



Helena-Lewis and Clark National Forest  
C/O Emily Platt, Supervisor  
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Dear Supervisor Platt,

Thank you for the opportunity to participate in the Forest-wide Prescribed Fire Project meeting at the Lewis and Clark Public Library on Feb 20<sup>th</sup>. Helena Hunters and Anglers Association (HHAA) board members Gary Ingman and Doug Powell were present and participated. We appreciated your presentation and the open dialogue that followed.

We acknowledge the detrimental ecological effects that decades of fire suppression have had on our local landscape, and appreciate the need and interest in returning forest management to a more natural regimen. This is important now, more than ever, in the face of climate change and weather extremes. Fire on the landscape can benefit wildlife habitats in many ways, and Helena Hunters and Anglers Association encourages its conscientious use. We do, however, have a few questions and comments about terminology and some concern about how the project will be implemented.

- The expansive nature of this project across nearly 90% of the forest, with unclear guidelines for implementation, would seem to dictate a more thorough analysis via an environmental impact statement rather than simply an environmental assessment.
- Time Horizon: A 20- year project timeline is currently presented; we would recommend 10 years given how circumstances are changing rapidly.
- Inventoried Roadless Areas and recommended Wilderness: Please do not use mechanized equipment in these areas as well as other sensitive sites.
- Hiding Cover: It is so limited to begin with that what remains should not be burned. Most of the area already has landscape level disturbance that has depleted hiding cover.
- Funding: If this project is funded through timber sales, we are concerned there won't be any hiding cover left for wildlife when the project is over.
- "Any road or trail ... including those authorized for administrative use": The following statement in the Scoping document is concerning:

**“Access to prescribed burning treatment units may occur on any road or trail, including those authorized for administrative use by the District Ranger. Vegetation management would be used to prepare areas for of the effective use of prescribed fire. Mastication or brushing of road surfaces may be completed prior to implementation.”**

This appears to be the same approach taken in the Lazyman IRA during the Tenmile-South Helena Project that was legally and successfully challenged by HHAA. Clarification and possible amendment is needed.

- Burning has to be conducted conscientiously for the benefit of wildlife. This requires less intense burns. The technique used to initiate a prescribed fire generally starts with a perimeter established from either the ground or air, and then the fire is forced to burn inward. While this technique is designed for safety, it creates very intense and hot fires that prevent mosaic burn patterns conducive to creating better wildlife habitat. Low intensity burns that are allowed to creep around are natural and beneficial.
- A statement made at the public meeting indicated that prescribed fire in general will result in wildlife benefits. However, prescribed fire that is not specifically designed for wildlife has the potential to damage wildlife habitats.
- As projects accumulate on the landscape, there does not appear to be any provision for on-going cumulative effects analysis. This is a significant concern because even now, extended long-term projects are occurring over multiple decades, including projects such as Clancy-Unionville, Tenmile South Helena, Telegraph, Larabee-Hat, etc...

During discussion at and after the open-house meeting, we expressed an interest in having opportunities annually to providing site-specific input at the individual project level regarding where prescribed fire could benefit wildlife. We were assured by Supervisor Platt, Forest biologist Pengeroth, and District Ranger Bushnell that HHAA would have such an opportunity. It was recommended that we provide comments relevant to this topic in the record. We are requesting such site-specific input opportunity and a mechanism to accomplish that, with the submittal of this document. We would like to extend that conversation to include our recommendations for wildlife security areas that should be spared from burning.

Our membership has decades of knowledge about local wildlife, wildlife habitat, and usage patterns on the Helena National Forest. We believe in and support the benefits of carefully designed prescribed fire for wildlife, and we are encouraged and motivated to work with you on this project. We offer the following suggestions as to how we can assist you in this effort:

MECHANISM to incorporate wildlife benefits into Prescribed Fire Projects -

- Contact is made with HHAA before project planning occurs on individual projects emanating from this process.
- Consultation occurs to provide a venue for sharing wildlife data, including HHAA and FWP wildlife and fisheries biologists.

- Jointly review detailed maps of proposed project.
- Facilitate a dialogue to understand the intrinsic purposes of the project and how wildlife benefits can be incorporated.
- Develop site-specific recommendations for improving wildlife habitat based on the discussions.

Thank you once again for encouraging our participation in development of the Forest-wide Prescribed Fire Project.

On behalf of wildlife, their habitat and movement corridors, Helena Hunters and Anglers Association look forward to working with the Helena-Lewis and Clark National Forest across the Helena portion of the Forest-wide Prescribed Fire Project.

Sincerely,

Steve Platt, President

Helena Hunters and Anglers Association