

Data Submitted (UTC 11): 3/8/2024 9:40:09 PM

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Comments: I am writing to comment on the Draft EA for the Helena-Lewis and Clark National Forest Forest-wide Prescribed Fire Project # 63783. I support the intent and potential for prescribed fire to reduce fuel loads, enhance wildlife habitat, protect communities and provide a more natural mosaic of vegetation in the environment. However, I strongly feel that this EA does not adequately consider effects of a project this size. Activities planned annually for a project covering nearly 2 ½ million acres over the next 20 years are more appropriately considered in an EIS or with smaller projects. How can you consider cumulative effects now if you don't know what other activities or circumstances might happen 10 or 15 years from now?

I believe the project designs and restrictions need to be described better. The EA states that if grizzly bears, lynx, or wolverines are discovered in or adjacent to a treatment area implementation will cease. I'm somewhat familiar with grizzly bears and the Badger/Two Med area as well as some of the other areas in the Rocky Mountain GA. I doubt there would be any time during spring, summer, or fall that there would not be a grizzly bear within or adjacent to a treatment area. So I'm left to wonder whether this and other restrictions will be followed.

The description of the no-action alternative acknowledges unauthorized motorized use of roads. I believe clearing and maintaining currently overgrown roads and other improvements for project activity will result in increased access and even more unauthorized motorized use. This may result in increased displacement and mortalities for wildlife including T&E species.

Any activity using bulldozers to create fire line or clear roads will result in increased noxious weeds that will spread and reduce habitat for most wildlife species. In my opinion it pretty much outweighs any benefit from prescribed burning. I strongly encourage you to stick to hand lines and restrict heavy equipment in sensitive areas away from human developments.

I do not believe this draft EA can be modified enough to adequately consider the effects of a project this size and time frame. I urge you to consider conducting an EIS. Thanks for the opportunity to comment. I think it would be appropriate if people are also able to comment on activities planned for this project 10 years from now rather than just be informed, as per the current draft EA.