

Data Submitted (UTC 11): 4/10/2023 2:34:39 PM

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Comments: Thank you for the information on further management in our National Forests in Montana. I agree with getting work done in our forests and using prescribed fire as a tool. In the first paragraph you state that "Prescribed fire is the most important action " that you can take to be effective against the current wildfire crisis, however, there have been many studies showing that commercial and precommercial thinning in various forms followed by fuel management in various forms is the best way to reduce the real impacts of stand replacement fires as well as lower the intensity of wildfires across the landscape. This allows us to fight the fires, reduces the extreme safety issues to people and communities, and allows for more survivability of our forests and vegetation after a wildfire goes through these types of managed stands. Thinning across all size classes, species, and vegetative types is beneficial to all that are left to prosper. Improving specie composition as well as diversity of vegetative types is a win win for all. All forms of vegetative management should be looked at in these proposed areas, fire alone or only working with sub merch vegetation is not the answer to meet the goals and objectives of management on these forested and or rangeland parcels. The environment we work and play in is always changing and we need to be versatile in our management goals and objectives and see what the ecology is doing per each microsite and help it along its current path as it has adapted to the current conditions and will reach its best growth and yield if we see where it is today and mange to that. Time and conditions are guaranteed to change and we need to adapt, that doesn't always mean looking at the historical record, for which we only have at best 200 years. During past times the conditions might have been different and favorable to the vegetation that existed then. It still survives and we can manage those stands, but we have newer revived and regenerated stands that have adapted to current conditions waiting for the help to strive further and healthier into the future. Along with this management process, we have suppressed fire for very real reasons and our forests have become more diverse and density levels have increased as you have mentioned. We should enact sound management as mentioned above and strive to mechanically simulate wildfire to thin all types and sizes to create mosaic patterns on our landscape and continue to work next to existing or past management and wildfires as you addressed, which is a great idea. Also, we should focus on using existing travel corridors to lessen costs and work from high person use areas to low person use areas for the public recreational use. We need to continue to use mechanical means first to simulate fire and then if needed use prescribed fire to strengthen and stimulate the projects overall goals.

The drawbacks to prescribed fire without commercial and precommercial thinning are higher intensity burns due to high downed woody debris and duff with too much fuel causing cambium heat which can cause delayed death, 1-20 years, and for crown scorch from heat and sometimes crown fire due to abundance of fuel and ladder effect. This situation also invites pathogens as trees get stressed due to the issues above and the trees attract the pathogens and they can get a foothold in an area that might not have had those previously, creating a possible problem for years to come, as seen in my career. Another side effect is scorched bowls or stems of merchantable timber, if this happens you then have a timber sale or a salvage after the burn that was too hot which damaged the stand. I have experienced that the black and burned stems might not be salvageable into the wood products markets, and now the commercial product is not marketable. Although fire will stimulate and rejuvenate stands and vegetative types, without doing mechanical treatments pre fire, the economics of the project along with the overall look and feel will change the outcome as well as make the challenge of meeting the intended goals for the public more difficult to attain. Bottom line is that we need to do more work in our National Forests and you are moving in the right direction, however, fire alone will not attain the best goals of our forests and mechanical treatments of vegetation in commercial and noncommercial aspects of what you are proposing will give you more tools in the toolbox, improve the revenue options, increase the public involvement with work and infrastructure, support communities and jobs, and make meeting your overall goals more attainable in the long run. Every forested or vegetative microsite out in our public land system is unique and we need to look at it as it is today and evaluate where it came from, where it is, and where it wants to go, and help it along with a number of management options so that it survives and thrives into the future for other generations to come, that means

leave no management tool out of the box. Commercial and precommercial products should be generated and utilized within these management goals and objectives to benefit all involved. Thank you for your time and consideration in the management of our Federal Lands.

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