

Data Submitted (UTC 11): 3/29/2024 6:00:00 AM

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Comments: DNRC's comment letter on Lolo Plan Revision Proposed Action

[attachment text pasted in]

April 1, 2024

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 Proposed Action for the Lolo National Forest Plan Revision ([ldquo]Plan Revision[rdquo]). The 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 across Montana[rsquo]s forest landscapes. The Plan Revision is not only important for the national forest system lands but also for the State and private landowners in the area.

The DNRC offers the following suggestions for the Proposed Action and Alternatives. This includes a recommendation to develop specific alternatives to address wildfire threat and timber supply:

#### Chapter 1: Introduction

The changing scale and intensity of wildfire has resulted in a national Wildfire Crisis that defines the planning environment for the Lolo National Forest today, and into the future. This should be highlighted in the introduction. This will set up further discussion in subsequent chapters, including the suggestions from DNRC that follow below. The growing wildfire crisis makes this Plan Revision different than previous plans for the Lolo and other Montana Forests. Readers should be alerted to this up front.

#### Chapter 2: Forest-wide Direction

Ecosystem Integrity (pages 12-20): Please add a discussion about the role of ecosystem disturbance, including how fire has historically shaped landscape vegetation patterns, composition, and structure. Discuss how changes in climate and wildfire size and severity are evolving conditions compared to historical data. The projected result will be more severe, large-scale burns that will likely impact habitat, connectivity, and other elements of ecosystem integrity. Add a guideline to state low intensity prescribed fire should be returned to the landscape at intervals, based on natural fire, to allow fire to play its natural role in shaping ecosystem integrity.

The Plan should mention that the Montana Forest Action Plan (MFAP) includes 655,195 acres of the Lolo National Forest within Priority Areas for Focused Attention due to risk for uncharacteristic wildfire or insect and disease impacts. Of these, 655,180 acres - all but 15 acres - are outside of designated wilderness or a Wild and

Scenic River and could potentially be treated to reduce risk.

Old Growth (pages 21-22): With regard to [ldquo]Desired Conditions[rdquo], discuss uncharacteristic fire as the primary threat to old growth, followed by insect and disease (as per the national old growth threat analysis completed in 2023). (02): The proactive stewardship statement should specifically call out conditions that are resilient to effects of wildfire.

The goals and standards for old growth presume a baseline old growth inventory to measure whether old growth is degraded or impaired. The existing old growth inventory is critical to identifying trends and needs to be discussed in further detail. Will the inventory come from the national federal inventory report developed with Executive Order 14072 or will there be a forest level inventory of old growth to facilitate monitoring on the forest scale? The goals, standards, and guidelines should be tailored to the Lolo Forest and not [ldquo]cut and pasted[rdquo] from the draft national strategy still in development. The draft national strategy has not had public involvement and is simply not ready to incorporate in the Lolo Forest Plan. The Lolo should have locally developed standards and guidelines for managing old growth (such as Green et al.).

Reducing fuel hazards in old growth stands in the Wildland-Urban Interface (WUI) should not be an exception to the standards requiring approval from the Responsible Official. Fuels treatments are a critical tool for reducing the loss of old growth to wildfire, the primary threat to old growth. Therefore, fuel treatments should be included in the standards as accepted practice, and not an exception needing special approval.

Fire, Fuel, and the WUI (pages 29-32): This is a well-written section calling out the Wildfire Crisis and the need to manage fire to play its role in forest landscapes. DNRC urges you to add a standard indicating the Lolo Forest will coordinate with counties to implement priorities in Community Wildfire Protection Plans (CWPPs) to reduce risk to communities from wildfire. Also include in goals the range of acres to be burned per decade to restore the role of fire to natural intervals, and add a guideline to state low intensity prescribed fire should be returned to the landscape at intervals based on natural fire to allow fire to play its natural role in shaping ecosystem integrity.

Goals and objectives should be added to reflect the growing role of prescribed burning in restoring forest landscapes. These should include the necessity of altering forest vegetation to safely and effectively accommodate prescribed fire. Goals and objectives should also be added to describe post-fire recovery, including salvage of dead and dying trees and stabilization of disturbed terrestrial and riparian areas.

Riparian Management Zones (RMZ) and Ecosystems (pages 36-39): With regard to [ldquo]Desired Conditions[rdquo], add a statement to maintain wildfire scope and intensity within regimes approaching those of historical disturbances. Add to goals and guidelines that there will be proactive treatments in outer riparian management zones to reduce potential for loss of vegetative structure and composition.

Standards: Table 10 provides two alternative ways to define RMZ: based on actual stream channel and slope characteristics, or minimum distances. Using actual channel and slope characteristics is a more accurate and effective approach for managing RMZs for desired conditions. Use of minimum distances is a default based on general assumptions of conditions and tends to provide for more conservative management of these zones. DNRC urges you to take a hard look at the best science and either eliminate minimum distances as the default, or modify the distances to better reflect the best science and provide greater opportunities to manage the RMZ[rsquo]s for desired conditions.

