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Comments: Thank you for the opportunity to comment

DNRC Northwest Land Office Subject: Department of Natural Resources and Conservation Comments on East Valley Fuels Reduction Project Dear Ranger Dowling: Thank you for the opportunity to comment on the scoping for the East Valley Fuels Reduction Project. The Montana Department of Natural Resources and Conservation (DNRC) strongly supports this project. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana. The East Valley Fuels Reduction project located along the Highway 83, Foothills Road and Highway 206 corridors on the Swan Lake and Hungry Horse Ranger Districts, Flathead National Forest, is a critical project for the communities of Bigfork, Creston, Columbia Falls, and surrounding areas. We agree a reduction in fire behavior near communities within the wildland-urban interface (WUI) needs to occur to facilitate safer, more effective wild land fire operations. Providing spatially connected fuel reduction treatments to modify fire behavior and increase firefighters' chances of reducing impacts while at the same time improving forest health and promoting local natural resource jobs is something DNRC fully supports. Forest Service Chief Moore in 2023 identified an emergency with 250 high risk fire sheds. The Kalispell and Bear Creek Village fire sheds encompass 99 percent of the East Valley Fuels Reduction Project Area and were among the nineteen high risk fire sheds that were identified in Montana. The purpose of the project also aligns with the Montana Forest Action Plan as it identifies the project area as a 'Priority Area for Focused Attention' for high to very-high fire risk due to: Wildfire Risk and Distance to WUI. Because of these two factors DNRC supports utilizing the HFRA wildfire resilience CE or CFR 218.21 Emergency Situations. The Kalispell and Bear Creek Village fire sheds are in approximately 99 percent of the 2,541-acre East Valley Fuels Reduction Project Area. The proposed treatments in the project area are limited by current access from National Forest System lands, state lands, and willing private landowners and although additional areas may need treatment, they are not accessible. The primary objective for treatments in the WUI should be to reduce the intensity of fire behavior and increase options for safely protecting values at risk. To effectively reduce fire intensity, post-treatment stands should be open enough for fire to drop to the ground and not spread through the crowns. Consider adding shaded fuel breaks to enhance fire suppression and safe ingress-egress. These can be used as anchor areas for burning out to provide lines of defense near homesites, recreation areas and community assets. DNRC recognizes the need to dramatically increase the pace and scale of fuel reduction work to reduce the impact of high severity fire and improve forest health. The Forest Service National Wildfire Crisis Strategy highlights the critical need to reduce the time involved with individual project planning through large scale and streamlined analysis. Many areas on the Forest are set up for large-scale, severe wildfires that can threaten communities, lead to loss of forests across landscapes, soil productivity, viewsheds, and habitats. It's our understanding the 2001 Roadless Conservation Rule states that timber may not be cut, sold, or removed in inventoried roadless areas (IRAs) on National Forest System lands, unless the Responsible Official determines that the removal of generally small diameter timber is needed for one of the purposes specified in [sect] 294.13(b)(1), such as reducing the risk of uncharacteristic wildfire effects. Noting that approximately 13,744 acres of the 866,330-acre Bear-Marshall-Scapegoat-Swan IRA are in the East Valley Fuels project area, we encourage the Responsible Official to look at opportunities (including hand thinning small diameter timber and prescribed burning) to reduce the potential for severe large scale, uncharacteristic wildfires and reduce carbon through emissions in the Effects Analysis. This will also reduce the potential for extreme air quality impacts with severe wildfires. DNRC supports the Purpose and Need, but outside of Inventoried Roadless in the general forest management areas, DNRC encourages the Forest to find ways to utilize trees that fall into small diameter class for lumber, firewood or pulp with smaller sizes used for post and pole material. Commercial use of wood products from thinning can offset costs and increase the number of acres treated. With only 1,686 acres of commercial treatments and 855 acres of noncommercial treatments being proposed, the number of acres treated needs to be

increased to meet the Purpose and Need, National Wildfire Crisis Strategy and Montana Forest Action Plan (MFAP). The proposed action aligns with the goals of the Montana Forest Action Plan (MFAP), including reducing wildfire risk and improving forest health across boundaries. Other goals of MFAP include enhancing local economies and retaining a forest industry in Montana. We urge you to consider a variety of ways to utilize material from this project. Though it may require funding for service contract work, removing logs for firewood, posts and poles, or other products could reduce the cost of treatment and would not only sequester carbon but also contribute to local economies. Please include the effects of the No Action Alternative in your analysis, including the continued risk and impacts of uncharacteristic stand-replacing wildfires and insect and disease outbreaks. The No Action is underutilized and can be very powerful but not if restricted to one or two sentences. DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing commercial and restoration projects on the Flathead National Forest and may have capacity to assist with implementation of this project, including facilitating acquisition of private access. DNRC is committed to continuing a positive working relationship with the Flathead 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. Sincerely, Greg Poncin Area Manager Northwestern Land Office MT Department of Natural Resources and Conservation