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Ben Burr, Executive Director
2026
800 W Main St, Suite 1460
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September 4,

Michael D. Feiger, District Ranger
Cabinet Ranger District, Kootenai National Forest
2693 MT Hwy 200
Trout Creek, MT 59874

Re: Flat Tail Vegetation Management Project (#295448)

Dear District Ranger Feiger:

On behalf of BlueRibbon Coalition (BRC), a national nonprofit trail and public land access advocacy organization representing motorized and mechanized recreation users, including off-highway vehicle (OHV) riders, motorcyclists, and snowmobilers in Montana and across the country, I write in support of the Flat Tail Vegetation Management Project on the Cabinet Ranger District of the Kootenai National Forest. BRC supports proactive forest management that reduces wildfire risk and addresses insect and disease infestation on National Forest System lands. The analysis area — encompassing Larch Point, Set Creek, Larch Creek, and Basin Creek between Big Beaver Creek Road and White Pine Creek Road — is, by the Forest Service's own determination, experiencing or at risk of experiencing exactly these conditions, and we appreciate the Department's use of the emergency authority under Section 40807 of the Infrastructure Investment and Jobs Act to move this work forward without unnecessary delay. Treating roughly 1,451 acres through a combination of commercial harvest, activity-fuels treatments, and non-commercial fuels reduction is a reasonable, proportionate response, and BRC encourages the Forest Service to finalize the Environmental Assessment and issue the Finding of No Significant Impact on the timeline described in your August 21 letter.

Support for the Project's Road Work

BRC is particularly supportive of the transportation-system work built into this project: haul road reconstruction and maintenance on approximately 18 miles of system road, and new construction of

approximately 1.5 miles of road. Well-maintained system roads are the backbone of motorized recreation access on the Cabinet Ranger District, and reconstruction work funded and scheduled alongside a vegetation project is often the only realistic opportunity a route gets for meaningful upkeep. We ask the Forest Service to:

- Retain the reconstructed and newly constructed road segments in the system road network following project implementation, rather than decommissioning them, so the investment continues to serve public access after haul operations conclude;
- Keep affected system roads open to public motorized use to the greatest extent consistent with logging-operation safety, with any temporary restrictions limited in duration and clearly signed and communicated; and
- Where practical, use this reconstruction work as an opportunity to improve drainage, surfacing, and long-term maintainability on routes that also serve dispersed recreation access in the Larch Creek and Basin Creek drainages.

We remind the agency that multiple Executive Orders issued during the Trump Administration emphasized the importance of expanding recreational opportunities, including motorized use, on our nation's public lands. Executive Order 13777 directed agencies to reduce unnecessary regulatory burdens that restrict access and economic opportunity. Executive Order 13821 (*Streamlining and Expediting Requests to Locate Broadband Facilities in Rural America*) recognized the need for improved infrastructure access on federal lands, which includes roads and trails that recreation users rely on. Most notably, Secretarial Order 3366 (*Increasing Recreational Opportunities on Lands and Waters Managed by the U.S. Department of the Interior*) directed agencies to prioritize and expand public access for outdoor recreation, including motorized use where appropriate. In addition, Executive Order 13957 (*Making America Beautiful Again*) specifically promoted active public lands stewardship and expanding access for the American people to enjoy outdoor spaces. These policies remain relevant today and should guide the agency to maintain, protect, and expand roads, routes, and motorized corridors that serve recreation users, rural communities, and the national interest in access to our public lands.

Federal policy directives consistently recognize the importance of recreational access on public lands, particularly motorized use as part of a balanced multiple-use mandate. Executive Order 13855, *Promoting Active Management of America's Forests*, and Executive Order 13975, *Expanding Outdoor Recreation Access*, both emphasize the need to enhance public access and improve recreational infrastructure. The "Making America Beautiful Again" initiative (Executive Order 13957) also encourages expanded use of public lands for recreation, including through infrastructure improvements

and better management access. Secretarial Order 3366, *Increasing Recreational Opportunities on Lands and Waters Managed by the U.S. Department of the Interior*, further directs agencies to prioritize access and reduce barriers to outdoor recreation, including motorized uses. These directives support the position that public land management actions should not reduce route networks or restrict recreation unless absolutely necessary, and should instead work to expand access in alignment with these national policy goals.

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. 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 forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

Wildfire is also the greatest threat to the species potential redundancy. FWS says, *“Redundancy is poor in the South Sierra and Central Coast clades. Both the South Sierra and Central Coast clades have substantially reduced resiliency because of poor occupancy, poor connectivity, relatively high risk of decline, and substantial threats.”* If occupancy and connectivity are poor it is due to the rampant wildfires that have devastated wildlife and habitat. Anthropogenic activities are not the threat to the species but the lack of active forest management is the cause of poor occupancy and connectivity. Sediments from runoff after wildfires and from impaired tributaries and poorly maintained roads can fill lakes and streambeds This leads to obstructed natural stream flows which adversely affect navigation, recreational use, and valuable aquatic habitat.

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.

Public Health and Safety

The Forest Service 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.”¹

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

“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)”²

Timber Harvest

Timber harvest and any sales from forest treatments will also help stimulate the local economy. We believe the USFS should move forward with timber harvest on the full 5,800 acres. The proposed project 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. Wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife.

BRC supports multiple-use management of National Forest System lands and appreciates the District's work to balance forest health, wildfire risk reduction, and public access in this project. We would welcome the opportunity to serve as a resource on recreation-access questions as the project moves toward a final decision, and we ask to be added as an interested party for future notices on this project.

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 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.

Sincerely,



Ben Burr
Executive Director
BlueRibbon Coalition



Simone Griffin
Policy Director
BlueRibbon Coalition

² <https://siepr.stanford.edu/publications/policy-brief/managing-growing-cost-wildfire>