



GLACIER-  
TWO MEDICINE  
ALLIANCE



The  
Wilderness  
Society

March 11, 2024

To: Helena-Lewis and Clark National Forest  
c/o Emily Platt, Supervisor  
2880 Skyway Dr.  
Helena, MT 59601

Re: Forestwide Prescribed Fire Project

*Submitted electronically via CARA:*

*<https://cara.fs2c.usda.gov/Public/CommentInput?Project=63783>*

Dear Supervisor Platt,

On behalf of The Wilderness Society and Glacier-Two Medicine Alliance, thank you for the opportunity to comment on the draft Environmental Assessment for the Helena-Lewis and Clark National Forest's proposed "Forest-wide Prescribed Fire Project." Since 1935, The Wilderness Society has led the effort to permanently protect nearly 112 million acres of wilderness in 44 states. We have been at the forefront of nearly every major public lands victory. Glacier-Two Medicine Alliance is a community-based organization located in East Glacier Park whose priority conservation landscape is the Badger-Two Medicine. Both our organizations have a long history of involvement in the protection, management, and stewardship of what is today the Helena-Lewis and Clark National Forest.

The Wilderness Society and Glacier-Two Medicine Alliance strongly support efforts to reduce wildfire risk to communities and to restore healthy, functioning fire-resilient forest ecosystems across National Forest lands. Similarly, we agree that a significant increase in the pace and scale of treatments is needed to restore dry coniferous forests across the West, particularly as the impacts of climate change (drought, heat waves) and past management practices (fire suppression and exclusion) continue to result in significantly larger, more severe fire seasons. The need to return natural, ecologically-beneficial fire to the landscape - particularly in western U.S. dry coniferous forests - has never been more important. Prescribed fire, including necessary site preparation via mechanical and hand treatments, can be an effective way to achieve these goals when done strategically utilizing best available science and management practices. Similarly, restoration of Indigenous burning practices can be another way

to further these goals (as well as other culturally-beneficial outcomes), a practice we support where appropriate and where desired by Tribal Nations.

Despite our shared commitment to the re-establishment of natural, ecological fire and the use of prescribed fire as forest and wildfire we feel the need to share significant concerns about the massive scale of the Forest-wide Prescribed Fire Project currently being proposed by the Helena-Lewis and Clark. We think there are a number of issues that are not adequately addressed or analyzed. A project of this scale and complexity would likely be better served by a full Environmental Impact Statement to fully evaluate the potential direct, indirect, and cumulative effects of the proposed program as well as provide more site-specific information than is presently provided in the draft EA.

With this in mind, we appreciate the opportunity to offer the following suggestions to help improve the analysis, decision, and implementation of this project.

### **1. Request for More Clarity around the Number of Acres to Be Treated and the Length of the Program**

The draft EA is ambiguous about the number of acres that will be treated - both annually, and in total - as well as the length of the authorization. More specifically, the draft EA provides differing estimates about the number of acres to be treated; e.g., page 4 says: “The maximum number of acres that would be *burned* annually is anticipated to be no greater than 20,000 acres across the project area” (emphasis added) while on page 7, Table 3 provides an “estimated upper limit of acreage to be *managed* annually within the geographic area” (emphasis added). The table provides a range of 22,400 – 27,500, for an average of 24,950, or 499,000 over the suggested 20-year life of the project. This suggests the Forest Service only anticipates burning a maximum of 80% of the acres it will treat under its “prescribed fire project,” with at least 20% of the acreage receiving only mechanical or hand treatments. Furthermore, as discussed below, it is not clear if “maintenance” activities count toward either of these acreage limits. (As discussed below, we also disagree with an allowance for prescribed fire-free projects under this authorization).

The plan is likewise unclear about the size of individual potential projects. The 10-year historic average of burn blocks is provided on p. 4, but it is unclear if these are representative of the size of projects likely to occur under this program, especially given that “burn blocks are likely to trend larger in the future if the forest prioritizes more non-wildland urban interface (WUI) areas to meet objectives including changing the severity of fires that burn across the landscape or protecting remaining old forests” (EA, p. 4). Finally, it is unclear what proportion of the treated acreage is anticipated within each Fire Regime. A breakdown of anticipated treatment acreage by Fire Regime and Forest Vegetation Type would provide greater clarity on where projects are likely to occur. Altogether, the lack of specificity makes it very difficult for the public to understand how these projects may take shape on the ground. From fine to coarse scales, we ask for more detail and greater clarity about the number of acres the Forest expects to be treated annually.

