



**GLACIER-
TWO MEDICINE**
ALLIANCE

September 4, 2025

To: Region One, Objection Review 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>

Dear Reviewing Officer and Emily Platt, Responsible Official,

Pursuant to 36 C.F.R. 219 Subpart B, Glacier-Two Medicine Alliance submits this objection to portions of the final Environmental Assessment, Finding of No Significant Impact and draft Decision Notice for the Helena-Lewis & Clark Forestwide Prescribed Fire Project dated July 2025. Project files are available [here](#) on the Forest Service website.

I. Description of Objecting Party and Standing

Glacier-Two Medicine Alliance is a grassroots conservation organization based on the Blackfeet Nation in East Glacier Park. We are dedicated to the protection, stewardship, and shared enjoyment of the Badger-Two Medicine and surrounding areas in the Crown of the Continent Ecosystem. Since our founding in 1984, our members have worked diligently to defend the outstanding ecological and cultural values of this wild and tribally significant portion of today's Helena-Lewis and Clark National Forest from irresponsible industrial development or mismanagement. Glacier-Two Medicine Alliance has a long history of involvement in other forest planning and management activities on the Helena-Lewis and Clark National Forest as well, including the revised Forest Plan. Many of our nearly two thousand members and supporters routinely hunt, fish, hike, recreate or otherwise benefit from the national forest.

Glacier-Two Medicine Alliance fully participated in the planning process for the Forestwide Prescribed Fire Project. We submitted written comments during Scoping on May 1, 2023. We submitted written comments jointly with The Wilderness Society on the draft Environmental Assessment on March 11, 2024. We also attended a virtual public meeting on Feb. 20, 2024.

Pursuant to 36 CFR 218.8(d), the lead objector for GTMA, along with contact information, is as follows:

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II. Remarks

Glacier-Two Medicine Alliance is supportive of the Helena-Lewis and Clark National Forest's Prescribed Fire Project. Accelerating and expanding the use of prescribed fire to restore more historically analogous low and mixed-severity fire regimes to certain forest types is crucial to improving overall forest health as well as bolstering forest resilience to climate change. It will also, we expect, allow managers to embrace natural fire as an ecological process rather than as a political crisis to be managed. On the whole this program is a well-thought out and scientifically defensible approach to ecological restoration and addressing the risk of uncharacteristically severe wildfires in the face of climate change. We appreciate the effort the Forest Service has made to respond to, and thoughtfully incorporate, public input at various stages of the project. We particularly appreciate changes made since the draft EA, including but not limited to, the commitment to continued public engagement and greater project transparency, including 5 year reviews; substantive improvements to design features to better safeguard fish and wildlife habitat for sensitive species; clarification of design features and likely project sites; adding an allowance for some commercial sale of small diameter (<10" dbh) timber while clearly decoupling the project from traditional timber sales; and for its substantial effort to engage Tribal Nations such as the Blackfeet. In short, this is a good program. However, we believe a few issues still need to be addressed that will ensure the program best meets the Purpose and Need, is implemented as intended even as forest leadership changes over time, and to serve as an effective model for similar programs on other forests across the region.

III. Objections

Glacier-Two Medicine Alliance raises the following objections to the Environmental Assessment and draft Decision Notice for the Forestwide Prescribed Fire Project.

Objection 01 – *The scope of the authorization (e.g. number of years, allowable acreage) still needs further clarification.*

The EA remains unclear about how long this authorization will last or the total number of acres that may be treated annually under it. Nowhere in the EA or FONSI could we locate any mention of the length of authorization, let alone a clear indication that this authorization will end when this date is reached. The closest indicator of any timeline we could find was in The

Implementation Plan and Checklist, which states: “The intent is that this implementation plan will be used over a 20-year timeframe” (EA, p. 114).

As we stated on pages 2 – 3 of our draft EA comments, the lack of a firm time frame is unacceptable. An indefinite timeline renders any analysis of potential direct, indirect, or cumulative effects required by the National Environmental Policy Act meaningless. Already a 20-year timeline is difficult enough to analyze with any confidence given the rate and scale of ecological and social change occurring on this landscape. Creating an indefinite authorization is not only likely unlawful, but undermines public trust in the project and creates conditions where future forest leadership with different motivations could abuse the authorization. The potential for such re-direction is facilitated by including the option for projects to only utilize mechanical or hand treatments should the decision maker decide a prescribed fire is not appropriate.

