BlueRibbon Coalition
800 W Main St Suite 1460
Boise, ID 83702
208.237.1008
brc@blueribboncoalition.org

Ben Burr, Executive Director
800 W Main St, Suite 1460
Boise, ID 83702

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Jarel Kurtz, Acting District Ranger
Lincoln Ranger District, Helena-Lewis and Clark National Forest
1569 Highway 200
Lincoln, MT 59639

Dear Acting District Ranger Kurtz:

BlueRibbon Coalition (BRC) is writing to provide comments on the Ogden Poorman 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 National Forest System lands throughout the state. BRC members visit these areas 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.

A Categorical Exclusion Is the Appropriate Level of Review

BRC supports the Ogden Poorman Project and agrees that a categorical exclusion under Section 603 of the Healthy Forests Restoration Act (16 U.S.C. 6591b) is the appropriate NEPA pathway. Section 603 limits a project to 3,000 acres, and Ogden Poorman proposes about 2,018 acres of harvest (1,576 acres of regeneration harvest and 442 acres of intermediate harvest), well within that limit. The project is also small relative to the National Forest System lands in Powell and Lewis and Clark Counties, it is confined to lands designated under HFRA Section 602, and it proposes no treatments in wilderness, recommended wilderness, research natural areas, or inventoried roadless areas. No new permanent roads would be built, and the temporary roads would be decommissioned within three years of project completion. A project of this size and footprint does not warrant an environmental assessment or environmental impact statement, and the Forest Service should not add analysis that delays work on a landscape where insect and disease damage is already documented. The scoping document does not identify an extraordinary circumstance that would change that conclusion.

The area was also identified in Secretary of Agriculture Memorandum 1078-006 as an Emergency Action Determination under Section 40807 of the Infrastructure Investment and Jobs Act. Executive Order 13855 (Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk) and Executive Order 14225 (Immediate Expansion of American Timber Production) both direct agencies to use available authorities to increase active management and timber production. A categorical exclusion for a project of this size is consistent with that direction, and we ask the Forest Service to complete the decision on a schedule that allows implementation to begin in 2027.

Timber Harvest and the Local Economy

Timber harvest from this project will help stimulate the local economy. The scoping document correctly identifies the removal of timber as a multiple use that provides jobs and income to local communities, supports small businesses, and helps maintain the regional harvesting and milling infrastructure that the forest needs in order to be managed at all. The project provides local jobs and brings in local revenue, and BRC supports these efforts and supports comments from local residents and members who approve of the project for its local economic benefit. We support harvest on the full 2,018 acres, including the four regeneration units that exceed the 75-acre large opening standard in the 2021 Forest Plan (FW-TIM-STD-08): unit 4 (78 acres), unit 9 (84 acres), unit 33 (97 acres), and unit 36 (76 acres). Larger openings are appropriate where they address homogeneous stands of dead and dying lodgepole pine and dense Douglas-fir, and the Forest Plan provides for them with a 60-day public notice, which this scoping document serves.

Forest Health, Wildfire, and Public Health

Habitat loss is the largest threat to wildlife, and wildfire is the largest threat to habitat. The scoping document describes a mountain pine beetle epidemic that left down fuel loadings exceeding 70 tons per acre in several areas, with western spruce budworm, Douglas-fir beetle, root disease, blister rust, and dwarf mistletoe still active. Those conditions sit in a wildland urban interface identified by the Tri-County Regional Community Wildfire Protection Plan and the Powell County Community Wildfire Protection Plan. Removing the dead and dying material and reducing stand density keeps the forest safe for the communities around Lincoln, for firefighters, and for the people who recreate there. We support the Forest Service in properly managing the forest to prevent wildfires that harm wildlife and watersheds, and we note that many conservation groups actively litigate forest projects that help mitigate fire. The Forest Service should proceed without delay.

The project proposes about 1,896 acres of broadcast, jackpot, and low-intensity underburn after harvest. If a prescribed burn escapes or a wildfire starts in or near a burn unit, it should be treated as a wildfire and suppressed with urgency rather than allowed to burn to meet prescribed burn objectives. The Forest Service should also keep in mind that smoke from wildfire carries serious public health risks, and the short-term smoke from planned, permitted burning is the lesser exposure.

Roads and Trails

Roads are a critical component of forest management. They provide access to carry out projects, give emergency responders and the public a route in and out, and act as a fuel break. The project proposes reconditioning 34 miles of system road, building 5 miles of temporary road, constructing 9 miles of temporary road on existing templates, and using 16 miles of haul route on non-Forest Service land. BRC supports this work because a haul-road reconditioning paid for by a timber sale is often the only realistic opportunity a route gets for drainage, surfacing, and maintenance. Keeping these roads in good condition and open to the public is also good for the local economy, because the visitors who drive, ride, hunt, and camp in this area buy fuel, food, and lodging in Lincoln. We ask the Forest Service to do the following:

- Keep the 34 miles of reconditioned system road open to public motorized use after the project, and limit any temporary closure during haul to the shortest period that safety requires, with advance signing and notice.
- Evaluate the 9 miles of temporary road on existing templates before they are returned to their prior condition. Where an unauthorized road prism or motorized trail already exists and serves recreation or dispersed camping access, the Forest Service should consider whether it can be added to the system rather than rehabilitated.

- Retain the temporary-road commitment in the proposed action: no new permanent roads, and decommissioning within three years. Where a temporary road would provide valuable access, we ask that the alternative of adding it to the system be analyzed rather than assumed away.
- Ensure that treatment work and any resulting road restrictions near the Continental Divide National Scenic Trail do not close existing roads or motorized routes in the area.

Dispersed Camping

BRC believes that all users can and should be accommodated. Camping has grown immensely since 2019, and the number of people who use public land to camp grows every year. The Forest Service should provide as many dispersed camping opportunities as possible so that use is not concentrated in limited sites. Management strategies such as signage, education, and better waste facilities should be exhausted before restrictions or closures of any area or route that provides camping access. We support dispersed camping and believe it provides a valuable user experience that the Forest Service should protect. Dispersed sites, parking areas, and trails disturbed by project activities should be restored to their pre-project condition and remain available to the public.

EXPLORE Act and Multiple Use

Congress directed federal land managers to expand and enhance outdoor recreation opportunities in the EXPLORE Act (Pub. L. 118-234). Public land management actions should not reduce route networks or restrict recreation unless absolutely necessary, and they should work to expand access consistent with that direction. The Ogden Poorman Project is a good opportunity to meet the Act's goals by maintaining the route network alongside active forest management.

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 non-motorized recreation use often overlap as OHVs 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 BlueRibbon Coalition, 800 W Main St, Suite 1460, Boise, ID 83702, or to brc@blueribboncoalition.org.

Sincerely,





Ben Burr
Executive Director
BlueRibbon Coalition

Simone Griffin
Policy Director
BlueRibbon Coalition