We also ask that the EA clarifies how long this authorization will be in place. The only mentions of length of time appear in Appendix C currently (“The intent is that this implementation plan will be used over a 20-year timeframe” p. 95), discussion of the affected environment (see Botany on p. 10, for example), or the attached specialist reports, with 10 – 20 years as an analytical reference. Conversations with project leadership suggest the authorization is intended to last 20 years, which would have the effect of effectively providing a degree of open-ended authorization that is - from our perspective - unacceptably long. We ask that a clear, plain, and binding statement be included in the Record of Decision.

## **2. Request to shorten the Authorization to 10-years, add an automatic 5-year Review**

We believe that the suggested program length of 20-years is too open ended for a program of this scale, especially given the lack of pre-decisional disclosure of site-specific projects, the reliance on the professional judgment of implementing officials to select and design projects, and the limited opportunity for formal public involvement moving forward. A 20-year time frame makes it difficult to accurately predict and analyze direct, indirect, and cumulative effects, a difficulty compounded by the rapid rate of climate-driven ecological change, as well the similarly rapid social and recreational changes affecting the Forest.

To improve the accuracy of the analysis, provide greater certainty to the public that resources will be properly safeguarded, and to ensure the program follows its intent even as staff turnover, we suggest a 10-year time frame. We also suggest adding an automatic 5-year NEPA Supplemental Information Review Report along the lines of what the Salmon-Challis National Forest has included in its “Fuels Reduction and Restoration” project (Salmon-Challis, p. 44). An automatic review would ensure the program is meeting its intent or get it back on track if it is not, allow for incorporation of new information, allow adjustments based on learning or changed landscape conditions, and perhaps most importantly, provide public trust this program truly is restoring fire and the ecological health of the forest, not merely allowing the Forest Service yet another authorization to cut more small-diameter timber. If at the end of the 10-year period the program has substantially achieved its objectives yet scientifically-defensible need to continue the work remains, the Forest Service could re-authorize the program for another 10-year period.

## **3. Provide Site-Specific Information**

The complete lack of any site-specific information, including when, where, and what treatments or combinations of treatments will occur is a major shortfall of this analysis and contrasts with NEPA requirements to disclose information about existing conditions and the possible effects of the proposed action *before* a decision is made. The lack of disclosure is particularly problematic because the Forest Service does not intend to conduct any further site-specific analysis under NEPA for the remainder of the proposed project. As written, it is not possible to evaluate whether the Forest Service is taking the “hard look” required to make a wise, informed decision. Regardless of its possible legal shortcomings, the practical effect is that the lack of site-specific information makes it impossible for the public to provide good detailed feedback or in light of an

inability to understand where projects might occur. While we believe that this is not the intent, the absence of critically important, site-specific project details effectively amounts to a request for the general public to “trust us” in designing and implementing projects almost anywhere on the Forest.

To help resolve this issue, we suggest the agency identify Priority Treatment Areas at a finer scale than what is provided on page 6 (Priority and Estimated Acreage by Geographic Area Groups), provide maps, and identify any known locations outside of Wilderness and Research Natural Areas that will be no-go zones. Additionally, we’d like to ask the Forest Service to provide a first round of draft projects in the final decision document or draft EIS, along with detailed maps: this subset of projects should be representative of the majority of projects most likely to follow. This additional information would improve public understanding significantly regarding where projects are most likely to occur, how projects are likely to be developed, and how the Design Features and Forest Plan Consistency sideboards will be applied. Overall, adding more detailed maps that show vegetation classes, departure from historic conditions, anticipated future conditions and vegetation classes based on climate modeling, and fire regimes would also be highly beneficial to understanding where this program may be implemented.

#### **4. Request to Provide Site-Selection Criteria**

We see an important opportunity for the Forest Service to create and share a decision tree - or other form of clear, detailed guidance - around the selection of project sites; as the current “Conditions and Prioritization of Project activities” list on p. 5 is impossible to reasonably interpret to specific project sites. What, for example, constitutes “areas with undesirably high wildfire risk” (EA, p. 5)? We believe that the general public would benefit from the addition of information to clarify the factors the Forest Service will consider when choosing a site, such as whether roads need to be rehabilitated to reach it, or factors that may make a site off-limits, such as sensitive wildlife habitat. We would also ask that additional details are included at both the coarse scale (such as vegetated types that will be prioritized) and the fine scale (details about how physical locations within those vegetated types will be selected). Ideally, the Forest Service could include heat maps that indicate areas of higher and lower likelihood for projects based on the site-selection criteria listed in the decision tree.

