September 8, 2023

Matt Anderson, Forest Supervisor

Bitterroot National Forest

1801 N. 1st Street

Hamilton, MT 59840

Re: Comments on Bitterroot Front Project Draft Environmental Assessment

Dear Mr. Anderson:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA )for the Bitterroot Front Project. The Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands in the area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana’s forest landscapes.

The Bitterroot Front Project presents a critical opportunity to return fire and increase vegetation diversity over a large landscape on the eastern face of the Bitterroot Range. Past fire suppression and management have resulted in dense, homogenous stands in warm-dry forests that are currently at high risk to uncharacteristic wildfire and insect and disease outbreaks. Fires igniting within or near the planning area can threaten state and private lands and Communities at Risk, including Florence, Stevensville, Victor, Pinedale, Victor, Corvallis, Hamilton, Darby, and Conner. The Bitterroot National Forest contains five of the 250 highest-risk fire sheds in the nation; four of these are in the Bitterroot Front project area. The Montana State Forest Action Plan (MFAP) has identified the areas having high wildfire risk to communities and infrastructure and significant forest health concerns. The MFAP also recognizes Ravalli County as among the highest risks counties in Montana with regard to potential for wildfire impacts.

DNRC supports the purpose of the project which aligns strongly with the State of Montana’s interests.

1. Reduce fire behavior and intensity by reducing the fuel quantity, modifying the arrangement of the fuels, and reducing the current and future wildfire risk to people, private lands, and resource values.
2. Improve forest landscape health and resilience by reducing the risk or extent of, or increasing resilience to, insect and disease infestation.
3. Reduce the risk to first responders and raise the probability of success during direct and indirect engagement on wildfires by treating fuels to modify fire behavior and increasing operational opportunities to protect values.

The Environmental Assessment (EA) effectively discusses the conditions, alternatives, and effects of the project and sets the stage for critically needed action in this high risk area. We appreciate the excellent work of the Interdisciplinary Team with the analysis and discussion in the EA.

DNRC offers the following suggestions for the final EA and decision:

Chapter 1:

The Introduction says, “the project’s primary purpose is to reduce the risk of a stand replacing wildfire and return the forest to a healthy and resilient ecosystem.” We recommend adding that these treatments on national forest lands will work together with projects on state and private lands to restore forest conditions, reduce risk, and protect public safety.

The Background section identifies a large portion of the planning area as within the Community Protection Zone (CPZ). These are areas where hazardous fuel conditions put communities at exceptionally high risk of damage from wildfire. In the Fire and Fuels report there’s a map showing the Community Protection Zones (Figure 8). Most of the planning area is in the 50-100 % probability of an ignition spreading to private property (and impacting structures and people). This map effectively highlights the extent of the risk and where the need for treatments to mitigate risk is urgent . This map should be shown up front in Chapter 1 of the EA as an excellent visual to highlight the need for the project.

The Purpose and Need section states that modeling of current conditions shows the project area is at extreme risk of catastrophic fire. Mention that with climate change this risk is growing as Montana experiences warmer and dryer seasons. Add to the purpose and need statement that the work on this project will combine with work on state and private lands to reduce the growing risk to public safety and private property.

The Issues include concerns about Fire and Fuels Management. Add a bullet question, “ How would the project reduce wildfire risk for communities and infrastructure?”

Chapter 2:

The Proposed Action includes a table summarizing treatment types in priority areas. However, to find these areas on a map the reader is referred to Appendix B Figure 2-1 (a-d). Because location of treatments is so important we suggest displaying these maps in the EA (descriptionof proposed action) as well as in Appendix C.

The description of the commercial and non-commercial treatments emphasizes that altering stand structure is a critical step in returning fire to the ecosystem. Current stand structure in much of the planning area will not allow for safe and effective prescribed burning due to dense stands with ladder fuels and shade tolerant species.

We support the Proposed Action’s limited construction of new system roads with the requirement that there is no net gain in system roads.

