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Comments:

Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130, (10 E Babcock)
Bozeman, MT 59771

June 4, 2019

Dear Forest Plan Revision Team:

Secrest Fire Solutions submits the following comments on the proposed revised Land and Resources Management Plan for the Custer-Gallatin National Forest.

1. Hazardous fuels mitigation needs.

Hazardous fuels mitigation needs to be prioritized to reduce fire behavior adjacent to values at risk. With the threat from wildfire to values at risk and the increase in the number of acres which will be burned by wildfires in the future. (Objectives (FW-OBJ-FIRE) 02 Natural unplanned wildfire occurs on a minimum of 375,000 acres per decade, as conditions allow, in all vegetation types).

The range of alternatives which treat only acres (4-7000 acres per year for hazardous fuels mitigation needs to be increased significantly to make a difference. It needs to be stated that hazardous fuels mitigation needs to be a high if not the highest priority with any vegetation management project.

The Custer Gallatin National Forest manages a variety of administrative and recreational facilities. This includes 200 administrative buildings and 472 recreational buildings with all the accompanying utilities. Firewise efforts of the administrative, recreational buildings and sites need to be a high priority and completed within the life of the plan. This plan needs to show the public that the National Forest is serious about making their values at risk able to except fire.

2. The wildland-urban interface "WUI" disregarded.

The wildland-urban interface "WUI" is only briefly mentioned as a reference and not to help define priority/direction. The Community Wildfire Protection Plans "CWPP" which are developed by each county is where the "WUI" is developed /defined according to county direction. Without using the "WUI" or referencing

the "CWPP" it appears that you are taking the counties / counties officials out of one of the few ways they have of influencing treatment direction/priorities especially in relation to values at risk on the national forest.

3. Unplanned ignitions responses undefined.

Wildfire Response guide needs to be mentioned that there is one. Is seems that this plan in hiding what directions and or actions of the management of wildfires.

You need to expand on how you are going to use "A Wildfire Risk Assessment Framework for Land and Resource Management" (Scott, Thompson and Calkin 2013). Will the FSim analysis be run every year? For unplanned ignitions a decision support process is used to guide and document wildfire management decisions. I would assume presently is would be "WFDSS". Will data from this analysis be inputted in to WFDSS? Remember that WFDSS as documentation tool not a decision making analysis.

4. Management levels should not be tied to budget.

The forest plan should define how National Forest should be managed. Defining management levels in response to the current and or short-term budget projections is inappropriate.

Any questions, clarifications or comments please email or call.

Jess

Secrest Fire Solutions