Similarly, Appendix B “contains a list of applicable project design features that were developed to assure project conformation with the Forest Plan and mitigate potential impacts to resources caused by implementing the proposed action”. We think that generating and sharing maps of proposed treatment areas once all of these design feature layers have been incorporated into a final proposed map for this EA would be extremely helpful; and would go a long way toward creating more clarity around the potential impacts of management actions on Threatened /Endangered plants and animals (which is certain to be a major focus of comments on this EA). It’s difficult to understand, for example, what design feature WL-Lynx-6 (“Where lynx stand initiation and early stand initiation habitat is present within treatment units, retain habitat to the

extent practicable within treatment objectives”) means for on-the-ground implementation without maps incorporating this and other features.

We also appreciate the opportunity to suggest that the site- selection decision tree prioritize sites where wildfire poses a severe risk to communities; sites characterized by dry lower-elevation forest types (like Ponderosa Pine, Doug-fir or Limber Pine savanna); sites where a re-entry fire would help create a mosaic forest stand and align with more historic fire return intervals. We suggest the site selection decision tree de-emphasize sites in High Severity Fire Regimes (such as moist lodgepole forest or spruce and subalpine fir) outside of the WUI, de-emphasize areas far in the backcountry, as well as riparian areas, or areas where substantial road rehabilitation is necessary.

### **5. Clarify historical fire regimes, current conditions, desired conditions and design features for different forest vegetation types.**

The draft EA provides a broad brush explanation of how different forest vegetation communities have departed from historical conditions and fire regimes, their current conditions, and the types of projects that might be undertaken to achieve desired conditions. We think that it is important for the Forest Service to provide a more granular look at how it will select and design projects for each type of vegetation community, such as dry forests, sagebrush, aspen, or subalpine forest / whitebark pine to foster informed feedback on the part of the public; and also request maps that depict the distribution of these vegetation communities on the Forest. Appendix C in the Salmon-Challis Fuels Reduction and Restoration decision notice provides a useful template.

### **6. Request to Incorporate the Effects of climate change**

The major objective of this project is the ecological restoration of fire regimes through the use of prescribed fire as a critically important management tool in an era of shifting climate. One of many challenges in implementing this important and needed project is climate change itself, however. As climate change continues to accelerate and regional impacts like shallower snowpacks, earlier spring runoff, drought, heat waves, and extremely low soil moisture continue to create ideal conditions for larger, more severe wildfires across our National Forests, the opportunity to return fire to the land through projects like this one will become increasingly more difficult. For this reason, we believe that this creates both a need and an opportunity to improve the project as currently written by creating a series of scenarios (e.g. axes could be cool to hot and wet to dry) for use in proactively planning the prescribed fire component of each site-specific project in light of current conditions on the ground. E.g., there may be a need to move burn windows up earlier in the year - or later in the fall; or to prioritize prescribed burns adjacent to recent wildfire areas. Fortunately, the Forest Service has a wealth of thought leaders in this area with whom staff could collaborate to exchange best practices and share lessons learned across Forests and on-the-ground conditions (with extensive scientific literature such as [this](#) and [this](#)).

## **7. Explain how this project is anticipated to accommodate and restore natural fire regimes**

One of the objectives of this project is ecological restoration, including restoring greater heterogeneity to forest stands, reversing conifer encroachment, and facilitating conditions where fire can again play a more natural, ecological role. However, it is not clear how the Forest intends to incorporate naturally-occurring fire back into the treated sites, nor how the treated sites will help the Forest Service return naturally-occurring fire to its historic ecological role. Nor is it clear how this program is expected to shift the Forest's approach to managing and suppressing wildland fire. The explanation of maintenance treatments suggest the Forest Service itself will set the fire return interval, not natural conditions. There is simply a dearth of information and discussion about the interaction between these projects and future fire management on the Forest. This needs to be corrected.

## **8. Add a clear requirement that all projects must include a prescribed fire component**

As noted earlier, we believe prescribed fire, when strategically applied to fire-adapted vegetation communities in low and mixed severity fire regimes, and to appropriate sites, can help improve forest heterogeneity, improve ecological health and function, and improve managers ability to allow naturally-ignited wildfire more freedom to play its ecological role. Notably, best available science and direct experience indicate that areas that have been treated with prescribed fire are generally more effective at diminishing the severity and spread of future wildfires than contextually similar stands treated by mechanical thinning alone.

Unfortunately, even though this program is titled "Forest-wide Prescribed Fire Project," it contains no requirement that prescribed fire be included in each site-specific project. Instead, prescribed fire is simply one of the tools managers may choose when implementing a project; and project leadership has indicated that it is quite probable fire will not be included in some of the projects. We view this lack of alignment across the project design as a major issue, and request that all site-specific projects for the HLC "Forest-wide Prescribed Fire Project" require the incorporation of prescribed fire as a restoration tool.

