GLACIER-
TWO MEDICINE
ALLIANCE

March 12, 2025

Superintendent Dave Roemer
Glacier National Park
PO Box 1
West Glacier, MT 59936

Re: Glacier National Park's Fire Management Plan and Environmental Assessment

Submitted electronically via
https://parkplanning.nps.gov/commentForm.cfm?documentID=141843

Dear Superintendent Roemer,

Thank you for the opportunity to comment on the draft Fire Management Plan and Environmental Assessment for Glacier National Park.

Glacier-Two Medicine Alliance (GTMA) is a community-based, grassroots conservation organization located in East Glacier Park on the Blackfeet Nation. GTMA is dedicated to the protection, stewardship, and shared enjoyment of the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in Montana's Crown of the Continent ecosystem, including Glacier National Park (Glacier). GTMA has a long history of involvement in advancing the conservation and science-based management of Glacier National Park, a beloved place that our approximately two thousand members and supporters' value and visit for its outstanding scenery, wilderness, native species, rich cultural heritage or other purposes.

GTMA agrees with the National Park Service (NPS) that the 2003 Fire Management Plan needs updating. On the whole, we think the draft Plan outlines a reasonable approach to managing wildland fire in Glacier over the next 20 years. We appreciate the draft Plan's attempt to allow for wildfire to continue to reclaim some of its historical ecological role and the benefit wildfire provides to many of Glacier's ecosystems. However, we think the plan is too conciliatory and sensitive to social and political pressure to limit fire severity and confine wildfires within the park via suppression. A suppression-first strategy is a fool's errand in light of climate change, nor does it reflect the best-available science or NPS mandates to maintain natural systems. Restoring low and mixed severity fire to the landscape is the only way to minimize high severity, catastrophic wildfires over longer time horizons. The draft plan is too conservative and should be revised to provide more flexibility and direction to allow naturally ignited fires to burn—

especially in seasons like August of 2024 when wet, cooler weather limited potential spread—or to utilize prescribed fire and cultural burns to help restore fire to the landscape.

We appreciate the plan's emphasis on collaboration with federal, state, tribal and non-governmental partners, including private landowners. More detail about coordination with Waterton Lakes National Park or other Canadian authorities would be helpful. Finally, we also appreciate and encourage continued education and outreach to the public as a pivotal pillar of Glacier's fire management strategy.

Additional specific comments follow.

Wildlife Fire Program Management Goals and Objectives

The four goals and their supporting objectives seem appropriate and consistent with the purpose of the plan. Risk management for fire fighters, employees, and the public should be the leading priority, as stated in Goal 1. Minimizing impacts from *fire management activities*, as stated in Goal 2 should likewise guide Glacier's approach to fire management.

GTMA particularly appreciates the inclusion of Goal 3: "Promote ecological and social conditions that create, maintain, or restore fire resilience to the landscape where the natural role of fire can function in the ecosystem" (Plan, p. 10). Fire, including natural and anthropogenic ignitions, has long played a critical role as a disturbance and regeneration force vital to the health and function of various ecosystems across what is today Glacier National Park. Decades of fire suppression have minimized fire's historical role and erased many of its ecological benefits. This has contributed to changes in vegetative composition and distribution (i.e. conifer encroachment in meadows, transformation of grasslands to shrublands, higher stand density in Ponderosa forests, etc.), which contributes—with climate—to shifts in fire regime types. As the EA clearly documents, this has resulted in an overall increase in fire severity park-wide that is contributing to ecological change (i.e. conversion of cedar forests to pine/fir dominant forests, or scorched soils delaying regeneration or shifting succession) as well as a feedback loop that increases social and political pressure on all federal agencies to actively suppress fire or mitigate fuels in a heavy-handed way. Restoring more natural fire regimes across the Park, as Goal 3 indicates, should be a goal for fire management that will in the long-run reduce fuel loads, leading to reduced frequency and severity of wildfires and improved ecological resilience to fire-caused disturbance. This goal is consistent with Glacier's mandate to protect park resources as it maintains or restores ecological health, diversity, and function at a park-wide scale. Public education and outreach, as well as collaboration with partners, including adjacent land managers like the Blackfeet Nation or Flathead National Forest, will be critical to generate social and political support for restoring natural fire regimes. However, we are concerned, as we point out elsewhere in our comments, that parts of this plan directly contradict this goal. Those parts of the plan should be revised for greater consistency with this goal.

