



September 3, 2025

Region One Objection Reviewing Officer
U.S. Forest Service, Northern Regional Office
26 Fort Missoula Road
Missoula, MT
59804

Re: Helena-Lewis & Clark Forestwide Prescribed Fire Project #63783 Objection

Submitted electronically via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=63783>

Pursuant to 36 C.F.R. 219 Subpart B, Wild Montana submits this objection to portions of the final Environmental Assessment and draft Decision Notice for the Helena-Lewis & Clark Forestwide Prescribed Fire Project.

I. Description of Objecting Party and Standing

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our thousands of members and tens of thousands of supporters are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana's wild places.

Our members enjoy recreating on the Helena-Lewis & Clark National Forest and benefit from the ecological values the forest provides. We submitted comments on the draft Environmental Assessment (EA) for this project on March 11, 2024.

Lead Objector

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II. Overview

Overall, we are supportive of this project and appreciate the Forest's focus on having more fire on the landscape through a forest-wide plan. This project is soundly grounded in the on-the-ground need for ecological restoration and addressing the risk of severe fire. We appreciate the changes made to the project in response to our comments on the draft EA. However, we believe there are a few issues that could be improved upon before finalizing the decision notice to ensure that this project best meets the Purpose and Need, is implemented as intended, and can serve as a template for similar projects across other forests in Montana.

III. Objections

Wild Montana raises the following objections to the Environmental Assessment and draft Decision Notice for the Helena-Lewis & Clark Forestwide Prescribed Fire Project.

Objection 01: *Wild Montana objects to the possibility that this decision could be used to authorize projects not in line with the intended purpose of the EA.*

We are concerned that this authorization, as written, is broad enough to allow future forest managers to move away from the intended focus on prescribed fire and allow more mechanical treatment to accomplish project goals. On pages 2-3 of our draft EA comments ("Scope of Treatments") we recommended that the final EA set a limit on acres of each treatment type per year to provide accountability and set sidebars for how this authorization could be used by Forest managers with different forest health approaches over the lifespan of the project. While we appreciate that the Forest Service has worked to address this concern in the EA, such as expanding Table 3 to include percentages of each type of treatment for each geographic area, we would like to see stronger language in the final EA explaining that prescribed burning is the primary purpose of this project.

We believe a small change to the Proposed Action would help to clarify that the primary purpose of this project is to utilize prescribed fire, and that other treatments are to be limited in scope and utilized secondary to fire.

Remedy

- Modify the Proposed Action on page 6 of the EA as follows: *The Helena-Lewis and Clark National Forest proposes to authorize prescribed burning, supplemented with limited amounts of hand and mechanical treatments, of vegetation across the national forest in areas needing restoration or maintenance outside of designated wilderness or research natural areas (see figure 17, an overview map of the project area).*

Objection 02: *Potential loss or changes to Inventoried Roadless Area protections must be accounted for in the EA.*



We discussed impacts to wildlands, including roadless areas, on page 3 of our draft EA comments and expressed concern about the lack of detail around design criteria for these types of management areas. We remain concerned about this lack of detail and would like to see project design criteria for designated or administratively protected areas (Wilderness, Wilderness Study Areas, the Badger Two Medicine, and roadless areas). While we did not address roadless areas in detail in our previous comments, the USDA recently announced its intention to rescind the Roadless Area Conservation Rule. This changed circumstance warrants discussion. While the EA considers impacts the roadless lands, it did not foresee that protections for these lands could be lifted over the life of the project. We appreciate that the project is generally in accordance with the Roadless Rule, even outside of roadless areas, given that there is no new road construction proposed and mechanical thinning will be limited to generally small-diameter trees, but believe that greater assurance that the existing roadless character of Inventoried Roadless Areas will be preserved. Mechanical treatments and firelines both present the potential to facilitate unauthorized motorized use and creation of user routes in administratively protected areas. To counter these possibilities, we ask that the final Decision Notice include a design feature prohibiting mechanized treatments in areas closed to motor vehicle use.

Remedies

- Include project design features requiring that all fire control lines, firelines, etc. be “obliterated” or “fully removed,” not merely rehabilitated.
- Include a project design feature that prohibits mechanized treatments in areas closed to motor vehicle use.

IV. Meeting Request

Pursuant to 36 C.F.R. Section 219.57(a), Wild Montana requests to meet with the reviewing officer to discuss and resolve these objections.

V. Conclusion

In addition to our objections, we remain concerned about the Forest Service’s ability to implement this project. We raised several concerns in our draft EA comments regarding the Forest Service’s ability to implement this project as intended (see our draft EA comments page 2, pages 4-5 “Implementation and Monitoring”). As described in our comments, the fieldwork and consultations necessary to implement this project will require a significant amount of work from Forest Service Resource Specialists. Likewise, safe ignition and management of prescribed fire require a significant amount of knowledge. In addition, there will be work required to rehabilitate fire line and conduct other post-treatment activities. However, since January 2025, the Helena-Lewis & Clark, along with every other forest in the nation, has seen a significant loss of staff. Furthermore, the U.S. Department of Agriculture recently announced its intention to shutter the Northern Region office. Given these additional capacity constraints, we are even more



concerned about the forest's ability to implement this project as intended than we were in March 2024.

The implementation process described in Appendix C requires the work of many different resource specialists (which is appropriate). Prior to finalizing the decision, we would like to see the Forest Service carefully consider how it will implement this project if capacity remains as-is for the foreseeable future. We suggest that the forest consider reducing the initial scope and scale of the project (fewer acres and shorter timeframe), and breaking it into "phases" thus preserving the ability to scale up future work based on future capacity while making feasible commitments at this time.

Thank you for your time and consideration. We look forward to discussing these issues further and hope that our concerns can be resolved through an objection resolution meeting. We look forward to continuing to work with the Helena-Lewis & Clark National Forest as this decision is finalized and throughout project implementation. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen", with a long horizontal line extending to the right.

Hilary Eisen
Federal Policy Director
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