That is, without a requirement to include prescribed fire, this program could quickly become just another way to log small-diameter trees in the name of the euphemism of the day (e.g., fuels treatment, wildfire crisis, forest health, forest restoration, etc.). In fact, it seems quite probable this could be the outcome since mechanical treatment is faster and generally less risky (not going to burn down the town if something goes wrong). There is tremendous pressure from Washington and Helena to increase the pace of "fuels reduction" currently. Whether or not a project includes a prescribed fire component will thus become totally dependent on the professional priorities and risk tolerance of the personnel implementing the project, which we view as an extremely important and worrisome example of the excessive discretion created by this draft authorization.

To resolve this issue and significantly improve the level of transparency and accountability for this project simultaneously, we ask that a requirement that all projects include a prescribed fire component be added. Projects that cannot have a prescribed fire component

should be proposed and conducted under different authorizations, not one titled “Prescribed Fire Project.” We would also request that monitoring components be added to track the percentage of total project acres that have been burned, as well as a trigger that would pause initiation of pre-fire hand or mechanical treatments at new project sites should the Forest Service fall below an 80% total burned acres threshold at the end of any year. We would suggest that new, on-the-ground treatment work not be allowed to resume until sufficient acreage had been burned to bring the total burned under this authorization above the 80% threshold.

### **9. Request for More Clarity about which Management Actions Authorized under “Maintenance”**

The Proposed Action states that “The Helena-Lewis and Clark National Forest proposes to authorize prescribed burning, hand treatments and mechanical treatments of vegetation across the Forest in areas needing restoration or *maintenance* outside of designated wilderness or research natural areas” (EA, p. 4, emphasis added). However, nowhere is the term “maintenance” defined, nor the scope of activities that could take place under “maintenance” disclosed in the EA. At the Open House the H-LC NF hosted on February 20th as well as in subsequent personal communications, Forest leadership explained maintenance meant follow-up work *after* the initial project was completed, perhaps 5, 10 or even 15 years down the road. Project leadership has explained that maintenance treatments would most likely be a subsequent round of prescribed fire, but may require pre-fire preparations such as fuel re-arrangement or mastication using hand tools or mechanical equipment.

We ask that the Forest Service fully disclose what maintenance entails, and fully analyze the effects of repeatedly returning to these sites and keeping roads open to facilitate future maintenance before issuing a final decision. Some of the questions we’d appreciate more clarity on include: i) does maintenance apply only to sites previously treated under this program, or to sites treated under other projects? ii) how will potential maintenance activities influence the length of time a closed road is in a more accessible state to the public? iii) what are the criteria for determining if a site is subject to maintenance, like a second prescribed fire? iv) if an objective is to restore ecological fire, what is the rationale for repeated prescribed fires at the same site within a 20-year period? Again, we are not necessarily opposed to maintenance burns, we are just requesting greater clarity on where, when, and why they will be utilized. We would also appreciate an explanation of how these maintenance treatments will aid, rather than replace, the restoration of natural ecological fire, including natural processes dictating the fire return interval rather than the Forest Service.

### **10. Roads and unauthorized motorized use**

As noted throughout the EA, it is well-established in the scientific literature that roads can cause significant impacts on forest resources, especially wildlife and aquatic environments, as well as act as a vector for noxious weeds. One of our biggest concerns with this program as presented is the inability to accurately assess the likely direct, indirect, and cumulative effects that may occur

from roads. The draft EA states that access could occur on any system road or trail, including presently closed roads, but that no new road construction would take place (EA, p. 4), a prohibition we fully support. However, it is unclear what types or classifications or conditions of closed roads may be re-opened, or what type of maintenance may be necessary for these roads to again transport equipment. The Terrestrial Wildlife Report acknowledges that “currently revegetated roads may be brushed or masticated during implementation” (p. 22). Will this authorization similarly allow for closed roads that have naturally degraded or been partially or fully decommissioned to be cleared, restored, or otherwise re-constructed (36 CFR 212.1)? Will this authorization allow for road re-alignment, and if so, under what conditions? Will it allow for temporary roads? Will this authorization cause the closing or decommissioning of roads that would otherwise likely be closed or de-commissioned in the next 20-years under the No Action Alternative be delayed? More information is needed.

Additionally, a reasonable estimate of the number of closed roads and total miles that may be opened at one time, as well as over the life of the project, is needed. We suggest that this should be broken down by Geographic Area, or finer scale if possible (such as a Bear Management Unit) to provide a reliable picture of the likely footprint of this program and the type of effects that may occur. Similar data should be provided for roads that may be reconstructed or otherwise rehabilitated, with the data broken down by type of reconstruction or rehabilitation likely to occur. We are concerned that this program could impede closing and decommissioning roads, acts that improve the ecological health of the forest (and the Forest Service budget), and toward a posture of maintaining roads in a custodial state for future administrative use, effectively expanding the roaded footprint of the forest.

