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Organization: Montana Department of Natural Resources

Title: Southwestern Land Office Area Manager

Comments: December 20, 2021

Jennifer Hensiek, District Ranger

Missoula Ranger District

24 Fort Missoula Road

Missoula, MT 59804

Re: Montana Department of Resources and Conservation, Comments and Request for Interested Party Status for the Wildfire Adapted Missoula Project

Dear Ms. Hensiek:

This letter provides comments on the Wildfire Adapted Missoula Project during the objection period. The Montana Department of Natural Resources (DNRC) supports the draft decision and is not objecting to the project. However, DNRC is requesting Interested Party status in the event there are objections to this project. DNRC has fire protection interests in this area and manages state trust lands in the vicinity. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.

The Draft Decision and Environmental Assessment for this project describe a comprehensive, community-based approach to reducing risk and adapting to wildfire. The project analysis uses the most current science and modeling to assess risk and to design effective treatments. The project is tied well to the Cohesive Strategy. It represents a proactive approach by the Forest Service to do their part to return fire to the landscape and reduce intensity of wildfires on national forest lands. While the proposed treatments are on national forest lands, the draft decision provides a strong commitment to continued collaboration with the community and partners to reduce risk on all lands in the area.

DNRC supports the alternative selected for this project (Modified Proposed Action). This alternative will authorize 99,227 acres of important treatments over the next twenty years to reduce wildfire risk and protect communities. This amounts to about 56% of the planning area to be treated in two decades. The proposed treatments are strategically placed to reduce the intensity and severity of fire to facilitate safe fire suppression and reduce the likelihood of fire and embers reaching the community. However, additional treatments will be needed during and beyond the project time frame to provide conditions that effectively protect firefighters and communities, and

safely re-introduce fire through prescribed burning.

In the final decision it would be helpful to clarify the distinct role this project has with regard to the national Cohesive Strategy. There should be a clearer picture of what this work will achieve and how it will fit together with work by private landowners in the home ignition zone to better protect the community. The Forest Service's work to reduce stand densities and return fire to the landscape will restore vegetation diversity, habitat quality, and ecological functionality. It will also contribute to community protection by increasing options for safely managing fires threatening the community. From the public comments, some are interpreting the strong emphasis on community protection as an implication that the landscape treatments by themselves will protect the community. The final decision should clearly describe how the landscape treatments provide ecological benefits, and contribute to community protection, but will need to work together with strong actions by private landowners in the Home Ignition Zone to effectively protect the community.

DNRC looks forward to working with the Missoula District in implementation, including in developing the details of the treatments on national forest lands and in coordinating with treatments on state and private lands. DNRC has programs to assist private landowners in the area with treatments on their lands. For treatments on national forest lands, consider the use of the Good Neighbor Authority (GNA) which can add capacity for implementation and retain timber revenue to help fund additional restoration projects.

DNRC provided a previous comment urging the District to go beyond sharing implementation details with stakeholders (as stated in the Implementation Guide) to active coordination and collaboration with stakeholders to determine the location, timing, and potential for cross boundary work with the treatments. In the Response to EA Comments (p. 43) you say, "We agree that continuing to discuss and coordinate current and future projects with partners and neighbors is important[cedil] and we will continue this work annually." With the broad planning perspective of the EA, and the need for treatments that cross boundaries, it's critical that the District follows through with the inclusion of stakeholders in the development of annual treatment plans to implement the EA.

Because of our strong interest, DNRC is requesting to remain an "interested party" regarding objections to the Draft Decision. If changes requested by another party present the potential to reduce the ability to meet wildfire risk and forest health goals, or adversely affect DNRC's fire protection of state and private lands, DNRC requests participation in objection resolution discussions.

DNRC is committed to continuing a positive working relationship with the Lolo 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 and watershed management and restoration, benefiting both agencies' missions.

Sincerely,

Mike O'Herron

Area Manager, Southwestern Land Office

Montana Department of Natural Resources and Conservation

Cc: Amy Helena- Acting Missoula Unit Manager ; Stephen Kimball, Local Government Forest Advisor

Objections Reviewing Officer, Northern Region Forest Service