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First name: David

Last name: Atkins

Organization: Montana Forest Owners Association

Title: President

Comments: The Montana Forest Owners Association is a 501c-6 organization focused on advocating for the rights and responsibilities of ~ 28,000 forest landowners in Montana. Almost 4,000 of them have participated in the MSU Forest Stewardship training program. We own our lands for a wide range of values, wildlife habitat and viewing, privacy, recreation, primary or secondary residence, timber harvesting and more. We recognize that wildfire, insects and diseases do not respect property boundaries. A recent survey of forest landowners (2022) indicates that ~75% of us are interested in cross boundary cooperation with neighbors to achieve landscape level treatments to make our and surrounding forests more sustainable, resistant, and resilient in the face of drought, wildfires, insects and diseases.

We agree with the LNF assessment that much of the Lolo is at risk of these disturbances and needs intentional management through harvests, hand thinning, and prescribed burning to reduce the risk of large, severe wildfires, insect, and disease outbreaks. Larger wildfire suppression actions in the form of large machinery created firelines, large burnout operations can result in severe effects on the forest regardless of property ownership. We feel proactive management is vital to reducing those effects and the necessity of using those more impactful techniques. Longer fire seasons with higher temperatures and lower humidity make this risk greater and thus warrants more action.

Since many owners land exists between the national forest and communities, homes, infrastructure like powerlines, communication sites we have a keen and vested interest in national forest management as well as interest in efforts to mitigate risks to the public's land and our lands. The use of mechanical, hand and planned fire treatments are essential across boundaries as the plan acknowledges on pages 29-31 and in appendix 3 that discusses possible management actions on pages A3-12 to A3-15. We appreciate what is proposed and have the following suggestions to strengthen the LMP.

*PODS are mentioned in appendix 3, discussing the importance of pre-planning developed with close participation of adjoining and nearby neighbors. We believe this should be included in the LMP as an objective. The more collaborative work between neighbors prior to a large wildfire event the better equipped an incident management team will be to conduct operations in ways that minimize the damage to the land. It also can increase the trust and confidence of landowners nearby.

*On A3-14 the use of shaded fuel breaks is discussed as a potential action, but it doesn't mention the use of SPLATS. Narrow fuel breaks are often crossed by ember storms, whereas the use of spatially arranged landscape area treatments facilitates a change in fire behavior (ember storms) and thus increasing the potential success of suppression actions. (Colt Summit and Colt Fire) As a large landowner the Lolo has the space to create these SPLATS at scale. We encourage you to include a discussion of these techniques in guidelines and appendix 3 in conjunction with the formation/identification of PODS.

*We are concerned the language "to allow fire to play its natural role in the landscape" in guideline 06 on page 31 is fraught with the potential for miss-interpretation. We acknowledge fire is an inevitable and sometimes desirable feature of the landscape. However, we want fire used to achieve the desired conditions on the public's forest and our forests. We want to tilt the scale in favor of less severe fires, especially on MA 4, 5 as well as places where MA 3 is close to adjoining ownerships, whether private, state or other federal lands. To some people the statement in Guideline 06 of allowing fire play its "natural" role in the landscape can mean allowing all fires to burn as they will or that only lightning ignitions qualify. Given the current state of the landscape as identified in the assessment this interpretation can result in unnatural or at least extreme fire effects that are undesirable. We believe that to live with fire we need to use all the tools available to have fire play its essential role in reducing fine fuels, rejuvenate habitat and other beneficial effects with a minimum of the negative effects. We believe this requires intentional management actions, not unlike Native Americans did before Europeans arrived. Was their use of fire "natural"? They used fire liberally to create conditions favorable to their goals of minimizing risk to their

communities, creating favorable habitat to the plants and animals they relied upon for food, medicine, heating, cooking and homes. Modern life does not allow for this same manner of use, so we must use fire and mechanical treatments in ways that protect life and property. "Natural" is not a universally understood term with different meanings to different people. We encourage you to use more clear language describing the use of fire, both planned and unplanned ignitions.

*As the largest forest managers in the area, the Lolo NF has a large share of the responsibility to assure a predictable, reliable supply of timber to maintain the milling infrastructure. Wood manufacturers, whether post and pole, sawlog or residual producers are essential to restoration, wildlife habitat improvement, wildfire fuel mitigation, creating resilience, etc. It is more than an economic variable to be considered. Desired conditions 01 on page 29, hints at this reality when it states, "The full range of fire management activities are recognized by forest administration as an integral part of achieving ecosystem sustainability..." However, it requires the reader to infer those harvests prior to planned burns is part of the "fire management activities". This should be explicitly identified, so you aren't in court trying to explain to a judge that's what was meant.

*We believe a more aggressive approach to landscape scale harvests and burning are needed to address the potential for severe wildfire over the next 10 to 20 years. The wood products industry is critical to achieving this scale of work on federal, state, county and private lands.

*Most small landowners are not skilled in broadcast burning. Given the Montana Forest Action Plan, the new Montana Prescribed Burn Council, operating under the auspices of the Montana Forest Action Council, goal 03 (p.30) should encourage the use of "Wyden Authority" to be used to conduct larger cross boundary burns with tribes, private lands and the state. We think an objective should be established to develop multi-agency, ngo agreements and contracts with private businesses to facilitate the mobilization of resources to accomplish prescribed burns in the same vein as exists for fire suppression. Many (not all) private landowners would consider participating in these kinds of treatments.

*The use of unplanned ignitions in MA's 1, 2 and 3 is disconcerting to many landowners because of the potential for them to exceed the intended areas. Expanding the section on pages A3-13 and 14 on the development of PODS using SPLATS along with natural features and recent fire boundaries can substantially reduce the risk of unintended consequences. We would like to see some direction in the objectives and guidelines as well as in appendix 3 to achieve these types of treatments in locations to mitigate the risks.

We thank the Lolo NF staff for the work on this plan and look forward to its completion and then implementation. These are perilous times for landowners and managers alike. Prophylactic action at the appropriate scale is sorely needed.

The Board of Montana Forest Owners Association