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Ben Burr, Executive Director
BlueRibbon Coalition
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March 26, 2024

Kathy Bushnell, Helena District Ranger
2880 Skyway Dr.
Helena, Montana 59602

Dear Ms. Bushnell,

BlueRibbon Coalition (BRC) is writing to provide feedback for the Larabee Hat Vegetation 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 U.S. 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 USFS managed lands throughout Montana. BRC members visit the Clear Fork project area for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, water sports, and other similar pursuits. We would like to add our support to any comment submitted by any other individuals or organizations that advocate for motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Wildfire

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. BRC supports the broad objectives of the proposed action and encourages the USFS to move forward in treating the entire 17,849 proposed acres in the proposed action. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier. For this reason BRC strongly supports the reconstruction of 41.3 miles of roads and would also like to see USFS analyze adding the temporary road mileage of 12.8 miles of routes into the road system, especially the 8.8 miles that are already an existing template.

The plan states a possible method to use is prescribed burns. If this method is chosen for an area, and a wildfire arises at any point, that wildfire should be treated as such and the Forest Service 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.

Timber Harvest

Timber harvest and any sales from forest treatments will also help stimulate the local economy. We believe the USFS should move forward with timber harvest on the full project area. The proposed project provides local jobs and brings in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit. Wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife.

Roads and Trails

The USFS should strongly consider keeping as much area as possible open to recreational users so they are not concentrated in smaller areas to mitigate impacts that come from concentrated use. This land should benefit as many users as possible.

BRC does not support the restoration of routes as all routes have been created for a significant reason and serve a purpose and need including the temporary routes, there is clearly a need for these. If there is a possibility that the route could cause harm to resources the route should be

re-routed or the USFS should find adequate ways to manage the impact rather than closure. Land agencies are required to manage the land through proactive management and education and not hardwire closure as the correct first response to mitigate impact.

Dispersed Camping

BRC appreciates the attention to dispersed camping areas through the proposed action. The USFS should not remove any campsites or fire rings and only improve the existing campsites. Camping popularity has grown tremendously over the past few years and the forest should be accommodating the growing numbers of users rather than limiting campsites.

Conclusion

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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brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, appearing to read 'B Burr', with a long horizontal flourish extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin', with a stylized, cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition