a concern raised at the public open house and with other projects on the Forest. The draft EA has a brief discussion of why an alternative to limit old growth treatments to non-commercial activity was not considered in detail. More information on the old growth stands in context of the landscape would be helpful. For example, if any of the old growth stands are surrounded by resilient open stands (currently or after treatments) perhaps there are more options than substantial thinning of the old growth to the minimum standards specified in Green et al. The importance of old growth ecologically and socially warrants site specific assessment of treatment options and additional explanation of the rationale for the treatments selected and targeted post treatment conditions. A field trip for the public and collaborative groups to visit and understand the options and rationale for how some of these stands would be treated would be highly beneficial prior to the final decision.

For implementation please ensure that treatments in the WUI are extensive enough to reduce fire intensity and allow for safe fire suppression. With the proximity of the project to private and state lands there should be coordination with DNRC and private landowners about the timing of treatments and potential sharing of information and resources. There may be feasibility and financial benefits with coordinated treatments. Please consider working with DNRC under the Good Neighbor Authority for additional capacity for timely implementation.

DNRC is committed to continuing a positive working relationship with the Bitterroot National Forest, specifically on landscape resiliency, wildfire response, community protection, and sustainable forest management and access. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions. This project would improve the landscape conditions and exemplify this shared stewardship approach. We look forward to working with you on the location and timing of treatments to meet desired conditions on national forest lands and adjacent private lands.

Sincerely,

/s/

Mike O'Herron  
Area Manager, Southwestern Land Office  
MT Department of Natural Resources and Conservation

CC: Thayer Jacques, Unit Forester; Stephen Kimball- Local Government Forest Advisor