Another concern is how the spatial arrangement of administratively opened closed roads may concentrate effects on wildlife. All administratively opened roads must be added to the open motorized route densities and assessed for their impacts on grizzly bear habitat security. All road-related direction and requirements in the Conservation Strategy for the NCDE grizzly bear population must be followed. As part of its commitment to recover grizzly bears in the NCDE and GYE ecosystems, the Forest should pay particularly close attention to the cumulative effects road opening and project site selection may have on grizzly bear presence and movement in the connectivity zones, like the Big Belts or Little Belts, not just on core habitat.

For wildlife, the major issue with opening closed roads is the inevitable increase in human use, which degrades habitat security and leads to greater mortality. Of particular concern is unauthorized motorized use, which, as the Forest rightfully acknowledges, is already an issue on closed roads in many parts of the Forest. Rehabilitating roads to serve these project sites will facilitate more unauthorized motorized use (as well as mountain bike, horse and foot traffic) both during the lifetime of the project, and, depending on how the road is re-closed, long afterwards. The Forest needs to better explain how it will prevent unauthorized motorized use during and after the project, as well as how it accounts for impacts from reasonably foreseeable increase in human use of all types of wildlife, and other resources, or values like air, water, solitude.



To help minimize the long-term impacts of roads, as well as further ecological restoration of the forest, we suggest that the Forest Service do more to close administratively-opened roads than simply block access after the completion of a project (Design Feature RT-1, Appendix B, p. 93). Any re-opened roads should be returned to a more ecologically beneficial state than when they were re-opened. Fully decommissioning (36 CFR 212.1; FSM 7703) some of these roads would improve wildlife habitat security and aquatic environments locally as well as help reverse the extensive injuries inflicted by the Forest Service road system on the ecological integrity of the Forest. One way this might work is to add a Resource Checklist for roads that includes documenting the condition of any roads prior to the start of a project, the likely effects on the environment of re-opening any roads. As part of the monitoring criteria, the Forest Service should document any unauthorized motorized use and known wildlife mortality for sensitive species like wolverine or grizzly bear, associated with the re-opened roads. Another step could be added to the Implementation Plan to decommission, or else facilitate the return of, administratively opened roads toward conditions that truly impede unauthorized use and lessen a road's on-going impact to the environment.

In addition to greater clarity on the use of currently closed roads, we ask that the Forest Service clarify how it will minimize unauthorized motorized use. The removal of Kelly humps and other barriers to allow for administrative access will undoubtedly lead to increased public use, including unauthorized use. Increased public access reduces wildlife habitat security, especially for elk and grizzly bears. Any improvements, such as brush clearing, necessary to return a road to a usable condition, will facilitate greater public use long after the road is again closed. The Forest Service must account for this increase in use or better explain how it will minimize increased use, especially by motorized vehicles.

Finally, The Design Features also appear to consider that roads open to administrative use may allow firewood gathering (see WL-NCD Z1 – 1). If public access to gather firewood is indeed to be allowed on any restricted roads as a result of these projects, we ask that this is disclosed ahead of a final decision, including the allowable collection methods, and the potential effects on wildlife analyzed.

## **11. Strengthen Commitments to Minimize Spread of Noxious Weeds**

The EA submits that there is already a substantial noxious weeds problem on over 100,000 acres of the Forest. The preferred action also acknowledges that the ground disturbances required in the action will further add to the current infestations of invasives. It is also true that the no action alternative could lead to more extreme effects wildfires that would also be of a scale to see the expansion of infested acres. Given the deleterious effects of noxious weeds on native plant communities, soil health, and fish and wildlife habitat, plus the tremendous expense required to mitigate weeds after they get established, we ask that the terms under the Noxious Weeds section for implementation be strengthened regarding pre-treatment surveys and post-treatment to include surveys, treatment and monitoring in any budgeting. Finally, we ask the Forest Service to

include other Design Features that minimize the introduction and spread of noxious weeds, such as actions like decontamination of equipment.

## **12. Only hand treatments and prescribed fire should be allowed in recommended Wilderness and Wilderness Study Areas**

Just as with designated Wilderness, this program should not apply to Recommended Wilderness and Wilderness Study Areas. These areas are some of our nation's most outstanding, yet unprotected, wildlands. They provide vital habitat and habitat security for wildlife, as well as recreational solitude for people, along with many other critical ecological and social values. Natural processes like wildfire, floods, disease, and insects are the primary forces affecting the environment. Importantly, these lands are supposed to be largely free of human manipulation so they can pursue their own ends, a condition the Wilderness Act famously terms "untrammelled." Rather than the Forest Service manipulating these areas either through prescribed fire or fire suppression, these areas should be allowed to naturally adapt to the changing climate. Excluding these areas from this program would best preserve their eligibility for inclusion in the National Wilderness Preservation System.