At-Risk Species (pages 43-46): Objective 02: Add a brief rationale for treating 300 acres per year to sustain or restore whitebark pine. At-risk wildlife: Add a goal to reduce risk of habitats lost through severe wildfire. Lynx and Grizzly Bear standards: the direction should be summarized in this section, not just a reference to the appendix for direction.

Carbon Storage & Sequestration (page 50): Please acknowledge that wildfire is the largest threat to carbon storage and sequestration. Add a goal and guideline to proactively treat landscape fuels to reduce the risk of uncharacteristic large stand replacing fires. Widespread loss of forest cover through severe wildfires is the greatest threat to loss of carbon stored and sequestered in western forests. The best strategy for adapting landscapes is to actively manage forest vegetation for reduced tree density and diverse structure and composition. This will prevent large scale loss of forest cover and facilitate continued carbon sequestration and storage.

Air Quality (page 52): Please acknowledge that wildfires present one of the greatest air quality threats to communities and citizens. Add a goal and guidelines to proactively treat landscape fuels to reduce the risk of uncharacteristic large stand replacing fires and accompanying high impact to air quality.

Public Information, Interpretation, and Education (page 69): Developing strong public awareness and education to prepare for fire should be a major goal of this program, and include objectives and guidelines.

Inventoried Roadless Areas (IRAs) (page 84): With one third of the Lolo Forest's total acreage in IRAs, there needs to be an emphasis on returning the role of fire to these landscapes. This should be included in the desired conditions (IRAs) are suitable for restoration to restore the natural role of wildfire. The guidelines should include managing wildfire as a necessary ecosystem disturbance agent, including using prescribed fire for restoration.

Municipal Watersheds (page 90): Please add to [ldquo]Desired Conditions[rdquo]: lands surrounding municipal watersheds are at low risk from impacts of severe wildfire. Add a guideline calling for proactive treatments to reduce the risk of wildfires adversely impacting municipal watersheds and community water supply.

Lands Ownership, Status, and Uses (page 91-93): Please add a Standard to ensure the Forest Service continues to provide reasonable access to State Trust lands as guaranteed under the Alaska National Lands Conservation Act [ANILCA, Public Law 96-487, 94 Stat. 2371 (1980)]. Add a Guideline that the Forest Service continues to prioritize acquisition of permanent access under the Master Cost-Share Agreement or the Easement Exchange process.

Infrastructure (page 98): Please include a goal that national forest roads provide important access for fire response.

Timber (page 105): The Proposed Action needs to more strongly emphasize the timber resource opportunities to meet the needs of the Montana timber industry and local economy. Montana communities not only rely on the economic benefits of the forest industry, but also the ecological, community-protection and forest-use benefits it provides. Actively, sustainably managed working forests reduce the potential negative impacts of severe wildfire to communities; improve forest health conditions which provide clean water, air, and recreational benefits to communities; provide income to private landowners and revenue to local economies; and provide road access to the forest.

The following information from the MFAP Assessment should be used to enhance the timber management discussion in the Proposed Action:

\* Montana currently has six sawmills that each produce more than 10 million board feet (MMBF) of lumber annually. These mills account for nearly 95 percent of the state's lumber production (USDA FS, 2020). Additionally, there are about 70 smaller mills, producing anywhere from 10,000 board feet to over 1.5 MMBF per year. These smaller mills can be incredibly important to the economic viability of rural communities, landowners trying to manage their forests, and to the diversity of the forest products industry.

\* Montana's forest industry faces several issues: limited log supply, labor shortages, distance to mills, and

competition in national and international markets. Many of these issues are interrelated, and addressing them will be critical to ensuring the long-term success of Montana's forest products industry and the services it provides to Montanans.

- \* As of December 2019, Montana mills were running at 60-65 percent capacity. Nearly two-thirds of the state's large sawmills and small wood products facilities have closed since 1990.

- \* Not only is log supply constrained, but the supply itself is at high risk of loss, threatened by catastrophic wildfire and insect outbreaks. To stimulate meaningful investment in existing industry, as well as develop new products and reach new markets, the volume available for harvest likely needs to be increased to levels that are greater than the milling infrastructure is currently utilizing.

- \* The State is actively supporting the expansion of the existing wood products industry markets and diversification of the manufacturing capacity of forest products, with a focus on increasing the utilization of currently low-value material in value-added products.

Further, as has been recently reported, two Montana mills neighboring the Lolo National Forest just announced they will be closing: Pyramid Mountain Lumber in Seeley Lake and Roseburg Forest Products in Missoula. The ability to implement forest restoration work in Montana relies on a healthy, diverse timber industry. With impending closures of these critical mills, the future of forest restoration on the Lolo National Forest is significantly threatened.

The MFAP emphasizes active forest management to reduce wildfire risk and maintain forest health. Vegetation treatments increase diversity of vegetation composition and structure thereby improving fire resiliency and habitats. Timber removed for these treatments contributes to healthy rural economies. The preliminary Suitable Timber base of 851,200 acres (out of 2.2 million acres on the Lolo Forest) is a marginal land base to meet MFAP goals.

