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January 15, 2025

Granite Moccasin

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Rob Davies, Project Leader

Mineral, Sanders, and Powell Counties (Counties) have entered into Memorandums Of Understandings to work together to assist in the formulation of federal agency planning and project development. The commissioners have identified that most issues facing all three counties are similar, if not identical and the issues set forth in the Mineral County Resource Use Plan apply to most the lands in Sanders and Powell Counties as well. Together these counties encompass 4,054,991 acres and represent over 25,000 people in western Montana.

The Counties have a long history of promoting aggressive management practices that increase the pace and scale of forest restoration and preservation within the WUI to improve public and firefighter safety, protect critical infrastructure, and protect lives and property. We support changes to Forest Plans through Plan Revisions or Amendments that will establish a specific Management Area (MA) for the WUI that recognizes established Community Wildfire Protection Plans and prioritizes management actions within the WUI above other overlapping MA's that may exist. In order to maximize the benefits of treatments within the WUI, we recommend reducing tree density to a basal area of 40 cubic feet per acre, removing or managing all hazardous ground fuels, and reducing ladder fuels while preserving sufficient stocking levels of second growth stands to provide the opportunity to create a long range plan for recurring activities to maintain desired conditions.

The Secretary's Memorandum 1078-006, the Associate Chiefs Implementation Letter, and the National Active Forest Management Strategy provide direction mandating the removal of timber and hazardous ground fuels and the development of safe road systems to provide safe ingress and egress for public and firefighter access to protect of life and property.

The National Active Forest Management strategy "fulfills direction from Executive Order 14225, Secretarial Memo 1078-006, and the Forest Service Associate Chief 's letter on implementation of Secretarial Memo 1078-006". These policies provide directives that support the Purpose and Need and proposed action for this project, here are a few examples:

1. "Combined with overgrown forests, a growing number of homes in the wildland-urban interface, and more than a century of rigorous fire suppression- have all contributed to what is now a full-blown wildfire and forest health crisis".
2. "Reduce wildland fire risk to communities, critical infrastructure, or key ecological values".
3. "Reduce/mitigate post fire risks needed to protect communities, critical infrastructure, or key ecological values".
4. "Reduce hazardous fuels to help make wildfire response, as well as ingress or egress, safer and more effective".

While we recognize and appreciate the management skills the Forest Service has with identifying the need for action and determining specific management activities needed to address that need, local governments and industry partners have special expertise, knowledge, and experience with strategies and techniques needed to implement and accomplish the work. Local governments through sub-division review, health and safety regulations, building permits, and other governance tools can facilitate or mandate these actions on private lands in the WUI. They understand local customs, cultures, and history critical for securing public support and developing mitigation strategies to successfully implement the management activities. County and Forest Industry partners want to have a more active role in (more than just commenting after planning or project activities are identified) in project planning and development. The National Active Forest Management Strategy and associated Executive Orders, Secretarial Memos, and Implementation letters direct this action. Here are a few examples.

1. "Build capacity through workforce alignment and partnerships".
2. "I expect line officers to work with States, Tribes and Counties to establish priorities and identify opportunities to share resources for execution of regional and national active forest management strategies",
3. "find additional opportunities to work with states, counties, tribes and non-governmental partners to increase

our active forest management activities on the ground.

If the forest has not reached out to local industry and county partners, we respectfully request that you do so. This will encourage local governments to facilitate achievement of management goals within the WUI. We believe it is incumbent upon the Forest, industry, and local governments to work together in partnership to develop projects that accomplish Forest Service goals, address local government concerns, and provide industry with an economically viable project designed to meet industry needs and accomplish Forest Service goals.

The Granite Moccasin Project (Project) encompasses approximately 67,536-acres of which approximately 30,380 acres are located within the WUI identified in Flathead County Community Wildfire Protection Plan (CWPP). We appreciate the fact that the Forest utilized information from the CWPP in refining the projects Purpose and Need and identifying potential treatments and treatment locations. Approximately 1,595 acres of the Project area were identified as "priority areas" within the Montana Forest Action Plan for high fire risk and forest health concerns. We appreciate the Forest's actions identified to improve forest conditions within these areas as well.

The purpose and need of the Project is derived from the differences between the existing landscape conditions and the desired conditions described in the forest plan. We support the three actions identified in the Purpose and Need with a few suggested changes and additions:

Purpose and Need as proposed in the Project:

1. Reduce tree densities and fuel loadings in the wildland-urban interface to result in less intense fire behavior near communities and facilitate safe wildland fire operations.
2. Improve the diversity and resilience of terrestrial ecosystems and vegetation.
3. Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local economies.

Suggested Changes and Additions to the Purpose and Need:

1. We suggest this change; Reduce tree densities to a basal area of 40 square feet per acre and remove hazardous ground fuel and ladder fuels in the wildland-urban interface to result in less intense fire behavior near communities and facilitate safe wildland fire operations to protect life and property.
2. We suggest; Improve and preserve the diversity and resilience of terrestrial ecosystems and vegetation.
3. Suggested change; Provide a mix of forest products to contribute to local and national economic sustainability and providing jobs and income to local economies.
4. Add; Commercial and non-commercial treatments and outcomes are designed to comply with mandates and guidelines set forth in the National Active Forest Management Strategy and the Forest Plan.
5. Add; Work with local governments to facilitate management upon public and private lands within the WUI.

As proposed, the project will treat 2,364 acres commercially and 2,325 acres non-commercially. Together, the Project proposes treatments on less than 7 percent of the project area. While we are not familiar enough with the project area to offer any specific suggestions, with all the guidance provided from the National Active Forest Management Strategy we are surprised the Forest is not proposing more acres for treatment. We support the proposed Treatment but respectfully request the Forest to work with local governments and industry partners to identify more acres for treatment.

Thank you,

Willy Peck, Natural Resource Advisor

Mineral, Sanders, and Powell Counties

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