

Data Submitted (UTC 11): 6/13/2023 7:52:30 PM

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Comments: comments attached in pdf format

Carolyn Upton, Forest Supervisor  
Lolo National Forest  
24 Fort Missoula Road  
Missoula, MT 59804

Dear Ms. Upton:

Thank you for the opportunity to comment on the Draft Assessment for the Lolo National Forest Plan Revision. Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands within and near the Lolo National Forest. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The Lolo Forest Plan Revision is not only important for the national forest system lands but also for the state and private landowners in the area. We appreciate the Forest's early coordination with DNRC in developing the Assessment and other components of the Plan Revision.

The Draft Assessment effectively characterizes the conditions and issues on the Lolo National Forest. The information in the document is comprehensive and accurate. The document sets the stage well for the alternatives and analysis to follow. We appreciate the outstanding work of the Plan Team in developing the draft document.

DNRC offers the following suggestions for improving specific sections of the document:

#### Executive Summary

Page vii. It's mentioned that maintaining ecosystems within the natural range of variability will provide resilience. While this is true it may not be the appropriate desired future condition at least for portions of the Forest. With climate change projections we may need to look more at functional ecosystems than historic ranges as desired conditions. This is particularly true for future stand composition and structure, particularly within the Wildland Urban Interface (WUI).

Page viii. Coniferous Forests. Mentions that old growth is estimated to occur on 8% of the

Forest and showing a slight downward trend since 2008, particularly in warm and dry forest ecosystems. Is this based on the new national inventory or a separate forest wide inventory (clarify where the number came from).

Page xv. Climate Stocks and Carbon Pools. The statement that carbon stocks have increased approximately 9% from 1990 to 2013 is not as meaningful as results of new studies that show carbon in Montana's forests is declining. See: <https://www.washingtonpost.com/graphics/2019/national/gone-in-a-generation/forest-climate-change.html>.

Page xvi. Population Structure and Dynamics. Name the counties which have most of their land base in federal ownership and provide the percentage of federal ownership.

Page xvi. Contributions to Local Economies and Income. In addition to current jobs in the area of influence mention trends showing the declining woods products industry and associated jobs. Describe the contributions to the counties from PILT and Secure Rural Schools payment.

Page xvii. Fire Management and WUI. Drivers include the trend towards more severe wildfires and growth and development into the WUI. Mention the active work counties are taking to prepare for wildfire, including updating the County Community Wildfire Protection Plans (CWPP's).

## Chapter 1

Page 1. 1.2. Setting. Mention the state and private lands within the Forest boundaries and the nature of wildfire and insects and disease not stopping at boundaries.

Page 6. 1.3. WUI. Use the definition of WUI in the Healthy Forest Restoration Act (HFRA) as well as the HFRA definition of At Risk Communities and list these communities that are in the area of influence.

Page 21. 1.6.3. States, Local Government, and Other Federal Agencies. List the 9 counties that overlap the Forest along with the percent of the national forest lands within each county.

Page 22. Land Management Planning Across Broader Landscapes. County Wildfire Protection Plans should be referred to as County Community Wildfire Protection Plans. This is the term in HFRA.

## Chapter 2

Page 27- 29. 2.1. Fire. There should be a more robust discussion of the fuels and fire problem on the Forest. The increases in wildfire in the last twenty years should be emphasized along with the substantially growing risk with climate change and human development in the WUI. The threat to property and human health is growing exponentially. There should be a detailed explanation of the elements that comprise the growing risk and the strategies to reduce the risk. The Montana Forest Action Plan Priority Areas and Goals and Strategies should be helpful for adding more details in the Assessment.

Page 30. 2.1.3. Insects and Disease. Mention the Priority Landscapes established after the

2014 Farm Bill (nominated by the Governor and designated by the Secretary of Agriculture.)

Page 52-53. 2.1.9. Forest Vegetation Management. In addition to characterizing current treatment levels address the large backlog of treatment needs. It's important to note that the backlog of treatment needs will continue to grow unless there is substantial acceleration of treatments. Mark Finney from the RMRS has data on this.

Page 68. 2.23. Coniferous Forests. Share the best information on the amount of old growth and mature forests currently on the Forest and the basis of the inventory (national or Forest-level inventory?, criteria from Green et al).

Page 107. Riparian Vegetation. Mention the growing risk of loss of riparian vegetation and habitat from wildfires.

Page 121-131, 2.5 Landscape Patterns and Connectivity. Describe the effects of the mixed land ownership patterns- how conditions on state and private land connect with conditions on national forest lands to represent the entirety of the landscapes. Describe how patterns and connectivity have changed over the past 20 years and project into the future. Include the effects of fire in this description.

2.7.1. Watershed Condition Framework. For At Risk and Impaired Watersheds mention opportunities with restoration program funding (including Good Neighbor Authority funding) to improve watershed conditions.

Page 180-182. 2.10. Carbon Stocks and Carbon Pools. The statement that carbon stocks have increased approximately 9% from 1990 to 2013 is not as meaningful as results of new studies that show carbon in Montana's forests is declining. See: <https://www.washingtonpost.com/graphics/2019/national/gone-in-a-generation/forest-climate-change.html>.

### Chapter 3

Page 195. 3.14. Key Ecosystem Services and Benefits. It's important to note that wood products from vegetation management provide for long term storage of carbon.

Page 239-241. 3.3.1-3. Fire Management and the WUI. Mentions that over 300,000 acres of hazardous fuels treatments have been accomplished in the Plan area but doesn't mention the time frame of these treatments. Add the number of years in which these treatments took place. Align the terms and definitions in this section with those in HFRA (CWPP, Communities at Risk, WUI). Explain that WUI boundaries are updated by the counties with the CWPP updates. Add more in-depth explanation of growth of development in the WUI and how community risk is increasing with growth and climate change. Mention the Montana Wildfire Risk Assessment and where the highest risk areas are (show map).

Page 283. 3.7. Land Ownership, Status. Add the growing need for coordination and collaboration of landowners to manage across boundaries to reduce risk to wildfires.

Page 285. 3.7.3. Status and Trends. Give the amount of state and private lands within the Plan areas.

Page 293. Roads. Mention access for fire management is a need that is growing with the increase in number, size, and intensity of fires as climate changes. Describe the benefits of shaded fuels breaks along key roads that are pre-planned points of defense.

Page 308-309. 3.9.3. IRA's. Discuss the heavy fuels in many IRA's that are upwind of communities and present risk to property and lives. The Roadless Rule provides exceptions for necessary hazardous fuels removal.

Page 323. 310.1. Status and Trends. A key strategy for climate adaptation is implement vegetation treatments to alter structure and composition to safely return fire to the landscapes.

Page 345. 3.10.6. Municipal Watersheds. Describe the importance of reducing fuels within and near municipal watersheds to reduce wildfire impacts to community water supplies.

DNRC is committed to assisting the Lolo National Forest with Forest Plan Revision as well as continued stewardship of our shared landscapes, 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 management and restoration, benefiting both agencies' missions.

Thank you for the opportunity to provide our comments.

Sincerely,

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

Cc: Greg Poncin, Area Manager, Northwest Land Office; Amy Helena, Missoula Unit Manager; Kristen Baker-Dickinson, Clearwater Unit Manager; Dave Olsen, Plains Unit Manager; Stephen Kimball, Local Government Forest Advisor; Amanda Milburn, Lolo Plan Revision Team Leader