

Interested Person Request

I would like to participate as an interested person in the objection resolution discussions for one or more of the identified objection issues for the Helena-Lewis and Clark Land Management Plan or the regional forester's list of species of conservation concern (SCC).

Name: Blake Busse, The Pew Charitable Trusts

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Name of lead interested person (if more than one):

I am interested in participating in any resolution discussions between the objector(s) and the reviewing official for the following objection issues:

- Motorized and/or mechanized recreation access and suitability determinations in recommended wilderness and primitive recreation opportunity spectrum (ROS) settings.
- Land management plan direction related to wilderness, wilderness study areas, recommended wilderness, and inventoried roadless areas.
- Areas recommended for wilderness designation.

Please provide a brief explanation of your interest in the objection(s) and any specific concern(s), including a description of your support or opposition to the objection(s):

The Pew Charitable Trusts, through its U.S. Public Lands and Rivers Conservation program, works to conserve and connect areas of biodiversity critical to species' survival by identifying and preserving important tracts of lands throughout the American West. Consistent with this objective, Pew has an interest in the lands of the Helena-Lewis & Clark National Forest and the agency's implementation of its 2012 planning rule (36 CFR 219). Given our mission, Pew has a particular interest in the rule as it applies to the identification and management of recommended wilderness and the utilization of other management strategies to protect valuable habitat.

Consistent with our interests described above and previously submitted substantive comments (see below), Pew is concerned with objections that seek to allow activities that would diminish the wild character and other values within ecologically important areas on the forest or that would reduce in size or eliminate areas managed for the conservation of these values. In particular, Pew has an interest in the following:

- The proper identification of areas recommended for wilderness, which can be achieved by:
 - Retaining wilderness recommendations in the approved forest plan for the Big Log, Big Snowies, Blackfoot Meadows (Electric Peak), Dearborn Silverking, Mount Baldy, Nevada Mountain, and Red Mountain areas, but with boundaries modified to reflect those suggested in Pew's comments on the draft EIS; and
 - Recommending in the approved forest plan the Arrastra Creek, Deep Creek/Tenderfoot Creek, Camas Creek, Loco Mountain, and Middle Fork Judith areas for wilderness designation with the boundaries as suggested in Pew's comments on the draft EIS.

- The proper management of recommended wilderness areas, which can be achieved through the retention of plan components that prohibit motorized and mechanized uses in these areas.
- The management of “large, remote, wild, and predominately unmodified landscapes” (HLCNF 2020 Land Management Plan, FW-ROS-DC-02, p.65) for the retention of those characteristics, which can be achieved by either:
 - Recommending those areas wilderness designation and managing them as such, or
 - Removing the suitability determination for mechanized use in the Primitive Recreation Opportunity Spectrum (ROS) setting or, in the alternative, adding an affirmative determination that mechanized use is not suitable within Primitive ROS. The retention of the existing suitability determination would unacceptably blur the distinction between the Primitive ROS and Semi-Primitive Non-Motorized ROS settings.

Please identify when you commented during the planning process (scoping, draft EIS, and/or final EIS):

The Pew Charitable Trusts submitted substantive comments during the draft EIS comment period on August 28, 2018 via the agency’s CARA web portal. Pew’s substantive comments pertained to the issues to which we are requesting “interested person” status – namely, the identification and management of recommended wilderness areas. Pew’s comments were further supported by the submission of an attached report prepared by Conservation Science Partners entitled “A landscape-level assessment of ecological values for the Helena-Lewis & Clark National Forest,” which provided further scientific support and rationale for Pew’s comments.

Signature: Blake Busse

Send electronic letters requesting recognition as an interested party to: <https://cara.ecosystem-management.org/Public/CommentInput?project=44589>. Electronic submissions must be submitted in a format that is readable with optical character recognition software (e.g., Word, PDF, Rich Text) and must be searchable.

Faxed requests must be submitted to (406) 329-3411 The subject line needs to include “Helena – Lewis and Clark Plan Revision Interested Persons” and should specify the number of pages being submitted.

Written requests submitted via USPS, FedEx, UPS, or other courier should be mailed to: Leanne Marten, Reviewing Officer, USDA Forest Service, Attn: Helena – Lewis and Clark Planning Objections, 26 Fort Missoula Road, Missoula, MT 59804.

If you are unable to submit electronic, fax, or postal requests and must submit them by hand to the Northern Regional Office, please refer to signage at the front door regarding the delivery of hand delivered items, which will include a phone number to arrange delivery of your objection. Office hours are Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding Federal holidays.

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.