We also greatly appreciate Goal 4's emphasis on shared stewardship, especially the inclusion of Indigenous Knowledge and practices to help restore fire to the landscape. Wildfire does not observe political boundaries and so must be managed in a larger landscape context. Tribal Nations in particular, have a unique history and knowledge they can contribute to improve overall fire and resource management outcomes for Glacier. We encourage Glacier to continue to

cultivate closer ties with Tribal / First Nations indigenous to this place in managing wildfire.

Operational Guidance

While the general range of strategies is sound, we are concerned that there is too much emphasis on suppression throughout the plan, and not enough guidance for when to allow naturally ignited wildfires to burn. Consequently, fire managers are likely to be too conservative and lean in to the "protection objectives" and other "protection" language to readily apply a control or containment strategy, rather than a confinement, point/zone protection or monitor strategy. Additional guidance should be developed to improve the weight of ecological variables, fire location, and desired resource conditions in the decision tree for which strategy to apply to a given wildfire. Without greater allowance for naturally ignited fires to burn, we will continue in this Catch-22 feedback loop of fire suppression-caused catastrophic wildfires being used as justification for greater fire suppression.

That said, we support fire suppression strategies:

- when there is an imminent risk to human infrastructure, including park properties, inholdings, and infrastructure located on adjacent public, tribal or private lands, that cannot be otherwise minimized;
- under severe weather conditions where risk of catastrophic wildfire is high and would, in the judgement of fire managers and interdisciplinary team advisors, likely result in unacceptable impacts to ecological, cultural or historical park resources, or to adjacent lands;
- for human-caused fires, other than intentionally set prescribed burns or cultural burns.

Fire suppression strategies should also be prioritized to protect non-fire adapted plant communities or other rare ecosystems in the Park with minimal resilience to wildland fire. For example, Glacier supports rare, disjunct old growth cedar and hemlock forests, especially in the McDonald Creek Valley. These forests are not well adapted to wildland fire. Given the changing climate, they are likely to be replaced by pine-fir forests should they burn. Suppressing wildland fires that threaten non-fire adapted systems like this one is an appropriate protective response for these environments. Guidance to this effect should be added to the plan.

GTMA does not agree that all wildfires in the East FMU should be managed with "only protection objectives and suppression strategies" (Plan, p.12). We recognize that social tolerance for wildfire is low due to impacts on livelihoods, personal property, or Blackfeet Nation resources. We are concerned that the legacy of conflicts arising from past fires that have burned beyond Glacier are carrying too much weight in how the NPS designs a plan that will guide fire management in this landscape for the next 20 years. The east side of the Park contains diverse fire-adapted environments, including grasslands, limber pine savannas and lodgepole pine dominated montane forests. These systems need fire to continue to thrive, and a suppression-only approach undermines the ecological health and integrity of much of the east side of the Park. It also conflicts with Goals 3 & 4 of the Plan. And it conflicts with 1998 Glacier National Park Resource Management Plan direction to "maintain the natural role of fire in the ecosystem." While allowing naturally ignited fire to burn may be more challenging on the east side of the park, it is possible. Continued investment in improving relationships and collaborative stewardship with Blackfeet Nation, as well as with private landowners, will help make it so. The

plan should be revised to provide guidance and flexibility to managers to allow naturally ignited wildfires to burn in certain situations.

We strongly support limiting the use of chemical fire retardant (EA, p. 9) to extraordinary circumstances, and only with written authorization of the Superintendent, due to the environmental and human health consequences of these chemicals.

We agree with the guidance provided for vegetation, wetlands and wildlife (Plan, p. 17 – 19).

Wildfire Management Decisions

Given the significance of wildfire to shaping plant communities and wildlife habitat, we strongly encourage the explicit inclusion of botanists and wildlife biologists, in addition to other natural and cultural resource specialists, on all interdisciplinary teams and to incorporate these teams in all fire management decisions, not just prescribed fire (EA, p. 12), as their use appears to be restricted to at present.

