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Organization: DNRC

Title: Resource Conservation Manager

Comments: Re: Comments on Goose Creek Fuel Break Project Proposed Action Dear Mr. Lewellen: Thank you for the opportunity to comment on the Proposed Action for the Goose Creek Fuel Break Project. The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands in the area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project would create and maintain fuel breaks in Goose Creek and Bear Canyon areas, south of 1-90 east of Bozeman and west of Livingston. The purpose of the projects is to pre-treat fuels along existing roads and trails in strategic locations to reduce the spread and intensity of wildfire. This will reduce the risk to first responders and raise the probability of success during direct and indirect engagement on wildfires. Providing fuel breaks in advance of wildfire emergencies represents a proactive approach to protecting communities and landscapes from the impacts of uncharacteristic wildfires that are occurring more frequently with changing climate. The growing number, size, and intensity of wildfires in Montana points to an urgency for action to prepare for wildfire in advance of emergencies. This also provides a more environmentally-sound approach to this action than is possible during the emergency of an actual wildfire. DNRC supports the proposed action which includes the use of mechanical and hand thinning and prescribed burning treatments to create shaded fuel breaks along existing roads and trails in strategic locations. The treatments would be primarily within and adjacent to the Wildland Urban Interface (WUI) identified in the Park County and Gallatin County Community Wildfire Protection Plans (CWPP)'s. There are numerous structures near the project area. Approximately 1,975 acres will be treated with this proposal. Both commercial and non-commercial treatments will be used. The outcome of the treatments will be reduced ladder fuels and tree densities up to 1,000 feet in width along strategic roads and trails. The treatments will facilitate fire remaining near the ground and not spreading through the trees as a crown fire. This will create areas that are advantageous and safe for firefighters to take a stand against a progressing wildfire. An added benefit is increased spacing between trees to maintain or improve forest health, tree growth, and desired species composition. We urge you to consider ways to utilize residual wood material from this project. With roadside treatments there may be interest in firewood, posts and poles, or other products. Following treatments, the fuel breaks should be evaluated for effectiveness in meeting the purpose. DNRC would like to be invited to the post-treatment evaluation. DNRC is committed to continuing a positive working relationship with the Gallatin 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 management and restoration, benefiting the missions of both agencies. Hoyt Richards Area Manager, Central Land Office Montana Department of Natural Resources and Conservation