If these areas are not excluded from this program, then a requirement should be added that projects will only be conducted in recommended wilderness or Wilderness Study Areas under extraordinary circumstances, and these circumstances clearly defined. Likewise, only hand treatments and prescribed fire should be allowed in either recommended wilderness or Wilderness Study Areas. Under no circumstances should motorized vehicles like bulldozers, feller bunchers, skidders, etc. be utilized. Such prohibition is consistent with FW-RECWILD-SUIT-01, and the minimum tool ethic of Wilderness Preservation. Limiting activities to hand treatments and prescribed burning will better protect these areas Wilderness values, although no activities would protect these values best of all.

## **13. Request to Clarify Application of Proposed Program to Roadless Areas.**

There is little to no language about treatments within designated Roadless Areas and if the proposed project would or would not be implemented in Roadless Areas - with no reference to the Roadless Rule itself. Unlike with designated Wilderness or Wilderness Study Areas, where activities should not occur or be minimal in nature in the case of WSAs, the project should consider all of the tools possible within the Roadless Designation while carefully considering the benefits of the areas for other resource purposes.

The Roadless Rule itself would allow putting prescribed fire on the ground within the designated areas, and would even allow for some other fuel treatment activities. It is important that the agency recognize that these areas are unique in their prescription but should not be viewed without the context of the surrounding lands. Roadless Areas that exist in the Wildland Urban Interface should be included as Priority Treatment Areas for fuels work as an example.

#### **14. Request to Clarify Relationship to Mature and Old Growth Plan Amendments**

As the United States Forest Service addresses the climate change effects on what is currently referred to as the wildfire crisis, it is simultaneously recognizing the minimal number of true old-growth forest acres that exist in the public domain. Per current directives, the agency is in the process of scoping a possible national Mature and Old Growth Plan Amendment for all National Forests current Management Plans. This effort is not only about minimizing the loss of additional acres of old-growth categorized stands, but also on the existing stands of mature forests that can be recruited for future old-growth.

As part of this EA the Helena Lewis & Clark National Forest should put together an analysis of opportunities to make current old-growth stands more resilient in face of possible catastrophic wildfires to include prescribed fire and even mechanical treatments that could reduce risk of stand replacement fires. This analysis could also be applied to mature stands that represent our best opportunity at future old-growth.

#### **15. Request to Clarify whether commercial timber harvest will be allowed as well as plans for non-burnable timber**

The draft EA is not clear whether commercial timber harvest will be allowed under this program, nor what will be done with timber that cannot be burned. The original scoping notice explicitly states: “This project proposes no commercial timber harvest” (Scoping, p. 4). However, the draft EA makes no statement on the matter. The closest statement is on page 7 during discussion of the Implementation Process. The EA states “1. Determination of necessity of non-commercial activities prior to prescribed burning” (EA, p. 7). This statement cannot be reasonably interpreted in any way as a prohibition on commercial activities.

We request that the Forest Service clarify whether any commercial timber harvest will be allowed and, if so, under what circumstances. While there may be situations where it is preferable that some portion of the small-diameter logs felled be sent to the mill, strong safeguards must be in place to ensure that any commercial component that might be allowed is wholly and completely ancillary and subservient to the goals of this program. Without strong limiting criteria for when commercial treatments may be considered, commercial considerations could co-opt the program, or at least appear to, and cause suboptimal ecological outcomes and loss of trust. Similarly, projects that have too many logs to burn could consider ways to supply adjacent communities with fire wood, such as the Forest Service’s “Wood for Life” program.

Furthermore, if commercial timber harvest is included as an option in this plan, it should not be allowed in areas of the Forest Plan determined to be unsuitable for timber production or timber harvest, like the Badger-Two Medicine or Wilderness Study Areas (FW-WSA-SUIT-01: “Wilderness study areas are not suitable for timber production or timber harvest.”) or outside any narrow exemptions allowed by the Roadless Rule.

## **16. Request for Confirmation that no salvage logging will be allowed**

Similarly, we ask the Forest Service to clarify if salvage logging will be allowed after a prescribed fire. The draft EA makes no mention of salvage logging. We believe salvage logging should not be allowed due to the ecological damage the practice commonly causes (see Leverkus et al. (2021) for a recent review). Salvage logging would undermine the ecological restoration objectives of this project. Therefore, we strongly encourage the Forest Service to include a statement that no salvage logging will be allowed on sites treated or maintained as part of this program. If salvage logging is to be allowed on any of these sites in the future, the Forest Service must disclose and fully analyze the direct, indirect, and cumulative effects either as part of this decision process or in a separate, future NEPA decision document.

