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Comments:

April 3, 2025

Flathead National Forest

Attn. Chris Dowling, Swan Lake District Ranger

Swan Lake Ranger Station

Re: East Valley Fuels Reduction Project Scoping Comments

Dear Forest Supervisor Botello, Swan Lake District Ranger Dowling, and Hungry Horse District Ranger Davies,

Montana Forest Consultants (MFC) submits the following scoping comments regarding the East Valley Fuels Reduction Project, which will treat 2,541 acres to reduce hazardous fuel loading within the wildland urban interface in the communities of Bigfork, Creston, and Columbia Falls.

MFC is the largest and most comprehensive forest consulting company in Montana, spanning a footprint of over 100,000 acres and serving over 200 landowners and agencies since 2016. MFC is a team of foresters, biologists, and ecologists that provide expertise and technical services to landowners and agencies, offering a holistic approach to forest and rangeland management. MFC takes great pride in providing solutions for complex projects that greatly improve a landscape and meet landowner goals and objectives. MFC is a strong supporter of forestry best management practices and streamside management laws.

At present, MFC is providing services to several private forest landowners within the footprint of the East Valley Fuels Reduction project and participates in Firesafe Flathead. Through these projects and collaborative participation, MFC has developed a high level of working knowledge about the forests, ecology, sensitivities, and needs of the project area. The landowners who are utilizing our services in the project area are primarily concerned about hazardous fuels reduction and forest resiliency, including reducing property and structure risk from wildfire and safeguarding private lands recreation opportunities. There are also growing concerns about maintaining insurance coverage for private forest lands in this region.

The Flathead National Forest's planning for the East Valley Fuels Reduction Project creates opportunities for landowners in this project area to pursue Montana DNRC hazardous fuels reduction and Forest Action Plan grant funds to execute aligned cross-boundary treatments. For many private landowners, access to grant funding is the only way for them to afford the forest treatments that are necessary to prepare their private lands for fire and to create private land forest conditions that are wildfire resilient.

The Montana Forest Action Plan identified nearly the entirety of the East Valley Fuels Reduction Project area as zones of 'Elevated Fire Risk' and 'Degraded Forest Health', the 2023 Forest Service Wildfire Crisis Strategy included this area as one of the 19 high-risk fireheds in Montana, and in 2001 the project area was nationally

identified by the U.S. Forest Service as a WUI interface community at high risk from wildfire. Any fire starting on National Forest lands in this area would have a high likelihood of quickly threatening structures, property, and human lives. The East Valley Fuels Reduction Project directly addresses community, Forest Service, and Forest Action Plan concerns by reducing hazardous fuels present on public lands throughout the project area. While immediate Home Ignition Zone treatment on private lands is important, it is only truly effective when paired with forest treatments that treat the larger WUI landscape on both public and private lands. MFC is actively treating private forest lands, and the East Valley Fuels Reduction project will address the public lands piece of the puzzle. Landscape scale resiliency requires both of these puzzle pieces to be addressed.

MFC appreciates the efforts made by Flathead NF staff in 2024 to reach out to 120 private landowners within the project area to provide educational materials and assess interest in cross-boundary efforts and private lands access to priority sites within the project area. Public awareness of this project has likely grown since that first outreach effort, and if there are additional opportunities in the project timeline to engage private landowners MFC encourages the forest to do so as 75% of outreach recipients did not respond.

As such, MFC would like to see the East Valley Fuels Reduction Project implemented to increase this community's wildfire resiliency and we are supportive of the use of a Healthy Forest Restoration Act categorical exclusion to move this project forward.

The Forest Service is not the only entity that has identified this area as a priority for fuels reduction work. The general project area also overlaps with hazardous fuels reduction work being planned by or currently executed on private lands with CWDG funding managed by MWEF, in the Bug Creek area by the National Forest Foundation, in the Bigfork area by Swan Valley Connections, and others. The need and priority is clear, and that is why there are so many simultaneous efforts.

MFC will be closely paying attention to the planned treatments in the East Valley Project that are adjacent to private lands in order to plan complementary treatments. We urge the Flathead National Forest to also invest in understanding the forest treatments being applied on private and state lands across the project landscape and to seek to match treatment types across boundaries, as we intend to do. Cross-boundary efforts, a now commonly accepted and endorsed approach to forest management, will allow for the creation of more contiguous field breaks. Connecting treatments will serve to reduce potential for changes in wildfire behavior across ownership boundaries, improving opportunities to manage fire if it were to move through this landscape. To facilitate cross-boundary efforts across Forest Service and private lands, MFC has seen considerable landowner interest in exploring Wyden Authority partnerships within the Rumbling Owl project area to the south of the East Valley Fuels Reduction Project, and we encourage Wyden Authority partnerships to be explored for the East Valley Project as well.

Economic margins on timber projects in our region are extremely narrow, and we encourage the Flathead to structure this project in a way that emphasizes utilization of even small diameter class trees. Presently this is planned for the project treatment units in Inventoried Roadless Areas, but should be extended to all treatments across the project. Small diameter trees can be used as firewood, pulp, laminated products, as well as post and pole material. There is potential for a local CLT facility to open in our region during the planned timeline of this project, and this facility would provide an additional destination and revenue stream for material harvested from the East Valley Fuels Reduction Project.

Other entities have included recommendations in their scoping comments to reduce the use of firm prescriptive restrictions for treatment units to instead use an approach that focuses on descriptive end results. Rather than prescribing what types of equipment operators have to use, soil condition parameters and objectives could be provided. This will allow operators to evaluate how best to

achieve the objectives and reduce limitations that might be caused by requiring operators to use very specific equipment. This project currently contains several treatment units planned for cable harvest, but may be treatable by ground equipment such as fellerbunchers to make cable yarding more efficient or through tethered-assist equipment. It may also be appropriate to allow ground skidding to be used on slopes over 45%. MFC supports these suggestions. Having this flexibility will allow a broader range of contractors to consider bidding, and will likely increase the economic viability of this project.

We also encourage consideration of use of designation by prescription, particularly given Forest Service staffing challenges and the proximity of the project treatment units to private property. Designation by prescription will increase project efficiency during the pre-sale and sale prep phases. Since designation by prescription eliminates pre-operation tree marking it will reduce project unsightliness for adjacent private land owners and the public who are passing by project units.

Thank you for the opportunity to scoping comments for the East Valley Fuels Reduction Project.

Sincerely,

Zachary Bashoor
Founder and CEO