Decisions on whether to allow a naturally ignited fire to burn should consider future climate scenarios and their implication for future forest/vegetative communities.

Recommended Wilderness

We strongly support the plan's attempt to protect wilderness character by designing intervention strategies and tactics that use the "least impactful methods" (p. 20) for managing active fires in recommended wilderness, including limiting the use of motorized equipment. We suggest changing the phrase "minimize the use of motorized equipment and use hand tools whenever feasible within recommended wilderness…" to "minimize the use of motorized equipment and the use of hand tools to the *maximum extent feasible…".* This is stronger language that will more effectively minimize possible harms to wilderness character by fire management. Whereas the word "whenever" suggests an either/or option—something is either feasible or it is not—our suggested phrasing provides a spectrum of possible responses in a given decision context. We support the guidance on limiting installations to the minimum amount of time necessary for operations.

Additional measures are needed to guide how wildland fires in recommended wilderness should be managed. Human intervention in natural systems in wilderness is, as a matter of law and policy, to be minimized so that these systems largely reflect the forces of nature. Thus, strategy selection should prioritize the strategies "monitor" and "point/zone protection" rather than more suppressive strategies. Fires that are unlikely to burn beyond the recommended wilderness of Glacier's backcountry should be allowed to burn unless intervention is necessary to protect a federally listed species or non-fire adapted environment. Here, and in all cases, the least intensive intervention method should be prioritized.

As we discuss below, guidance for fuels management in recommended wilderness is currently lacking.

Fuels Management – Prescribed fire and non-fire treatments

To the maximum extent possible, NPS should rely on naturally occurring wildfires to achieve

resource management goals. In circumstances where that is not feasible (i.e. site conditions, risk to other resources, lack of naturally occurring wildfire opportunity), we support the targeted use of prescribed fire and, to a lesser extent, associated non-fire fuel treatments. The programmatic fuel management goals and objectives (Plan, p. 21) to restore fire to the landscape in places where fire is necessary to promote ecological integrity, including a diversity of plant communities and wildlife habitats, and/or Indigenous cultural landscapes or historic properties, are appropriate. As the plan indicates, any use of prescribed fire or other non-fire treatments should be tailored to the specific site and designed to protect threatened, endangered or sensitive wildlife species, plants and ecosystems, as well as the wilderness characteristics of Glacier's backcountry. Of the two methods, prescribed fire, or the combination of the two, should be preferred as prescribed fire better mimics the beneficial impacts of wildfire such as nutrient cycling.

In fact, we encourage Glacier to consider how it may increase the use of prescribed fire. The plan currently only identifies projects in the North Fork District to restore Ponderosa Pine savanna at Sullivan Meadow and grasslands at Big Prairie. The proposed treatment sites are appropriate given the fire history of these sites. However, we wonder if the proposed acreages are too conservative to achieve objectives. No prescribed fire treatments are provided for the East FMU, even though many of the grasslands and limber pine savannas were maintained historically by burning, including Native-set fire. If Glacier is going to follow a protective-only natural fire strategy for the East FMU, then a liberal use of prescribed fire will be a needed corollary to restore ecologically beneficial fire to the landscape.

We also support the use of prescribed fire as a restoration tool for whitebark pine stands as described in Jenkins et al. (2022)[1] and the National Whitebark Pine Restoration Plan.[2] Right now the plan takes a fully protective approach to whitebark pine for both natural and prescribed fire. This seems outdated and out of sync with the approaches taken by other federal land managers. Additional attention to if and how fire can be used to restore resilient stands of whitebark pine is warranted.

With this goal in mind, we encourage NPS to pursue co-stewardship with the Blackfeet Nation or CSKT, if and when either Tribe is interested, to restore cultural burning practices to systems where Indigenous Knowledge or other information indicate this practice was routinely utilized in the past. Returning cultural burning practices is a way to improve ecological conditions and meet resource management goals that honors NPS trust responsibilities to Tribal Nations by facilitating the restoration of a Tribe's cultural connections and sovereignty to ceded territory.

