

Data Submitted (UTC 11): 11/29/2022 7:00:00 AM

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Comments:

DEPARTMENT OF NATURAL RESOURCES
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November 29, 2022

Ron Hecker, District Ranger

Ashland Ranger District

P.O. Box 168

Ashland, MT 59003

Re: Montana Department of Natural Resources and Conservation, Comments on the South Otter Draft EA

Dear Mr. Hecker,

Thank you for the opportunity to comment on the Draft Environmental Assessment for the South Otter Landscape Restoration and Resiliency Project. The project area encompassing 318,800 acres is located about six miles south of Ashland. There are approximately 26,000 acres of private lands within the planning area. The Department of

Natural Resources and Conservation (DNRC) manages State Trust Lands in this area and assists private landowners in the area with treatments on their lands. DNRC has fire protection interests in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

Portions of the areas proposed for treatment are within the Wildland Urban Interface (WUI) addressed by the Powder River and Rosebud Community Wildfire Protection Plans (CWPP's). This project is not only important for the national forest system lands but also for the state and private landowners in this area. Portions of the planning area are mapped as Priority Areas for Focused Attention in the 2020 Montana Forest Action Plan due to risk for uncharacteristic wildfire.

DNRC supports the Purpose and Need for the project which includes: 1) restore ponderosa pine ecosystems; 2) reduce fuel loadings to enhance fire suppression capabilities; and 3) provide wood products to contribute to employment and industry in local communities and support a sustainable timber supply.

DNRC supports the treatments included in the Proposed Action. The proposed 184,150 acres of prescribed burning, 26,350 acres of commercial thinning, 11,165 acres of non-commercial thinning, and 39,940 acres of reforestation would significantly improve forest conditions and reduce hazards on this landscape. The treatments proposed for 10-20 years of implementation align well with the goals and strategies in the State's Forest Action Plan. These treatments will restore diversity of forest structure and vegetation. Restoring wildfire on the landscape at the scale proposed is necessary in this fire-adapted ecosystem. The reforestation will re-establish desired levels of tree stocking in areas of past fires that lack seed sources.

DNRC has programs to assist private landowners in the area with treatments on their lands. We support the South Otter project as an important part of the cross-boundary work necessary to achieve our shared stewardship goals for improving forest health and reducing fire risk across Montana's forested landscapes. We look forward to working with the Custer Gallatin National Forest to implement this project. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.

Sincerely

Chris Pileski, Area Manager, Eastern Land Office
MT Department of Natural Resources and Conservation
CC: Stephen Kimball- Local Government Forest Advisor,