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Ben Burr, Executive Director

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Helena-Lewis and Clark National Forest
2880 Skyway Drive
Helena, MT 59601
United States Forest Service

BlueRibbon Coalition (BRC) is writing to provide feedback for the Helena-Lewis and Clark National Forest-wide Prescribed Fire Project. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the United States Forest Service. Many of our members and supporters live in Montana or travel across the country to visit Montana and use motorized vehicles to access Forest Service managed lands throughout Montana. BRC members visit this land for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Many of our members hold organized events that include organized rides in this area. A significant portion of the education mission of organizations like ours and the fundraising that supports organizations like ours comes from these organized events, and we see the continuation of these events as an integral expression of protected rights including freedom of speech and freedom of assembly. Continuation cannot occur if the forest is experiencing wildfire due to mismanagement.

Project Specific Comments

BRC supports the broad objectives to keep forests healthy and reduce the risk of wildland fires. We support treatment on the full 2,305,040 proposed acres. In fact, USFS should consider treatment on the entire forest. 2.9 million acres is a large area and needs to be treated as efficiently as possible. We recommend using commercial treatment in the maximum amount of land possible rather than heavily relying on prescribed burns. Best available science should be used in making these decisions. Past forest fires have burned rampant because of the lack of forest projects. The history of these fires should be looked at when making decisions. These wildfires cause temporary and often permanent closures and irreparable damage to wildlife. It is the USFS obligation to pursue these treatments to prevent these fires to protect public lands.

BRC's concern with prescribed burn, is if a wildfire arises at any point, that wildfire should be treated as such and the USFS should not allow the wildfire to burn in order to meet prescribed burn objectives. This involves a lot of risks and wildfires should always be treated with as much urgency to suppress the fire as possible.

The plan recognizes that roads are a natural fire control line. We recommend looking at all possibilities to create any new roads that would be beneficial to the public for access as well as fire mitigation. The plans adequately manage the public land, allowing for continued access while treating the area. These areas will not have road closures and therefore travel management was not analyzed in detail the plan states.

BRC supports the forest in utilizing utilizing Section 40806 in the Bipartisan Infrastructure Law. Fuelbreaks should be created along existing roads and USFS should analyze using these fuelbreaks as OHV trails or singletrack trails in order to better accommodate the growing number of users and interests on public lands.

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their

activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

A handwritten signature in black ink, appearing to be 'B Burr', followed by a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition
brben@sharetrails.org

A handwritten signature in black ink, appearing to be 'Simone Griffin'.

Simone Griffin
Policy Director
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