We support the condition based approach for this project. This allows flexibility to apply appropriate tools to achieve desired conditions in a dynamic forest landscape. The proposed action doesn’t lock into specific treatments in specific areas but describes the suite of activities available to manage the project area over the next 20 years. The refined data sets and field work coming with implementation will allow managers to match treatments to the appropriate areas. This is an effective approach to meeting the goals of the project particularly with the emergency nature of the risk in this area.

Chapter 3:

It is stated that the project is designed to better align expected fire behavior with the historical range of fire behavior for the area. Due to fire suppression for over a hundred years the project area has missed two to four fire intervals of low to mixed severity fires which is especially prevalent in the lower elevation, warm-dry forest types. This is key information that should be highlighted in the decision. The decision should also address the more severe expected fires in the future with climate change.

In the Effects of No Action, Fire, build on the statement that “wildfires that escape initial attack would likely become larger and have the potential to damage or destroy the highly valued resources and assets in the Forest and on private land.” Add that since most homes burn due to ember wash keeping fires small will reduce the exposure of homes to ignition.

In the Effects of the Proposed Action, Fire, Cumulative Effects, build on the statement that The proposed action would complement other proposed Forest Service fuels reduction treatments within and adjacent to the project area. Add that the proposed action would also compliment work on state and private lands to reduce the wildfire risk on all lands on the west side of the Bitterroot Valley. Highlight the cross-boundary benefits of this project in the EA and decision.

In the Effects on Social and Economics it states that timber harvest increases jobs, income, and economic contributions. Can this be quantified? Is there information from the Bureau of Business and Economic Research (BBER) that can help develop projections on the numbers of jobs, income, and economic impact of this project? This section notes that the economic contributions to the forest products industry would be small and short term. However, this project, along with others planned in the region, will help retain a forest products industry crucial for sustaining future forest restoration in Montana. A statement to this effect should be added.

In the Effects on Recreation it states that this project would result in a short term reduction in recreation jobs and income, but these would recover in the long term as the forest landscape recovers from treatments. We disagree with the projection of loss of recreation jobs and income. Since the pandemic the Bitterroot, like other Forests in Montana, has experienced a surge in recreation and this seems to be holding. Elsewhere in the EA it says the effects on recreation and other forest uses would be short term displacement and potential dissatisfaction (not reduction). Ensure that all the statements in the EA on recreation effects are consistent. It is likely that most recreationists would adjust to the project implementation activities by finding other areas on the Forest to recreate. This is especially true given the excellent public information provided to recreationists by the Bitterroot Forest through public notices.

The discussion of effects of the No Action alternative with regard to the continued potential for large stand replacing fires and the high impacts to resources, public safety, and values is excellent. The decision should emphasize this.

In the Effects of the Proposed Action on Carbon Storage and Climate it says that carbon in the Bitterroot Forest remained stable from 1990-2013 suggesting that the Forest is neither a carbon source nor a carbon sink. This is not as applicable as results of new studies that show carbon in Montana’s forests is declining.

See <https://www.washingtonpost.com/graphics/2019/national/gone-in-a-generation/forest-climate-change.html>.

We agree that fire has been the primary disturbance agent influencing carbon stocks in the Bitterroot National Forest. With changing climate there will be larger, more severe fires with more emissions than storage unless significant treatments to mitigate risk are implemented.

Appendix B- Implementation Process

We appreciate that the Forest is committing to an implementation process involving the public, tribes, and partners. DNRC supports the consultation with the tribes as described. Implementation of this project would also benefit from consultation with Ravalli County which has a full time forester, and with DNRC which has the Good Neighbor Authority Program (GNA). Implementation should be coordinated with work on private lands to address the risks to all lands in this area. The County and DNRC have a range of options for educating and assisting property owners, including grant funding and technical assistance.

In addition to identifying four implementation phases of the project please discuss the rationale for sorting areas into the various phases. For example, are the highest risk areas to be treated in the first phases of implementation?

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

Sincerely,



Mike O’Herron

Area Manager, Southwestern Land Office

Montana Department of Natural Resources and Conservation

Cc: Thayer Jacques, Unit Forester; Stephen Kimball, Local Government Forest Advisor