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Sioux Ranger District
101 SE First Street
Camp Crook, SD 57724

BlueRibbon Coalition (BRC) is writing to provide feedback for the Chalk Buttes Environmental Assessment. 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 Oregon or travel across the country to visit Oregon and use motorized vehicles to access BLM managed lands throughout Oregon. BRC members visit the Chalk Buttes management area for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, 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.

Project Alternatives

While BRC supports the proposed alternative for vegetation treatments we encourage the USFS to develop an alternative that maximizes access and transportation. While temporary roads are needed for the completion of the project proposal, these roads should at least be analyzed to be permanently added into the road system. These roads can continue to provide access for future treatments, emergency response and access in general. NEPA requires the agency to analyze a broad range of alternatives. In order to comply, USFS should have an alternative that analyzes maximizing access in order to compare against the no action alternative.

Roads and Trails

BRC supports road construction and maintenance on the maximum amount of mileage. These routes provide necessary and unique recreational purposes and needs such as fire breaks and emergency response access not to mention the economic benefits they will provide. This land should benefit as many users as possible.

Executive Orders

The Executive Order on Immediate Expansion of American Timber Production (March 1, 2025) directs federal agencies, including the BLM, 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. There have also been EO's rolling back the previous EO's to consider greenhouse gas emissions. This EA refers heavily to greenhouse gas emissions which are not in alignment with the current administration's priorities and should not be relied on.

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. This proposal is a great way to comply with the Explore Act. The Forest Service should focus on maintaining and designating sustainable routes that align with the Act's goals, ensuring public lands remain open

and accessible and safe for multiple-use recreation.

Vegetation Treatments

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. We support treatment on the full 4,354 acres in the project area. One wildfire could cause an entire species to go extinct. We support the USFS in properly managing the lands to reduce conifer encroachment to prevent wildfires that could cause harm to wildlife. BRC recommends using commercial treatments in the maximum amount of acreage. We support timber harvest and commercial thinning on the maximum amount of land possible. 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 public lands to prevent wildfires. In order to adequately manage the roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

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.

Recent peer-reviewed research strongly supports the use of active vegetation management to reduce wildfire severity and improve long-term forest resilience. A comprehensive meta-analysis of conifer forests across the western United States found that treatments combining mechanical thinning with prescribed fire reduced subsequent wildfire severity by 62–72% compared to untreated areas, even under severe fire weather conditions. The study further concluded that treatments addressing surface and ladder fuels were consistently more effective than thinning alone, underscoring the importance of integrated fuel reduction strategies in fire-prone landscapes. Researchers also found that treatment effectiveness persisted across multiple forest types, although maintenance and retreatment become increasingly important over time as fuels reaccumulate (Davis et al. 2024). These findings demonstrate that proactive vegetation treatments are scientifically supported tools for reducing the risk of uncharacteristically severe wildfire, protecting wildlife habitat and watersheds, and improving ecosystem resilience in the face of increasing wildfire activity across the West.¹

Timber Harvest

Timber harvest and any sales from forest treatments will also help stimulate the local economy.

¹ <https://www.science.org/doi/10.1126/science.aea6463>

BRC recommends treatment on the maximum amount of acreage. Timber harvest 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.

Public Health and Safety

The USFS should be doing everything in its power to prevent wildfire from arising by approving and moving forward with firescape projects. “It is well documented that exposure to wildfire smoke is associated with adverse respiratory, cardiovascular, and birth outcomes, and premature mortality.”² This plan should move through the analysis phase as quickly as possible, analyzing even more acreage and mileage and then approving and implementing the project.

“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). While wildfires can impact the environment and human health through various pathways (e.g., impaired drinking water, soils, and crops)”³

Addressing hazardous trees along roads and trails is also crucial for the public’s health and safety. This project should analyze and fall all hazardous trees identified along the routes in order to protect public users.

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.

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https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse_wildfire-and-prescribed-fire-brief_final_2022.pdf

³ <https://siepr.stanford.edu/publications/policy-brief/managing-growing-cost-wildfire>

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, consisting of stylized initials 'BB' followed by a long horizontal line.

Ben Burr
Executive Director
BlueRibbon Coalition

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

Simone Griffin
Policy Director
BlueRibbon Coalition