DNRC urges you to review the areas proposed for Recommended Wilderness and Wild Rivers (not suitable for forest treatments). Look at opportunities to adjust boundaries of these areas to maximize the acres suitable for treatments to reduce wildfire risk and forest health.

The timber outputs projected in the proposed action are substantially below the Sustained Yield Limit (135 MMBF Sustained Yield Limit (SYT); 44 MMBF Projected Timber Sale Quantity (PTSQ)). The PTSQ should be raised to reflect the growing capacity the Forest is building to address the wildfire and forest health crisis in Montana. Vegetation management needs to be among the highest priorities for the Forest and the PTSQ should reflect that. Impaired vegetation conditions and the growing size and severity of wildfires warrant treating significantly more treatment acres than presented with the 44 MMBF PTSQ. The DNRC's Good Neighbor Authority (GNA) program will provide some of the capacity for additional treatments and timber outputs.

The proposed action should identify the number of acres in the WUI, as well as how many of those WUI acres are suitable for fuels reduction treatments.

The PTSQ estimates shown include economic constraints (as per the 2012 Planning Rule). The Forest should also project and show the PTSQ without economic constraints as other recent Forest Plans in Montana have done. This provides a picture of what volume can be achieved with unconstrained funding and a basis for the Forest Service and partners to seek adequate funding to meet forest restoration and industry needs.

Chapter 3: Geographic Area Direction (pages 110-151): Each Geographic Area Direction section should include a discussion about the role of fire and acknowledge that excluding fire, along with changing climate, substantially increases the severity and scale of wildfire and increases risks of adverse impacts, including to ecosystems and communities.

Distinctive Roles and Contributions: In addition to acknowledging the roles of the tribes with hunting-gathering

and fishing, there should be a strong acknowledgement of the longstanding use of fire by the tribes for cultural purposes. There should be a connection made to cultural practices as the Forest endeavors to restore fire to the landscape with this Forest Plan. This should be described in Ecological Roles and Contributions.

#### Chapter 4: Management Area Direction (pages 152-161)

4.4 General Forest: The location and proportion of General Forest is appropriate (1.27 million acres). This provides for priority fuels treatments in critical locations (including in the WUI). Desired Conditions (03) [ndash] Please add hazardous fuels and forest health treatments to the vegetation management activities listed for restoration.

#### Chapter 5: Plan Monitoring Program (pages 162-177)

Magnitude of Departure From Desired Condition (page 163): It is critical to monitor trends in risk of landscape resources and communities to wildfire impacts. Fire regime and community risk are known departures from desired conditions that have developed into the Wildfire Crisis with unprecedented attention and investments. There must be measures to identify condition trends and success in improving this situation.

Monitoring Old Growth: There needs to be an explanation of what baseline inventory is used to identify trends in old growth. Is it the national inventory developed in 2023 for the national strategy, or is there will there be a forest-scale old growth inventory?

Watershed, Riparian Management Zone, and Conservation Watershed Network: Include as a monitoring question to what extent is wildfire changing riparian habitat, stream shade, streambank integrity and water temperature?

Glossary: CWPP: Add that in Montana, CWPPs are developed by counties with collaboration by state, federal, and local agencies and citizens. The CWPPs include assessment of risk and priorities for communities at risk within the counties.

Moving forward, the DNRC provides these recommendations for key issues and alternatives:

Wildfire Threat: The changing scale and intensity of wildfire has resulted in a national Wildfire Crisis that defines the planning environment for the Lolo National Forest today and into the future. The threat of wildfire should be a driving issue in the development of alternatives and other elements in the plan. DNRC recommends developing an alternative specific to this issue. This alternative should highlight implementation of the CWPP and extensive accommodation of strategies the Forest Service has developed, such as pre-positioned shaded fuel breaks, Potential Operational Delineations (PODs), and landscape resiliency treatments.

Timber Supply: Another issue that should drive plan development is providing the maximum opportunities for timber supply to support forest restoration and local economies. The timber supply and industry infrastructure situation in Montana is delicate, with several mills closing in the past decade. The National Forests in Montana play a key role in sustaining the timber industry and local economies. An alternative should explore the maximum timber opportunities from the Suitable Timber base (851,200 acres). With a maximum timber alternative, the PTSQ would be much higher than the Proposed Action and approaching the Sustained Yield Limit of 135 MMBF. We understand there are issues that would not make a maximum timber alternative the best choice for the Forest. However, it is important to display what this would look like, and the tradeoffs with timber supply that occur when other issues and alternatives are considered for resource balance.

DNRC appreciates participation in the Plan Revision process as a Cooperating Agency. We look forward to working with the Revision Team to further develop the new plan. DNRC is committed to 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 [ldquo]all hands, all lands[rdquo] approach to forest management and restoration, benefiting both agencies[rsquo] missions.

Sincerely,

Mike O[rsquo]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