Similarly, the EA is too vague on the total acres that could be annually affected. On p. 6, the EA states that “the maximum number of acres that would be *burned* annually is anticipated to be no greater than 40,000 acres across the project area” (emphasis added) whereas Table 3 on p. 10 provides “the estimated maximum acreage that would be *managed* annually in each area,” with a total of 42,000 acres. These numbers should be clarified to provide the public greater certainty and understanding of the scope of the project, including how many acres could be managed without any prescribed fire (we suggest this number is zero; see our objection below).

Proposed Remedy: Explicitly clarify in the Proposed Action the length of authorization (we suggest an absolute maximum of 20 years, though we prefer 10, per p. 3 of our draft EA comments) as well as the maximum total acreage that can be treated by each respective method annually under this authorization. Suggested language for the Proposed Action could be: “*The Helena-Lewis and Clark National Forest proposes to authorize a 20-year program of prescribed burning across the national forest in areas needing restoration or maintenance outside of designated Wilderness or research natural areas, in order to restore ecological conditions and reduce the risk of uncharacteristically severe wildfires to the forest and communities. All site-specific projects implemented under this program will include a prescribed burn, which may be supplemented with limited amounts of hand and / or mechanical treatment of vegetations.*”

Objection 02 – *To safeguard against this program being used to authorize projects not in line with the intended purpose, any projects conducted pursuant to the Prescribed Fire Project authorization should require a prescribed fire component, and no new projects should be authorized if a backlog of pretreatment projects that have yet to be burned occurs.*

We fully support this program’s intent to restore ecologically beneficial, historically analogous fire regimes to the landscape through the use of prescribed fire, with a desired outcome the

restoration of forest conditions that enable fire managers to manage naturally ignited fires for ecological benefits. To do so, the Forest Service proposes to expand the use of prescribed fire along with mechanical and hand treatments to prepare sites prior to burning. However, contrary to the name of the program -- “the Prescribed Fire Project”—prescribed fire isn’t actually required to be included in projects implemented under this authorization. While the project is clear that the primary purpose is to return fire to the landscape, it provides a huge caveat that allows managers to conduct treatments without including a prescribed fire component: “Fuels treatments without the addition of prescribed fire would be limited to areas where resource concerns dictate the need to reduce fuel loading but risk to resource values from prescribed fire are too high” (EA, p. 8). What constitutes too high a risk to a resource value (or to which values) is never quantified or qualitatively described; this is simply left to the judgement of the deciding officer. This is way too much discretion, which could be abused as noted in Objection 01. Table 3 estimates that as much as 70% of the project acres in the Divide and Elkhorn geographic areas may be treated without a prescribed fire component. As we wrote on p. 6 – 7 of our draft EA comments, sites that are not conducive to a prescribed fire should not be otherwise treated as part of a prescribed fire program. Such projects should be implemented under a different authorization.

We are concerned that this authorization remains broad enough that future forest managers could move away from the intended focus on prescribed fire and lean instead predominantly on mechanical treatment to simply “reduce fuels.” To further safeguard against this very foreseeable possibility, the Forest Service should not only require prescribed fire included in all projects, it should also add a monitoring component to its five-year reviews to track its actual use. This monitoring component would track the total acreage burned as a percentage of the total acres prepped (i.e. mechanically or hand treated) to date. If the ratio falls below 80%, the Forest Service will delay initiation of new projects until sufficient amount of the prepped acreage have been burnt.

Preferred Remedy: Clarify that all projects implemented under this authorization must include prescribed fire as the primary method of treatment. Add a commitment that new projects will not be implemented if monitoring indicates that burned acreage falls below an 80% threshold.

Alternative Remedy: If the Forest Service insists on including projects that only consist of mechanical and/or hand treatments (e.g. no prescribed fire component), then the EA should clearly state the maximum number of acres that could be thus treated for any one project, as well as the total maximum number of acres that could be thus treated in each geographic area per year as well as the total that could be so treated over the life of this authorization. These safeguards are crucial to keep the Prescribed Fire Program from being transformed into a mechanical treatment program by future forest leadership less committed to the ecological restoration priorities of the current leadership, or more risk adverse to the use of prescribed fire. Also, add a

commitment that new projects will not be implemented if monitoring indicates that burned acreage is below an 80% threshold.