Regarding the non-fire fuels treatment portions of the plan and EA, we are concerned the guidance is presently too vague and permissive. For example, the EA sys that "Non-fire fuel treatments, or mechanical fuels reduction, would be implemented near developments or other

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[1] Jenkins et al. (2022). Restoring a forest keystone species: A plan for restoration of whitebark pine (*Pinus albicaulis* Englem.) in the Crown of the Continent Ecosystem. *Forest Ecology and Management,* 522: 120282. Retrievable at: https://doi.org/10.1016/j.foreco.2022.120282

[2] Tomback, D.F. and E. Sprague. (2022). The National Whitebark Pine Restoration Plan: restoration model for the high elevation five-needle white pines. *Forest Ecology and Management,* 521: 120204. Retrievable at: https://www.sciencedirect.com/science/article/abs/pii/S0378112722001980

values (e.g., cultural, natural, and other resources) that may be damaged by a wildfire" (EA, p. 15). Depending on a given manager's judgement, this could conceivably allow mechanical fuels reduction to be applied practically anywhere in Glacier!

Mechanical treatments may be appropriate immediately around developed areas, such as a campground, or Apgar village, to create defensible space in accordance with the best practices and departmental guidance referenced in the plan. Away from developed areas, mechanical treatments should be avoided in favor of prescribed fire. National parks should not be logged to "treat fuels", as some elected officials are demanding for our national forests, as this is inconsistent with NPS' preservation mandate. Any exception needs to be justified under clearly defined conditions, conditions that are not provided in the draft plan at present. Moreover, mechanical treatments are totally inappropriate in the ~90% of Glacier's backcountry recommended for wilderness. Here natural wildfire should be the predominant tool of choice, with prescribed/cultural burns and hand tool site preparation in limited scenarios. As a starting point, we suggest including a map and descriptions of potential treatments so the public can understand exactly what Glacier is considering as defensible space.

To that end we'd like to see a few more explicit guidelines included in the plan, such as:

- mechanical treatments using means other than hand tools will only be used to treat the minimum space necessary to provide defensible space or to meet ecological restoration goals;
- mechanical treatments using tracked or wheeled vehicles will not extend beyond 500' from an existing road or building under any circumstances;
- no new road or temporary road construction will occur to facilitate fuels reduction or defensible space;
- Prescribed fire and non-fire treatments will be designed consistent with all management plans, including the forthcoming Flathead Wild and Scenic River comprehensive management plan;
- Fuels reduction using mechanical means will not occur in Glacier's recommended wilderness. Exception: mechanical hand tools, including chainsaws, may be used to prepare a site where it has been determined that prescribed fire is necessary to restore ecological conditions or protect a sensitive species.

We support all the biomass disposal methods provided in the EA.

Post-Fire Monitoring and Research

We support and encourage actions to prevent the spread of noxious weeds or invasive species during and after wildfires and treatments. Any post-fire rehabilitation should be harmonious with the Park's mission to protect natural ecosystems. We strongly encourage the Park to implement a robust monitoring program to track how sites respond to fire as well as to implement research to benefit Glacier's fire managers. In particular, we encourage monitoring and research to better understand how fire (or fire exclusion) is affecting different vegetative communities, like the aspen on the east side of the Park, or wildlife species like lynx, moose or mountain goats, as well as to better understand how a changing climate is altering the Park's ecology and fire regimes.

Appendices not provided

While Appendices are provided for the EA, they are not provided with the draft Plan, even though the draft Plan references 14 appendices, including a multi-year fuel treatment plan that appears to contain projects already in development. A search of the Planning, Environment, and Public Comment pages did not turn up this or any other of the appendices listed in the draft Plan. These appendices should be available for public review during the comment period as they are important to understanding how the draft Plan would be implemented. We ask the Park release these appendices and provide a minimum of 14-day public comment period on them.

Thank you again for the opportunity to submit comment on this important resource management plan. We look forward to continuing to participate in this planning process.

Sincerely,

Peter Metcalf
Executive Director
Glacier-Two Medicine Alliance