

Helena-Lewis and Clark National Forest Land Management Plan Revision Objection Template

Objector's name: William J (Bill) Hallinan

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Name of lead objector (if more than one): NA, objecting on behalf of myself.

Please specify whether this objection is to the Helena-Lewis and Clark National Forest Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

- ☒ **Land Management Plan: Helena-Lewis and Clark National Forest 2020 Land Management Plan, Forest Supervisor Bill Avey.**
- ☐ **Regional Forester's List of SCC**

General Statement of issues of the plan revision to which the objection applies:

In my October 2018 comments, I mentioned the necessity of restraint to preserve as much wild lands as possible free of mechanized and motorized use. The 2020 plan revision does not note the potential for and importance of Wilderness in eligible landscapes in roadless areas.

Why is this important? On July 15, 2020, during the objection period, President Trump made an announcement that if carried out, will fundamentally undermine the rational basis for the 2020 Forest Planning process. See: <https://www.whitehouse.gov/briefings-statements/president-donald-j-trump-modernizing-federal-environmental-reviews-accelerate-americas-infrastructure-development/>. More precise and intentional language is required to make the intent of the 2020 plan clear.

Specific Statements of issues and/or parts of the plan revision to which the objection applies. Use concise statements explaining the objection and suggesting how the proposed plan should be improved:

- 1. 2020 Land Management Plan, Page 79, sentence "Management activities shall follow direction found in the 2001 Roadless Rule (36 CFR 294 Subpart B, published at 66 Fed Reg. 3244-3273)."**

- **The reasons for this objection are:**

The sentence misstates the guidance under which the organization operates.

- **Proposed Solution:**

Revise sentence to read, "Management activities shall follow direction found in the 2001 Roadless Rule (36 CFR 294 Subpart B, published at 66 Fed Reg. 3244-3273) and subsequent guidance provided through litigation. See page [Roadless Rule Litigation Page](#)."

- 2. 2020 Land Management Plan, Page 82, section Suitability (FW-IRA-SUIT) is missing a suitability statement.**

- **The reasons for this objection are:**

Clarity. FW-IRA-SUIT describes some, but not all, suitable activities. A central statement is missing. A principal suitable activity is preserving IRAs as the inventory of wildlands and lands eligible for Wilderness designation.

- **Proposed Solution:**

Add a fourth suitability, "04 Inventoried roadless areas are maintained as an inventory of wildlands and lands eligible for potential Wilderness designation."

3. 2020 Land Management Plan, Page 156, the section "Recommended Wilderness - There are no recommended wilderness areas in the Elkhorns GA." is misleading.

- **The reasons for this objection are:**

Clarity. The Elkhorn WMU is a unique, but unprotected designation under federal law. Effective Forest Service management suffers because of the WMU's lack of federal definition and statutory requirements.

- **Proposed Solution:**

Replace "There are no recommended wilderness areas in the Elkhorns GA." with "Although, there are no recommended wilderness areas in the Elkhorns GA, the wilderness characteristics of the Elkhorns supports the Wildlife Management Unit's purpose. The designation of the Elkhorn as a Wildlife Management Unit (WMU) is a unique, but an unprotected designation under federal law."

Signature: William J. Hallinan

Send electronic objections via: the CARA objection webform at <https://cara.ecosystem-management.org/Public/CommentInput?project=44589>. Electronic submissions must be submitted in a format (e.g. Word, PDF, Rich Text) that is readable with optical character recognition software and be searchable.

Send written objections to: USDA Forest Service, Objection Reviewing Officer, Northern Region, 26 Fort Missoula Road, Missoula, MT 59804. Office hours are Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding Federal holidays.

Send faxed objections to: (406) 329-3411.

The fax coversheet must include a subject line with "Helena – Lewis and Clark Land Management Plan Objection," or "Helena – Lewis and Clark Species of Conservation Concern" and should specify the number of pages being submitted. Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8:00 a.m. and 8:00 p.m., Eastern Standard Time, Monday through Friday.