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First name: Mike

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Organization: MT Dept of Natural Resources & Conservation

Title: Area Manager

Comments: September 7, 2019

Re: Montana Department of Natural Resources and Conservation (DNRC) Comments to the Mud Creek Project Proposed Action

Dear Project Leader:

Thank you for the opportunity to comment on the Mud Creek Project Proposed Action. The project area includes approximately 48,523 acres on national forest lands of which 17,171 acres are in Wildland Urban Interface (WUI). There is approximately 1,897 acres of private land and 166 acres of State land in the project area. DNRC has fire protection interests in this area through our County Co-op Program. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes.

DNRC supports the Purpose and Need for the project. This aligns well with the State of Montana's Forest in Focus 2.0 initiative which focuses on forest restoration and industry retention. There is a strong need to reduce the dense tree stocking and high fuel loading to lessen the intensity of fire behavior and facilitate safe wildland fire operations. It is also important to improve forest health and to address the resource and maintenance issues with the road network in this area. This project will contribute to a sustainable timber industry and to the economic viability of the local communities.

Our thinking is: The environmental analysis should include details on the existing conditions, planned treatments and expected post-treatment conditions. With the focus of this project on WUI, the treatment strategy should connect with the Community Wildfire Protection Plan and be designed for effective fire mitigation. Stands in the WUI, particularly near private property, should be opened enough for fire to drop to the ground and provide safe conditions for firefighter engagement. This may mean wider spacing and more openings than what is prescribed for other management objectives. Also, please consider the need for shaded fuel breaks along key public access roads, particularly roads accessing private property.

Our hope is that the roads analysis will identify a transportation system that retains access for fire suppression, restoration, and other priority needs. Access should be retained for state and private landowners in the area. Storage rather than decommissioning should be used where it is critical to reduce the maintained road system while allowing for future access. This maintains the infrastructure, allowing roads to be reopened without great expense.

The analysis should include detailed effects of implementing the No Action alternative. It's important to inform the decision maker and public of outcomes associated with taking no action in this landscape of dense stands and high risk to communities.

With the proximity of the project to private and state lands, there may be feasibility and financial benefits with coordinating treatments with DNRC and private landowners and sharing of information and resources.

DNRC is committed to continuing our positive working relationship with the Bitterroot National Forest, specifically on landscape resiliency, wildfire response, community protection, and sustainable forest management and access. By working together, we can more effectively work towards an "all lands" approach to forest and

watershed management and restoration benefiting both agencies' missions. This project would improve the landscape conditions and exemplify this shared stewardship approach.

Again, thank you for the opportunity to comment.

Sincerely,

Mike O'Herron

Area Manager, Southwestern Land Office

MT Department of Natural Resources and Conservation

CC: Thayer Jacques, Unit Manager; Stephen Kimball- Local Government Forest Advisor