Objection 03 – *Clarification is needed to ensure closed level 1 roads reopened for this project, or mechanized control / firelines do not facilitate unauthorized motorized use.*

As we discussed in pages 7-9 and 12 of our comments on the draft EA, GTMA is quite concerned that the implementation of this project will lead to increased incidents of unauthorized motorized use by the public, with negative effects for wildlife habitat security (especially grizzly bears), water quality and fisheries, wilderness characteristics and other forest values. The most likely scenario results from currently closed roads reopened for this project. The EA states that the Forest Service will return any roads so opened to a hydrologically stable state and block public access. Roads re-opened for administrative access need to be closed in such a way that discourages human use. Gates or other blockades only stop certain types of motorized vehicles. And rehabilitated roads encourage non-motorized human use as well, which erodes wildlife habitat security, especially for elk and grizzly bears.

Mechanical fire control lines or hand dug firelines could be used by dirtbikes or ATVs in some instances to facilitate off-road access. The Forest Service has taken appreciated steps to provide clearer direction on the placement of such lines but some clarification is needed to ensure they do not become user generated routes and trails. First, it is not clear how much fire control line may be constructed. On p. 7, the EA states: “Estimated amount of mechanized control line per geographic area would be less than 20 miles.” It is unclear if this is annually, or over the life of the project. FAH-4 indicates no more than 20 miles *annually*, though this applies only to bull trout occupied subwatersheds, which is a small minority of the project area. Clarification is needed.

Likewise, clarification is needed on what happens to these lines. WTR-6 states that “Fire control lines will be generally in place for 1 to 2 seasons and obliterated afterwards,” whereas “Fireline would be rehabilitated” (EA, p. 96). However, at present, it is not clear that the Forest Service is even committing to rehabilitate firelines. On p. 7 the EA states: “All fireline would be rehabilitated. Fireline would be rehabilitated as needed to prevent erosion or unauthorized use.” These two sentences, which occurred verbatim in the draft EA, are contradictory and confusing.

Part of the confusion may stem from lack of clear definition of terms. Is a mechanized fire control line different from a mechanically constructed fireline or a fireline built with hand tools? Clarification of terms as well as how all such “lines” will be handled post project is needed.

Proposed Remedy: Modify RT-1 to say that “roads closed to the public and used for access will be blocked *and the bed surface obstructed in such a way to prevent illegal motorized use*” (emphasis added). Modify other design features to require that all fire control lines and firelines (or similar terms) be “obliterated” or “fully removed,” not merely rehabilitated.

Objection 04 – *GTMA objects to the use of mechanical treatments in portions of the national forest closed to motorized use.*

As we did on p. 10 and pages 14 – 15 of our draft EA, we continue to ask the Forest Service to preclude the use of mechanical treatment in areas closed to motorized use, such as the Badger-Two Medicine, certain recommended wilderness areas, or many inventoried roadless areas, or other areas based on the Travel Plan or Recreation Opportunity Spectrum in the Forest Plan. The Forest Service did not address our concern related to the Badger-Two Medicine, and only said that activities in recommended wilderness or Wilderness Study Areas will not preclude their future designation as Wilderness, while activities in Inventoried Roadless Areas will be consistent with the Roadless Area Conservation Rule. As we wrote on p. 10 of our draft EA comments: “Only hand treatments and prescribed fire should be allowed in either recommended wilderness or Wilderness Study Areas [closed to motorized use]. Under no circumstances should motorized vehicles like bulldozers, feller bunchers, skidders, etc. be utilized. Such prohibition is consistent with FW-RECWILD-SUIT-01, and the minimum tool ethic of Wilderness Preservation.” Mechanical treatment is not only at odds from a values and resource protection standpoint, it can facilitate illegal motorized use by creating spaces and pathways big enough to allow ATVs, dirt bikes and other motorized vehicles to pass. GTMA is particularly concerned that the use of mechanical treatments in the Badger-Two Medicine is at odds with the unique combination of ecological and cultural values of this area as described in the Forest Plan’s desired conditions and may cause adverse effects to the values, attributes and integrity of the Traditional Cultural District.

Proposed Remedy: Add a design feature RT-17: “No mechanized treatment will occur in Primitive or Semiprimitive Nonmotorized Recreation Opportunity settings, or in areas otherwise closed to motorized recreational use.”

