

Superintendent, Glacier National Park
Attn: Fire Management Plan EA
PO Box 1
West Glacier, MT 59936

Submitted Electronically via parkplanning.nps.gov

March 27, 2024

Dear Superintendent Roemer:

The Glacier-Two Medicine Alliance (GTMA) and National Parks Conservation Association (NPCA) submit these comments on Glacier National Park's (the park) scoping brochure to update the Glacier Fire Management Plan (the Plan). We appreciate the opportunity to comment on behalf of our members and supporters to help improve this proposed native trout conservation project.

GTMA is a grassroots conservation organization located in East Glacier Park, MT on the Blackfeet Nation. GTMA is dedicated to the protection and stewardship of the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in the Crown of the Continent ecosystem, including Glacier National Park. GTMA has a long history of involvement in advancing the conservation and science-based management of the park, a place our thousands of members and supporters' value and visit for its wilderness, native species, or rich cultural heritage.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working with our more than 1.6 million members and supporters to preserve our nation's natural, historical, and cultural heritage for present and future generations. NPCA has a longstanding interest in protecting national parks and their resources and ensuring responsible science-based management occurs in parks, especially as they face the continued challenges of a changing climate.

Overview: Changing Climate/Changing Fire Regimes: Prior to the late 1900s, relatively long-interval stand replacement fires constituted the predominant fire regime type throughout the Waterton-Glacier ecosystem. However, an apparent shift toward significantly shorter stand replacement- and mixed severity fires started to occur in the 1980s as a result of shifting climate combined with effective fire exclusion during the early to late 1900s. Although much of the park area was dominated by relatively old growth forests prior to the large Red Bench fire in 1988, numerous acres have burned, and in some cases reburned, since that time—substantially altering the mix of forest age classes and beginning an apparent trend toward early successional forest- and non-forest communities. This ecological background provides the basis for the following issues and concerns relative to the proposed update of the Plan.

General Issues/Concerns for consideration in 2024:

- **Existing plan outdated:** We agree with park officials that the existing fire management plan, which was written in 2003, is somewhat outdated and needs revision with respect to such topics as ecosystem dynamics, changing climate- and fire regimes, and public values/perceptions, collaboration and coordination with adjacent land jurisdictions, and other issues.
- **Changing climate- & fire-regimes:** Specifically, regional climate change is likely to promote changing fire regimes in Glacier and surrounding landscapes, toward a dominant pattern of relatively short- to moderately long interval (50-100 year) stand replacing- and mixed severity fires, and a resultant shift trend toward more early successional forest and non-forest ecosystems. The new plan should assess how to continually adapt fire management in light of this new ecological reality.
- **Support prescribed fire program:** Support for the prescribed fire program is recommended and especially important for restoration and maintenance of grassland/shrublands, ponderosa pine, and whitebark pine ecosystems. For example, high-elevation prescribed burning would not only promote whitebark pine restoration, but also would enhance ecosystem maintenance for dependent species such as bears, various bird species, pine martens, and other species. Additionally, periodic application of understory fires would help promote the vigor and persistence of the increasingly rare old growth ponderosa pine stands in the North Fork. The park should consider increasing its annual prescribed fire use far beyond the current 100-500 acres.
- **Less focus on fire suppression:** Where terrain, fuel and weather conditions allow, the park should allow for greater ecological use of naturally started fires, rather than focusing on the suppression of 95% of fire starts (GLAC Fire Plan, 2003, pg. 3). Elimination of goal 3 and its fire management objective is needed to be able to do this. The plan should prioritize and guide management to maintain or restore natural fire regimes that support healthy, fire-adapted vegetation-types (i.e. grasslands, dry forests) or improve climate-resilience across park ecosystems.
- **Maintenance of wilderness character:** For areas of Glacier recommended for inclusion in the National Wilderness Preservation System, an important goal of the fire management plan should be to maintain Wilderness characteristics and an area's eligibility for future designation as Wilderness. Plan direction should seek to limit suppression in favor of allowing naturally ignited fires that are unlikely to become catastrophic or escape the park to burn to the maximum extent practicable so that natural ecological processes can function with minimal interference. When deciding whether to allow a naturally-ignited fire to burn in Glacier's backcountry, managers due consideration should be given to the fire-adaptions of the dominant vegetative type and historical fire regime of the site, fuel moisture and weather conditions, the location and risk the fire poses to other Park resources or adjacent lands, and other pertinent factors like air quality and resources. The park may also want to consider future climate scenarios and their implication for future forest / vegetative communities in making these decisions.
- **Application of traditional ecological knowledge:** As gleaned from historic tribal practices and oral history records, emulating traditional practices such as frequent fire use in ecosystems along the Rocky Mountain front and in the North Fork Flathead drainage

would benefit not only natural vegetative communities, but also would promote improved habitat for elk, bison, and other species.

