



BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
208.237.1008
brc@sharetrails.org

Ben Burr, Executive Director

BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

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Robert Davies, District Ranger
10 Hungry Horse Dr,
Hungry Horse, MT 59919

Christopher Dowling, District Ranger
200 Ranger Station Road
Bigfork, Montana 59911

BlueRibbon Coalition (BRC) is writing to provide scoping feedback for the East Valley Fuels 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, snowmobiles, and hiking to enjoy federally managed lands throughout Montana, 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 USFS managed lands throughout Montana. BRC members visit these areas 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.

Wildfire

BRC wants to share our support for the broad project objectives to keep forests healthy and reduce the risk of wildland fires. Fuel breaks need to be utilized in the maximum capacity. Best available science should be used in making these decisions. Past forest fires that have burned rampant because of the lack of forest projects should be looked at when making decisions.

Roads and Trails

BRC commends the USFS in their efforts to have a sustainable and healthy forest for all to use. We strongly encourage the USFS to fully analyze and consider adapting all temporary or unauthorized roads into the road system. These roads will offer long term benefits to the forest. Roads act as a natural fire barrier and provide needed access to implement projects and for emergency response teams. Fuel breaks next to roads should also be analyzed as open as a singletrack or ATV only route that provides a unique recreation experience aside from the actual road. BRC is encouraged by the proposed maintenance of 24.2 miles of roads.

Economic Benefits

Roads are crucial for various reasons, not only do they act as a natural wildfire barrier to help protect the forests and protect wildlife and habitat but are also needed for fire treatments and emergency response teams. The Bureau of Economic Analysis showed that in 2021 outdoor recreation brought in over \$1 trillion. Outdoor recreation has only grown in popularity since then. BRC is pleased the USFS is not stifling potential economic benefits through road closures.

Not only will the proposed projects benefit the economy by providing a conducive environment for outdoor recreation but will also bring in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit.

Executive Orders

The Executive Order on Immediate Expansion of American Timber Production (March 1, 2025) directs federal agencies, including the USFS, to prioritize active forest management and increase domestic timber production to support economic growth, wildfire mitigation, and national supply chain resilience. This executive order explicitly mandates that federal land management plans incorporate strategies to streamline timber harvests, reduce regulatory barriers, and maximize sustainable yield on public lands. This should include treatments in designated roadless areas and wilderness study areas.

Explore Act

The USFS must comply with the EXPLORE Act's mandate to expand and enhance outdoor recreation opportunities, including motorized use, rather than restricting access through road and area closures. The Act emphasizes increasing recreational access across federally managed lands, streamlining permitting processes, and improving infrastructure to support diverse recreational uses, including off-highway vehicle (OHV) recreation. Any effort by the USFS to close existing motorized routes or restrict access contradicts the spirit of the EXPLORE Act, which directs federal agencies to facilitate and expand motorized recreation opportunities. Instead, the U.S. Forest Service should focus on maintaining and designating sustainable routes that align with the Act's goals, ensuring public lands remain open and accessible for multiple-use recreation.

Vegetation Treatments

The USFS needs to be using past wildfires that have been caused because of lack of treatments due to designations and restrictive management when making these decisions and use best available science. By proactively managing these challenges, the USFS can maintain the health and resilience of these landscapes, ensuring they continue to serve as vital ecological and recreational resources for current and future generations including its multiple use and sustainable yield mission.

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 U.S. 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 and other natural disasters. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. 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.

BRC's concern with prescribed burn, is if a wildfire arises at any point, that wildfire should be treated as such and the BLM 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.

Roadless Areas

There is no absolute statutory prohibition against treatments in roadless areas. The 2001 Roadless Area Conservation Rule (Roadless Rule) limits road construction and timber harvesting in designated roadless areas but allows for exceptions, including treatments necessary to address threats like wildfire, insect infestations and disease. BRC believes this

project should be one of these exceptions. The rule outlines that exceptions exist for actions needed to prevent or mitigate the risk of wildfire, insect infestation, or disease if these threats pose an imminent risk to human life, property, or the ecosystem. The USFS needs to also abide by The Healthy Forests Restoration Act of 2003 (HFRA) (16 U.S.C. §§ 6501–6591) which encourages active forest management to address pest infestations and wildfire risks, including in roadless areas. Expedited environmental review is allowed for projects that reduce hazardous fuels and insect infestations in high-risk areas. This project is a perfect candidate for these exceptions.

In short, while roadless areas have restrictions on road-building and large-scale mechanical treatments, there are statutory and regulatory exceptions that allow pest treatments if they are essential for forest health, or preventing broader ecological damage which the EA outlines explicitly. This proposal is necessary to prevent long-term environmental degradation or threats to adjacent lands. BRC supports the proposed treatments in IRA's.

Public Health and Safety

The removal of hazard trees is a matter of public health and safety. Not only can hazard trees prevent access for the general public but it can cause harm, prevent access for emergency response teams and act as fuels for wildfire. “It is well documented that exposure to wildfire smoke is associated with adverse respiratory, cardiovascular, and birth outcomes, and premature mortality.”¹ Over the last three decades, the acreage burned annually by wildfire across the United States has doubled. This trend is driven by western states such as California, which experienced a fivefold increase in annual acreage burned from wildfire over the last half-century (Williams et al., 2019).

“In the United States, the overall population experiencing wildfire smoke will continue to increase due to projected increases in wildfires. Considering climate change projections through 2050, it is estimated that more than 82 million people in the United States will be subject to a 57% and 31% increase in the frequency and intensity of smoke waves, respectively (Liu et al., 2016a).”

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:

Ben Burr
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in dark ink, consisting of stylized initials 'BB' followed by a long horizontal flourish.

Ben Burr
Executive Director
BlueRibbon Coalition

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

Simone Griffin
Policy Director
BlueRibbon Coalition