

Data Submitted (UTC 11): 9/24/2021 3:08:51 AM

First name: Simone

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Organization: Blue Ribbon Coalition

Title:

Comments: Dear Mr. Demaagd,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Environmental Assessment of the Prescribed Fire for Restoration and Hazardous Fuels 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 access, including OHV use, equestrian activities, mountain biking, and hiking to enjoy recreation upon state and federally managed lands throughout the United States, including those designated as National Forests. Many of our members and supporters live in and/or recreate in the Sawtooth Forest area and use the aforementioned means to access Forest Service managed lands. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation and the other aforementioned recreational activities, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

BRC is encouraged to read the proposed Environmental Assessment for the Sawtooth National Forest to pre-authorize a wide range of prescribed burns across the Sawtooth National Forest. We support responsible utilization of natural resources on public land, and believe that our national forest leaders should always strive to deliver the greatest good for the greatest number of people. Anyone paying attention to the growth of wildfires in the West can attest that these catastrophic fires aren't serving the greatest good. We need active management in our forests, and responsible prescribed burns are an important active management tool. It is preferable to introduce fire onto the landscape through prescribed burns as opposed to the misguided policy of attempting to manage wildfires in a way to produce similar outcomes. The "unplanned fire in the right place and right time" policy has led to many wildfires growing beyond the control in a way that has threatened communities, ecosystems, and the lives of firefighters.

BRC and its members support Design Elements RSL 1 - RSL 24, which are designed to protect and maintain recreation resources in the Sawtooth National Forest. I note that in Design Element RSL 4 it states "If a trail is widened for fireline purposes it would be rehabbed to pre-burn conditions or if the trail itself was damaged we would mend or recontour it." RSL 22 also states, "Damage to or loss of Forest System trails from prescribed fire activities would be repaired or mitigated." It isn't clear from the Environmental Analysis how it will be communicated to the public when it will become necessary to repair damaged or lost trails. There are many design elements that require the FS to rehabilitate newly constructed firelines. We don't want to see any inadvertent road closures or road rehabilitations result from this action. We recommend adding a process to the Implementation Checklist to notify the public of any trail damage or loss that would require attention under design elements RSL 4 and RSL 22.

It is clear from the Design Elements that the Forest Service recognizes the value of mechanical line treatments and roads and trails for use in controlling wildfire. Given the persistent risk facing Western communities and ecosystems from wildfire - even after successful prescribed burn treatments are accomplished - it would be worth considering if exceptions could be made to Design Elements ALL 2, ALL 3, SBW 2, and RSL 6 to analyze if any mechanical lines could be converted into permanent routes. If these same mechanical lines are effective at

containing prescribed fire, they would also be effective for containing wildfires. They would also likely serve the purpose and need of providing additional recreation experiences. 36 CFR 220.6(e)(1) Authorizes the USFS to construct or reconstruct roads and trails through use of a Categorical Exclusion. USFS should analyze if Categorical Exclusions can be used ahead of any prescribed burn treatment to maintain a portion of newly constructed firelines as new roads and trails.

Also attached is a letter from a BRC member who we want to add our voice to.

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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