Objection 05 – *GTMA objects to the suggestion that grizzly bears may not be present in certain geographic areas.*

The EA states on p. 19 that “grizzly bears ‘may be present’ throughout most of the project area, except for the Snowies, Crazies, and Castles geographic areas and the portion of the Big Belts geographic area that lies south of U.S. Highway 12.” The document cites the biological assessment for the Helena-Lewis and Clark forest plan. This assessment is outdated as far as the distribution of grizzly bears is concerned, and should not be the basis for determination of where grizzly bears may be present, especially over the life of an approximately 20-year project. Grizzly bear range is expanding quickly, with bears routinely showing up in places they haven’t

been spotted in over a century. Grizzly bears may as of 2024 already be present in the Snowies and Crazies, according to Montana Fish, Wildlife and Parks, with data from US Fish and Wildlife Service.¹ Additional publications by Sells et al. (2023)² and by Bader and Sieracki (September 2024)³ illustrate the on-going range expansion of grizzly bears. The Prescribed Fire project should assume that grizzly bears may be present throughout the project area and apply design features accordingly.

Proposed Remedy: Remove language that suggests grizzly bears may not be present in any geographic area or portion of a geographic areas. Instead, clarify that grizzly bears may be present throughout the project area and that design features should be implemented accordingly.

Objection 06 – *Annual public meetings should be held in-person, not just virtually.*

GTMA applauds the Forest Service for making real commitments to keep the public informed and engaged throughout the life of the project, including by publishing updates on projects in process, planned projects, and 5-year assessments. We appreciate the p Forest will hold a meeting to “enable two-way communication” (EA, p. 12). However, we object to the suggestion that “the meeting will likely be virtual to enable participation from across the landscape” (EA, p. 12). While virtual meetings may sound like an efficient and fair platform to enable participation, in practice they’re not. Many people in rural Montana do not have access to reliable internet to participate, or are not comfortable using online platforms. Even more importantly, online platforms do not provide an opportunity for face-to-face interactions with representatives of the Forest Service that are essential to building trust and understanding. Nor do virtual meetings allow the public to easily share information with the Forest Service that may be helpful in planning and implementation of the proposed project, unless the member of the public is adept at the use of information technology, which many interested persons are not.

Proposed Remedy: The Forest Service commit to host an annual in-person public meeting at the District Ranger office for each geographic area. The option to join the meeting virtually should be provided for folks who are unable to travel. The meeting should be in the evening so working folks can attend. This commitment will boost public trust and support for the project, with positive repercussions for public relations beyond the scope of this project.

¹ See Montana Fish, Wildlife and Parks web page “Grizzly Bear Tracking” <https://fwp.mt.gov/conservation/wildlife-management/wildlife-migration/tracking/furbearer-carnivore/grizzly-bear>, last accessed 9/1/2025. US Fish and Wildlife Service “May Be Present” maps, most recently published in 2023, show grizzly bears on the edge of these island ranges.

² Sells, SN, CM Costello, PM Lukacs, LL Roberts, and MA Vinks. (2023). Predicted pathways between grizzly bear ecosystems in Western Montana. *Biological Conservation*, 284: 110199.

³ Bader, M. and P. Sieracki. (2024). Spatiotemporal Dimensions of Grizzly Bear Recovery. Technical Report 02-24. Missoula, MT. 37p.

IV. Request for a Meeting

Glacier-Two Medicine Alliance requests a meeting with the Reviewing Officer to discuss and resolve these objections pursuant to 36 CFR Section 219.57(a). If other objections are filed on this project, we formally request a resolution meeting with all the objectors present (including GTMA) during the agency's objection review period. We believe a collective meeting would be a beneficial way to resolve any objections that arise in order to improve this project.

V. Conclusion

Thank you again for the good work the Forest Service has put into this project to date, and its responsiveness to prior rounds of public comment. As outlined above, Glacier-Two Medicine Alliance has remaining substantive concerns with the final EA, FONSI, and draft DN related to matters that we previously raised in our comments. We look forward to the opportunity to discuss these issues further with the expectation that they may be adequately resolved. GTMA looks forward to continuing to work with the Helena-Lewis and Clark National Forest during the objection period as well as throughout the implementation phase of this project, including as potential collaborators in pre and post project monitoring as described on p. 12 of the final EA and Decision Notice. Please do not hesitate to contact me with any questions or for clarification regarding our comments and objection.

Sincerely,



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