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First name: Greg

Last name: Poncin

Organization: Montana DNRC

Title: Area Manager - Northwestern Land Office

Comments: Kurt Steele, Forest Supervisor Flathead National Forest

650 Wolf Pack Way Kalispell, MT 59901

Re: Montana Department of Natural Resources and Conservation, Comments on the Mid-Swan Draft Record of Decision

Dear Mr. Steele,

Thank you for the opportunity to comment on the Draft Record of Decision (DROD) for the Mid-Swan Landscape Restoration and Wildland Urban Interface Project. As you know, the Department of Natural Resources and Conservation (DNRC) manages State Trust Lands in this area, has direct fire protection responsibility for a large portion of the project area, including some national forest system lands, and assists private landowners with treatments on their lands. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

This project is not only important for the national forest system lands but also for the state and private landowners in the area. The project area includes about 245,865 acres near Condon and Swan Lake. The DROD focuses on the 174,205 acres in national forest system lands. However, about 58,691 acres, or 24 % of the Project Area is in state ownership and about 12,545 acres or 5 % is in private ownership. The northern portion of the planning area includes the Swan River State Forest.

DNRC supports the selection of Alternative B Modified for implementation with this project. The proposed vegetation and road treatments align well with the Montana Forest Action Plan (MFAP). A large portion of the treatment areas are identified as Priority Areas in the MFAP. The treatments are critical for active restoration of this landscape and are based on strong analysis and the best available science. We agree with the statement in the DROD that less active management with this project would be irresponsible given the existing and expected future effects of a changing climate.

Implementing Alternative B Modified would substantially improve forest health and habitats, provide sustained beneficial uses, and reduce resource impacts. The alternative includes 19,000 acres of fuels treatments in the Wildland Urban Interface (WUI). These treatments will reduce the risk of wildfire impacts to communities, citizens, and firefighters. It includes 17,900 acres of commercial timber harvest that will

provide wood for Montana mills, and jobs and revenue for state and local economies. The 23.5 miles of road decommissioning proposed will offset the 10.7 miles of new road construction. The percent of secure core habitat would remain constant and meet the requirements of the Forest Plan. The resulting modified road system will provide effective access for multiple uses including timber harvest, recreation, and provide secure core habitat for wildlife.

We commend the Forest for developing a Final Environmental Impact Statement (FEIS) that provides the specificity necessary to describe alternatives and analyze effects, while setting up a detailed implementation process that includes on-the-ground information collection, public involvement, and flexibility to adjust treatments to respond to new information.

We support the adjustments made between the draft EIS and the DROD. The reduction of the long schedule of work to accommodate further TES consultation, public involvement, and future decisions and objections is appropriate. The adjusted schedule is responsive to Grizzly Bear habitat and disturbance issues raised in the analysis and results in a more balanced plan.

In the Final Record of Decision please consider the following:

- 1) Acknowledge the participation of the Southwest Crown Collaborative in the development of this project. The group participated on field trips and provided input on project design.
- 2) Clarify that the annual public meetings held during implementation will be open to all interested public. The Implementation Guide says these meeting will be for Interested Parties.
- 3) In Table 1, Summary of Actions, add the number of acres treated in the WUI. This amount is mentioned elsewhere in the DROD but should be highlighted in this project summary table.
- 4) Clarify how adjustments to treatment locations and other changes during implementation will be documented. The Implementation Guide refers to checklists and flowcharts the specialists will use. For transparency it would be beneficial to have the changes and rationale clearly described in a report.

DNRC looks forward to working with you in implementation, including participating in the annual public meetings and coordinating treatments on state and private lands in the area. DNRC has programs to assist private landowners in the area with treatments on their lands. Also consider the use the Good Neighbor Authority (GNA) which will retain timber revenue to help fund additional restoration projects.

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 the ability to meet wildfire risk and forest health goals, or adversely affect DNRC's fire protection of state and private lands, DNRC requests participation in objection resolution discussions.

DNRC is committed to continuing a positive working relationship with the Flathead National 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 and watershed management and restoration, benefiting both agencies' missions.

Sincerely,

Greg Poncin Area Manager

Northwestern Land Office

MT Department of Natural Resources and Conservation

CC: Matt Arno- Acting Unit Manager, Nick Aschenwald- Unit Manager, Swan Unit; Stephen Kimball- Local Government Forest Advisor; Objections Reviewing Officer, Region One Forest Service