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Organization:

Title:

Comments: Please see Attachments

Issue: I wish to thank to Supervisor Avery for recommending seven RWAs and recognizing within the Preliminary Administrative Recommendations that [ldquo][hellip] motorized uses (including snowmobiles) and mechanized means of transportation (mountain biking) are unsuitable in recommended wilderness.[rdquo]

However, the recommendation to close motorized and mechanized uses within the RWAs within 3 years from the date of the final decision on the Plan is simply too long. That timeframe will allow non-conforming uses to embed and further erode wilderness character, even while the revised Forest Plan acknowledges they are unsuitable. Implementing an unsuitability determination and promptly amending the Travel Plans is necessary to ensure compliance with the 2012 planning rule (FSH 1909.12, section 21.8) requirement to [ldquo]protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo]

Supervisor Avery also acknowledges in the Plan Revision the unique relationship between the Forest and the Montana High Divide Trails Partnership (MHDT), a consensus-based group that has ironed out differences between user groups that, in turn, help the Forest work more effectively. I was one of the original signatories on the 2007 Cooperative Agreement of the Partnership. Within that agreement was proposed the Bison Mountain and Kading [ndash] Cliff Mountain Trails Project for the purpose of creating multi-use trails circumnavigating the Electric Peak RWA, with the aim of subsequently providing for the removal of mechanized use in within the RWA. That agreement was signed 13 years ago. (See attached agreement.)

Between 2008 and 2011, members of the Partnership, including me, helped the Helena Ranger District complete the Bison Mountain-Josephine (CDT trail) in 2011. From 2017-2019, Partnership members helped fund and subsequently build the Kading-Cliff Mountain Trail. Again, I helped physically build that trail with the goal of fulfilling the 2007 Partnership condition that mechanized/motorized use be removed from the Little Blackfoot Meadows and Electric Peak areas once the trails were built to allow for bike use. In fact, in the Recreational Trails Application, made by Montana Bicycle Guild for the completion of the Kading-Cliff Mountain Trail, the following statement is made: [ldquo]The pending Helena-Lewis and Clark Plan Revision is expected to reconfirm the status of Electric Peak Recommended Wilderness Area (RWA), and in keeping with the Region 1 policy, will eliminate mountain bike use in the RWA. This represents a significant loss of opportunity for mountain bike users, but, fortunately, that loss has been anticipated and a solution developed by MHDT.[rdquo]

All conditions of that partnership project are now fulfilled and it is time for the Forest to reward the diligent actions of the Partnership and promptly amend the Travel Plan and remove mechanized use from Electric Peak RWA.

Objection: My objection relates specifically to the timeframe within which the Plan recommends removal of motorized and mechanized uses within RWAs, and specifically within the Electric Peak RWA, given the multi-user group agreement with the Forest to address and solve recreational conflicts.

6) How the proposed plan revision may be improved (link to agreement)

My recommended solution is that the HLCNF issue an order to amend the relevant travel plans, concurrently with the Forest Plan revision, closing the RWAs to motorized and mechanized transport. Issuing such an order

concurrently with the plan revision is authorized by the planning rule directives and would be the most straightforward and efficient way to implement the suitability plan component prohibiting non-conforming recreational uses. At the very least, the HLCNF should move immediately to close the Electric Peak RWA to mechanized use due to the unique efforts that have gone on there to address multi-user conflicts.

7) Link to the objector's prior formal substantive comments

I have specifically worked in good faith with a multi-use group convened by Montana Wilderness Association to provide alternative trails to bike use in the Little Blackfoot Meadows RWA. Further, I have worked over the last 30 years to secure recreational trails that integrate with Forest lands south of Helena, including purchasing trail right of way, building trails, helping pass open space bonds, and serving on the Prickly Pear Land Trust board. I am increasingly dismayed at what I have witnessed on Helena-area Forest lands in the last five years: quickly accelerating mountain bike use involving speed and technical maneuvers that endanger other trail users.