

July 20, 2020

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Regional Forester Leanne Marten  
Objection Reviewing Officer  
USDA Forest Service Northern Region  
Via CARA Objection Webform:

<https://cara.ecosystem-management.org/Public/CommentInput?project=44589>.

Subject: Helena - Lewis and Clark Forest Plan Objection

Dear Regional Forester Marten:

We write today on behalf of the Upper Blackfoot Working Group (UBWG) to object to portions of the Draft Record of Decision, Final Forest Plan, and Final Environmental Impact Statement for the Helena - Lewis and Clark National Forest (HLC). The Responsible Official for the HLC plan revision is Bill Avey, HLC Forest Supervisor.

The UBWG appreciates the efforts of the HLC planning team to respond to public input throughout the planning process. We also applaud the Forest Service for incorporating several components of the UBWG's collaboratively developed recommendations for the Upper Blackfoot Geographic Area in the revised plan.

We do however object to several components of the Final EIS and Draft Record of Decision and request that the Forest Service make the specific changes outlined in this objection letter to improve the final plan so it is more consistent with our collaboratively developed recommendations for the Upper Blackfoot GA.

The UBWG is a collaborative group consisting of Lincoln valley residents, conservation organizations, mountain bikers, hunters, anglers and motorized users. For five years this group has been working with local constituents to develop a comprehensive land management proposal to guide forest management in the Upper Blackfoot Geographic Area (UBGA). Our proposal recommends a variety of designations for key areas within the UBGA for forest restoration, conservation management, recreation, and recommended wilderness. The Helena-Lewis and Clark NF Forest Plan Revision provides an important opportunity for us to advance our long-term landscape goals.

Every designation and proposed trail corridor within the UBWG's consensus landscape proposal was formed through a collaborative process involving local residents in addition to the previously mentioned user groups. Throughout this process, the working group has also sought

and gained support from statewide conservation groups, hunters and anglers, wildlife enthusiasts, backpackers, motorized and mechanical recreation groups, snowmobilers, and the Lewis and Clark County Commission.

This process has led to a well thought out and well received plan with extensive support. As such, we ask that the Helena-Lewis and Clark National Forest adhere to the recommendations within our proposal and mirror the designations, and boundaries, found within it. Attached is our current proposal, maps of the UBGA as we would like to see it designated, and our current list of supporters.

Below we make specific objections to the FEIS and DROD and provide requested solutions that will improve the final decision and make it more consistent with our consensus landscape proposal. The UBWG has submitted formal comments to the HLC Plan Revision Team during every stage of the process open for public comment.

### **Specific UBWG Objections and Proposed Solutions**

**Objection #1:** UBWG objects to the location of the Nevada Mountain RWA northern boundary.

**Solution:** UBWG requests that the HLCNF move the northern boundary to be consistent with the boundary in our consensus landscape proposal. **See attached map.**

**Objection #2:** UBWG objects to the location of the Silver King RWA (Scapegoat Wilderness Inclusion).

**Solution:** UBWG requests the boundary be changed to be consistent with the boundary in our consensus landscape proposal (**see attached map**), with continued protection of Alice Creek as a National Historic District, Conservation Area and under current travel management without change.

**Objection #3:** UBWG objects to the removal of Arrastra Creek from inclusion as a Recommended Wilderness Addition to the Scapegoat Wilderness.

**Solution:** UBWG requests the inclusion of the Recommended Wilderness boundary for Arrastra Creek put forward in our consensus landscape proposal. **See attached map.**

**Objection #4:** UBWG objects to specific components of the Summer Recreational Opportunity Spectrum map that conflict with our consensus landscape proposal in the areas of Stemple Pass, Gould-Helmville Trail, and South Poorman Creek.

**Solution:** Adjust the Summer ROS map to be consistent with the proposed future trail corridors for mountain bikes and OHVs in the UBWG consensus landscape proposal. **See attached map.**

The Upper Blackfoot Working Group is appreciative of the opportunities for input provided by Helena-Lewis and Clark National Forest Staff during this forest plan revision process. The HLCNF has been a strong partner for the people of Lincoln and we look forward to working with you in the future.

Thank you,

**Karyn Good-** Gehring Ranch, *Lead Objector*

**Brent Anderson-** Lincoln Resident and Owner of Local Timber Company

**Paul Roos-** Retired Outfitter and Educator

**Bill Cyr-** Lincoln Restoration Committee

**Rod Bullis-** Professional Forester

**Pat Hagen-** Ponderosa Snow Warriors

**Ron Zarr-** Ponderosa Snow Warriors

**Zach Muse-** Lincoln Fire Chief, Upper Blackfoot Community Council

**Russ Ehnes-** Montana Trail Vehicle Riders Association

**John Gatchell-** Montana Wilderness Association

**Eric Grove-** Retired Owner of Great Divide Cyclery

**Jordan Reeves-** The Wilderness Society