## **17. Request that the Forest Minimize the use of dozers to construct firelines**

Stronger and clearer plan direction regarding fire lines is needed. Project planners should be directed to prioritize natural and pre-existing fire lines. This would include natural fuel breaks and barriers, existing fire footprints, topographical features, and pre-existing human-made fire breaks, like trails and roads. Where such features do not exist or are not sufficient, hand lines should be the preferred construction method. Dozer lines should be a method of last resort due to the impacts they have on soils and vegetation, as well as the potential to create “routes” for ATVs and snowmobiles. Mechanically constructed fire lines should be prohibited in areas where noxious weeds are not yet established. In all circumstances, the amount of fireline to be constructed should be the minimum necessary to contain the fire.

We ask that the plan clarify that all fire lines will be rehabilitated to heal soils and prevent unauthorized use. The present wording is not clear: “All fireline would be rehabilitated. Fireline would be rehabilitated as needed to prevent erosion and unauthorized use” (EA, p. 5).

## **18. Wildlife**

Consultation with the USFWS will create opportunities to better understand how best to design and implement site-specific projects to minimize potential impacts to a wide range of terrestrial and aquatic wildlife species, and look forward to more clarity for Threatened and Endangered Species like wolverine and Canada lynx in particular.

For grizzly bears, our most significant concern is the loss of habitat security due to re-opening of roads and the increased presence of people, as well as potential habitat fragmentation from re-opening of roads or the aggradation of project sites in close proximity to one another. One way to improve protections for grizzly bears would be to apply the Design Features for grizzly bears Forest-wide. Protecting grizzly bear den sites in the Big Belts is essential to achieve natural connectivity between the NCDE and GYE grizzly bear populations, for example, connectivity vital to the long-term recovery of grizzly bears in Montana (see WL-NCDE PCA-1, EA p. 92).

In thinking about all wildlife species potentially impacted (either positively or negatively) by site-specific mechanical treatments or the application of prescribed fire, we would appreciate

better understanding how choices around the implementation of projects annually would be designed to sustain ecological connectivity and travel corridors in particular.

### **19. Requirements to Monitor, Report, and Review Needed**

In our view, the complete lack of any requirement to monitor for intended and unintended effects, to document the work completed, or to conduct a periodic review to ensure the program is achieving its intended outcomes is a major gap that we hope the Forest will address. Results from monitoring, along with a compilation of the work planned and completed to date, should be provided to the public at least every two years - particularly for a project that seeks to reimagine and define the general public's relationships with, and support for, prescribed fire as a critically important forest-health management tool. As explained earlier, a comprehensive review of the program should occur every 5 years, with the results of the analysis released to the public for review.

Fortuitously, the Crown of the Continent landscape is a national model for the development and implementation of long-term, integrated monitoring programs that create real-time information feedback loops and transparency on our public lands for major restoration projects. From 2011-2021, the Southwestern Crown was the site of a 1.5 million-acre Collaborative Forest Landscape Restoration Program that created and implemented a highly effective monitoring program with scores of partners and the general public. [The monitoring program focused on socio-economic and ecological components for a project](#) that was also intended to return prescribed fire to three National Forests within the project. [Monitoring of rare/Threatened/ Endangered forest carnivores](#) to begin to understand the benefits and impacts of restoration projects over the long term was also a major focus. We would strongly suggest the addition of a strategically designed monitoring program for this project as well.

### **20. Strengthen Commitment to Future Public Involvement Throughout the Life of this Program**

If the Forest Service insists that there will be no future site-specific NEPA analysis as part of this program, then the Forest Service must make a greater commitment to inform and engage affected communities throughout the selection, design and implementation of a project. Simply posting a list of projects annually, along with updated information, to the Forest's website and social media does not cut it. At a minimum, the Forest Service should issue public notice in the local newspaper as well as via its email list for this project prior to starting field work each year (i.e. before hand / mechanical treatments begin, and before prescribed fire begins). The Forest should also host a public meeting in the nearest affected community early in the design phase of project implementation so the public can learn more about the project and offer input. Field trips to treatment areas should be considered, especially for projects greater than 100 acres. An example of how better, continual public engagement may work can found in Appendix E of the FEIS for the Spruce Beetle Epidemic and Aspen Decline Management Response on the Grand Mesa, Uncompahgre, and Gunnison National Forests.

Another idea would be for a citizen-led task force or collaborative to help with design and implementation of the public engagement process for projects each year. While this is no substitute for formal public scoping it could be the bridge to the expedited efforts to put more prescribed fire on the ground with better understanding within communities.