- **Return of cultural burning practices:** As the park continues to evaluate returning fire to the landscape, identifying opportunities for returning cultural burning practices by Indigenous communities, partnered with potential co-management of those burns, will be an important chance to bring Indigenous peoples and knowledge back to the park.
- **Support for targeted mechanical fuel treatments:** Given the dominance of severe and increasingly frequent wildfires, mechanical fuel treatments (thinning) can be a useful and necessary tool to promote human safety and protection of park infrastructure, including near park inholdings. Mechanical treatments should be limited in maximum extent beyond developed areas, similar to the current plan. Priority should be given to hand treatments wherever possible. Also, treatments should occur without building new/temporary roads, and any logging equipment skid trails should be restored to natural conditions as soon as possible after treatments. We do not support mechanical treatments utilizing motorized ground disturbing equipment (i.e. dozers, skidders, etc.) in Glacier's backcountry (handheld equipment like chainsaws okay).
- **Support fire exclusion for safety/infrastructure:** Effective fire exclusion in and around human infrastructure locations will not only help protect human safety and property, but also will promote and enhance continued public support for current fire management and for park management in general. Consideration should be given to protection of both internal park properties and those on adjacent public, tribal, or private lands.
- **Ponderosa pine stand recruitment/maintenance:** Given the current trend toward fire-regenerated, early successional forest stands in the North Fork, the remaining old growth ponderosa pine stands should be protected from stand replacement fire by periodic application of understory prescribed fires, which would promote continued ponderosa pine longevity and successful seedling regeneration. Such burning also presumably could occur concurrent with prescribed burning in adjacent grassland/shrubland ecosystems.
- **Fire exclusion to promote botanically rare old growth forest:** Given the current trend toward fire-regenerated, early successional forest stands in the McDonald Creek drainage, continued fire exclusion in and near human safety/infrastructure areas might also help promote the continued existence of botanically rare (coastal disjunct) old growth cedar-hemlock stands in the McDonald Creek / Lake watershed. The park should also consider what kind of mechanical treatments might protect these ecosystems in case of future fire.
- **Whitebark Pine restoration:** Restoration and maintenance of the high value keystone species whitebark pine is justified by the fact that unnatural (manmade) ecological issues such as fire suppression, introduced disease, and climate change have exacerbated the NPS mission of preserving and protecting natural ecosystems.
- **Whitebark Pine treatments:** Fire prescriptions that employ (or promote) relatively low severity understory fires would help promote the continued existence of the few remaining old growth legacy trees and regenerate new cohorts. That is, fairly low impact treatments would not only discourage high severity fires that threaten the persistence of old growth but would also help prepare potential seedbeds for stand regeneration.

- **Invasive Plants / Noxious Weeds:** The analysis needs to examine the potential for fire mitigation efforts, including prescribed fire, mechanical treatments, or hand treatments to contribute to the spread of noxious weeds and invasive plant species. Although burning can benefit fire-adapted native species, it can also create establishment sites that preferentially benefit invasive species. The scarification of soils by mechanized equipment amplifies conditions favorable to many invasives. Projects need to assess the likely impacts on weeds and identify the steps the park will take to prevent establishment of weeds or mitigate existing infestations. Monitoring requirements should be included.
- **Smoke management:** Consideration and mitigation of smoke pollution will continue to be important not only in terms of human health issues, but likewise will continue to be an important public relations topic given the typical resistance to wildfire smoke impacts from the public and some politicians.
- **Post-fire rehab:** The plan should continue to ensure that any post-fire rehabilitation efforts are harmonious with the park's overall mission of protecting and restoring natural ecosystems.
- **Suppress unwanted & visitor caused fires:** In addition to supporting the goal of suppressing fires entering the park from adjacent lands, continued suppression of, and education about, all visitor-caused fires should remain an important feature of the plan. (As an aside, continued public outreach efforts and associated park interpretative programs addressing natural fire regimes, fire prevention efforts, and fire-safe behavior likewise should continue to foster public support for park fire management activities).
- **Collaboration:** Continued collaboration with adjacent landowners, agencies, park inholders, and the BNSF railway company should continue to be an important goal, particularly in view of the current trend toward more-frequent wildfires and prescribed fire use. Such collaboration includes not only working with landowners in terms of fuels management hazard reduction, but also will promote improved public education and public relations.
- **Stay Informed:** Fire managers should strive to remain informed about and consult the latest scientific findings on such topics as fire ecology research and the latest technological advances with respect to wild- and prescribed fire.
- **Science collaboration:** Glacier fire managers should continue to monitor not only ongoing fires, but also post-fire responses such as vegetational and erosional processes that can assist the knowledge base for future fire management. Park management should also encourage future post-fire monitoring by collaborating with researchers at universities and other entities.
- **Adaptive Management:** Given the unpredictability of potential impacts from regional-to-global climate change, fire management planning will need to remain flexible and responsive in terms of ecological and societal concerns. For example, if fires become even more frequent than at present, park managers will need to be prepared to alter planning efforts in terms of fire responses, associated budgets, training, and public relations, and other factors.
- **Continue public education/foster support:** Continued public relations efforts will continue to be important for supporting the fire management program, especially given

the health and safety concerns and resultant emotionality surrounding wildfire and prescribe fire. Frequent use of local-to-national media (both print and digital formats) and park interpretative programs can be especially useful in this regard. Opportunities for regular public engagement to learn or inform specific fire mitigation projects, prescribed fires, or the fire management program as a whole should be considered.

- **Impacts to wildlife**

Naturally ignited and prescribed wildfire can positively benefit wildlife who utilize early seral stage forests and grasslands or by creating more heterogenous habitat. However, fire, even low to mixed severity, can also harm certain wildlife species like Canada lynx who select for dense forest cover. Decisions to allow natural fire to burn or to set prescribed fire should strongly assess potential impacts, positive or negative, to wildlife, especially species of conservation concern or federally-listed threatened or endangered species.

- **Good-Neighbor Authority:** With the recent extension of Good Neighbor Authority (GNA) to National Park units and National Wildlife Refuges, it is imperative that the park have a solid, science-based fire management plan in place, to guide any potential use of the GNA within the park.

All of these identified issues are in addition to the issues that the park has identified in its scoping brochure. We look forward to continuing to engage on this important issue and supporting the park through this process.

Sincerely,

Sarah Lundstrum
Glacier Senior Program Manager
National Parks Conservation Association

Peter Metcalf
Executive Director
Glacier Two-Medicine Alliance