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Comments: Thank you for the opportunity to comment on the Proposed Action for the Helena-Lewis and Clark Forest-wide Prescribed Fire Project. The Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages the State Trust Lands 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.

DNRC recognizes the dramatic need to increase the pace of fuel reduction work to reduce the impact of high severity fire. Successful implementation of the USFS ten-year wildfire crisis strategy requires the agency to reduce individual project planning through appropriate analysis of like programmatic activities as proposed in the Lewis and Clark Forest-wide Prescribed Fire Project. DNRC applauds this effort to act more quickly.

DNRC supports the Purpose and Need for the project which includes reducing the risk of uncharacteristically severe wildfire and influencing how wildfire and other disturbances will shape the landscape and impact local communities. Returning fire to the landscape is needed to reduce high fuel loads and non-native grasses. Many areas on the Forest are set up for large-scale, severe wildfires that can lead to loss of forests across landscapes, soil productivity, viewsheds, and habitats. Returning fire regimes to approach natural conditions using prescribed burning is important for managing fire risk and also is an important adaptation strategy for climate change.

DNRC supports the proposed action which is to authorize prescribed burning, hand treatments and mechanical treatments of vegetation across the Forest (outside of designated wilderness) in areas needing restoration or maintenance. Introduction of fire to the landscape is the most cost effective tool at the Forest's disposal and prescribed should be used when possible, based upon a high probability of success and low probability of escape.

Safe and effective prescribed burning requires advance preparation such as thinning and ladder fuels reduction. Thinning followed by burning reduces fire spread and intensity. The proposal to thin small diameter trees, rearrange fuels with hand tools and/or mechanical equipment, and follow with prescribed burning on no more than 20,000 acres per year is an ecologically sound plan for the Forest.

DNRC supports the forest-wide approach and conditions and prioritization of project activities. This will result in treatment of areas with the highest risk to communities and values and with the highest probability of success. DNRC supports the priorities identified for Geographic Area Groups, including the lower elevation ponderosa pine and Douglas-fir forests for the Jefferson Division and the considerations listed for the other groups. The implementation process and timeline are appropriate and includes a strong component of agency and tribal coordination and public involvement.

The proposed action aligns with the goals of the Montana Forest Action Plan which emphasizes reducing wildfire risk and improving forest health across boundaries, and retaining a strong forest products industry as capacity for future forest restoration. The project would benefit communities in Broadwater and Meagher Counties which have a high proportion of federal lands in their land base.

DNRC is committed to continuing a positive working relationship with the Helena-Lewis and Clark 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 both agencies' missions.