## **21. Tribal Consultation**

We were disappointed to learn that the Forest Service had not succeeded in conducting any meaningful consultation with any Tribe that has historical ties or Treaty Rights on the Forest prior to issuing the EA. We strongly encourage the Forest Service to fulfill its trust responsibility and complete consultation before issuing a final decision. This program offers unique opportunities to effectuate the Joint Secretarial Order 3403 “On Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters,” and we encourage the Forest Service to consider further consultation with this order in mind. While we recognize that consultation and co-stewardship opportunities are often challenged by a lack of capacity on the part of many Tribal Nations, as well as the Forest Service, we encourage the Forest Service to help interested Tribal Nations fund positions that boost their capacity to engage with the Forest Service on a government-to-government basis.

## **22. Comments Specific to the Badger-Two Medicine Area**

In addition to our concerns discussed elsewhere in this letter, we have several comments specific to the Badger-Two Medicine area of the Forest. First, we reiterate what the Forest Service itself acknowledges, that it has a trust and legal responsibility to conduct meaningful consultation with the Blackfeet Nation, not only on this programmatic EA, but also on any potential site-specific projects in the Badger-Two Medicine. This is particularly important given the potential impacts projects may have on Blackfeet Treaty Rights, especially the right to gather timber, or culturally-significant sites and practices in the area. As noted above, this program presents a great opportunity to facilitate Forest Service – Blackfeet cooperation in management activities in the area along the lines envisioned in the Forest Plan and encouraged in the Joint Secretarial Order. This could include co-developing or implementing projects or explicit inclusion of design features to benefit cultural values and practices, including cultural burning.

Second, we absolutely oppose the use of ground disturbing motorized and mechanical equipment, like tracked or wheeled vehicles such as skidders, feller bunchers, harvesters, loaders etc. beyond currently open roads in the Badger-Two Medicine. The 2009 Travel Plan closed the area to motorized use in recognition of its outstanding wildlife habitat and other ecological values, to protect Blackfeet cultural values and uses in the area, and to provide for quiet, traditional forms of recreation. The Forest Plan reinforced non-motorized travel in the Badger-Two Medicine. The Wilderness inventory determined the area exhibits superb wilderness characteristics (FEIS (2020) Appendix E, pp. 186 – 191), and the Forest Plan classified nearly the entire area as “primitive” on the Recreation Opportunity Spectrum. Furthermore, the Badger-Two Medicine is also eligible for listing as Traditional Cultural District under the

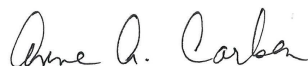
National Historic Preservation Act due to its preeminent cultural importance to the Blackfeet Nation. Past analysis, including by the Forest Service and the Advisory Council on Historic Preservation, and official public comment by Blackfeet leaders have repeatedly indicated that motorized use is incompatible with the attributes of the TCD. Therefore, in recognition of the area's outstanding ecological and cultural values, the plan should stipulate that only hand treatments and prescribed fire will be used in the Badger-Two Medicine.

Furthermore, any site-specific projects in the Badger-Two Medicine should prioritize previously high severity burn areas in the 2007 Skyland Fire, 2015 Family Peak Fire, or 2017 Crucifixion Fire where benefits to wildlife or greater protection from future fires to private / tribal land can be achieved. Re-growth after these fires is predominantly super-dense stands of lodgepole pine. Re-entry fire could help create beneficial heterogeneity in the recovering forest, and improve forage opportunities for various wildlife species. We can also support projects using hand tools and prescribed fire to create some defensible space for private property in the South Fork Two Medicine drainage, for residents along the eastern boundary with the Blackfeet Indian Reservation, or the community of Heart Butte. As with all projects, the local community should have the opportunity to contribute to the selection, design, and review of any proposed activities.

Finally, if the Forest Service plans prescribed fire activities in the Badger-Two Medicine, we encourage the Forest Service to prioritize contracts with Blackfeet-owned or managed forestry crews to perform the work, or else hire qualified Blackfeet tribal members as part of Forest Service crews to do the same. This will not only provide economic benefit, but could help strengthen partnerships between the Forest Service and Blackfeet Nation.

In closing, we appreciate your efforts to increase the use of prescribed fire rather than rely on mechanical thinning alone to reduce wildfire risk to communities and to restore natural fire, ecological integrity, and climate resilience to the Helena-Lewis and Clark National Forest. We look forward to continuing to work together to improve this proposed action as well as implement activities under its authorization.

Sincerely,



Anne Carlson, Director  
Crown of the Continent Landscape Program  
The Wilderness Society



Peter Metcalf  
Executive Director  
Glacier-Two Medicine Alliance



Bill Hodge  
Montana State Director  
The Wilderness Society