

December 10, 2021

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

To Whom It May Concern:

This letter provides the objection comments to the Draft Decision Notice of the Wildfire Adapted Missoula Project (WAM) of the Missoula Ranger District by the Lolo Restoration Committee (LRC), a diverse group of individuals promoting sustainable management and restoration of the Lolo National Forest. We have been observing and commenting about the WAM project during its entire period of development and have submitted written comments on the project, including our letter of June 1, 2021, submitted to the project leader.

We wish to emphasize at the outset that our overarching response to the WAM project is positive. Although we generally support WAM and the Selected Action described in the WAM Environmental Assessment (EA) and the Draft Decision Notice, we believe this description is incomplete and could be improved by both an amplification and modification of specific details regarding the project's guiding purposes, its treatments, and potential outcomes. Specifically:

- In our view, the primary goal of WAM is the restoration of ecological processes and functions in the forest. This will in turn lead to positive outcomes for both people and the ecosystems on which we depend. The only action that can accomplish this goal is the encouragement of a return of fire to these forest ecosystems, as fire uniquely creates the conditions for a healthy, resilient forest. Reintroducing fire, such as prescribed fire and managed natural fire, under circumstances where we can exert a reasonable level of control is the tool that should be front and center in this decision.
- We hope that the EA and Decision Notice can be reframed so there is a clear expression of the need for both active forest management and homeowner/private landowner responsibility in protecting what we like to call the forest community – the place where people and natural systems co-exist. Engaging in a counter-productive, either-or debate on whether just treating fuels in the Home Ignition Zone (HIZ) is sufficient to reduce wildfire risk or whether the most important need is fuel reduction and fire suppression in wildland forests gets us nowhere. The Cohesive Strategy clearly articulates the need for both, which we support as foundational to this decision. Even if houses are spared from a high severity wildfire by appropriate, homeowner action to eliminate fuels and implement structure modifications in the HIZ, the forest around these houses could appear blackened and depauperate for a couple of decades. The other values so appreciated in this forest community – the aesthetic appearance of the forest, its

protective, regulating functions for hydrologic processes, the long term storage of carbon, wildlife habitat, and the settings for outdoor recreation (hugely important to the Missoula community) are diminished. Indeed, landowners must accept and act upon their responsibilities to actively manage the area in the immediate vicinity of their houses, but these are responsibilities of private landowners and city and county codes for the HIZ, which fall outside of the jurisdiction of the Lolo National Forest. The requirements of the Forest Service are to manage that portion of the forest community – the plants, animals, soils, etc., that allow the system to function while permitting adjacent human habitation. Again, framing this project as risk reduction appears to have been misinterpreted by some commenters as risk reduction only to save people's houses. The risk reduction necessary includes the forest community as described above, as well as risk to firefighters, the risk of flood and debris flows, damage to infrastructure (including water and sewer systems), utility structures and more. The flip side of risk reduction is the enhancement of forest community resilience by the reintroduction of fire as an essential ecological fuel reduction process for reducing wildfire intensity and severity.

- The challenge here lies in the need to restore fire's role in the ecological functionality of the forest while respecting the human-constructed portion of the forest community. In simple terms this means mitigating the effects of potentially high severity fires that can occur under extreme fire conditions (high temperatures, drought, and storm events) that unfortunately, are becoming more common. We believe this requires thorough, ongoing, coordinated management on all lands in the forest environment, a partnership between private landowners, other public landowners, and the Forest Service. Paradoxically, it requires more fire in the Missoula valley, not less.
- Since future wildfires under extreme conditions are inevitable, we believe it is very positive that the WAM project lays out treatments that can reduce severe wildfire's most far-reaching impacts. We appreciate that the Selected Alternative designed treatments to reduce fire severity through both mechanical and non-mechanical means, following the best available science that indicates that stand density reductions and the removal of ladder fuels are necessary to allow prescribed and managed natural fire to occur. Many of the treatment areas are too dense with trees to allow for safe burning and achieve the desirable results. Widespread actions as outlined in WAM will, in our view, advance both ecological and human centered values, including the maintenance of hydrological processes, the protection of ecological linchpins such as large, old trees and forest soils, the promotion of natural adaptive responses to climate change, and the widely shared interests of Missoula residents to appreciate and enjoy the forests that surround them. We understand that this means forest harvest operations, and we recognize it is prudent, practical, and desirable in some cases to make these commercial timber sales/stewardship contracts. The utilization of some of this material makes many of these actions feasible both physically (by removing ladder and crown fuels) and financially (by providing some revenue to help cover some of the costs associated with reintroducing fire to the landscape). However, the Forest Service must articulate that these actions are also simply the prerequisite to allow low to moderate severity fires to

return (either prescribed fire or managed natural fire) with regular frequency, as the actions are not an end to themselves.

- The actions needed to return fire to these forest ecosystems while constraining the severity of unanticipated fires demands a major expansion of on-the-ground work. The EA appropriately notes that roughly 90,000 acres will receive treatment in a project area close to a quarter million acres. We believe that this should be stated more clearly in the first several sentences of the Draft Decision Notice. Also, the EA and Draft Decision Notice are not terribly clear on how the work will be sequenced across the various parcels of National Forest land in the project area. The excellent details of the treatments in the Blue Mountain area help people envision how this work may be manifest in this location, but the ability for people to understand the characteristics of project implementation in other areas might be improved through a more robust set of implementation plans/descriptions. These details may not be needed immediately but knowing when they are forthcoming and how the entire project may roll out over time would be helpful.
- Finally, as we mentioned in our June 1, 2021, letter, the LRC would like to see additional detail regarding the organizational and financial commitment to monitoring the effects of WAM treatments. It would be good to see in the EA how effectiveness monitoring of the impacts of treatments might inform mid-project modifications or the frequency and intensity of anticipated repeat treatments.

Again, the LRC applauds the Missoula Ranger District and the Lolo National Forest for undertaking the WAM project and offering a science-based, ambitious approach to restoring our forests. We look forward to continuing our engagement to make the best decision possible for the benefit of our forest community.

Sincerely,

James Burchfield and Michael Schaedel, Co-chairs, Lolo Restoration Committee