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Comments:
Helena-Lewis and Clark National Forest Land Management Plan Revision Objections

Issue statements are each related to desired outcomes listed in my original comments submitted 08/20/2018.

Primitive Recreation Opportunity Spectrum (ROS)
Issue: A decision that mechanized use is "suitable" in primitive ROS areas outside of Wilderness and recommended Wilderness could seriously endanger protection of these lands. Primitive areas have historically been set aside for traditional foot and stock use and managed to retain their remote, wild and predominantly unmodified character.

Objection: I object to the Forest Service classing mechanized use as "suitable" in primitive areas outside of recommended Wilderness and Wilderness.

Remedy: The (FW-ROS-SUIT-02) should be removed from the Primitive suitability section for areas outside of recommended wilderness. The site specific decision for primitive ROS means of travel outside of recommended wilderness should be analyzed within three years.

Middle Fork Judith WSA
Issue: This drainage is exceptional wildlife habitat and has the potential to be a blue ribbon fishery. The 2007 travel plan excluded motorized uses on many trails in the WSA and the land has since healed from abuses that occurred during that time. Restoration plans are currently underway in the abused riparian segment. The presence of some roads and private inholdings adjacent to the area is not adequate reason to exclude this outstanding wild area from recommended Wilderness.

Objection: I object to the exclusion of the Middle Fork Judith as recommended Wilderness.

Remedy: Recognize the significant public support for this WSA and adopt the boundaries in Alternative D, which includes 62,452 acres of RW and does not impact existing motorized use.

Big Snowies Wilderness Study Area (WSA)
Issue: The western boundary, as proposed, does not adequately protect the wild character and existing traditional uses in this remarkable area. The trails on the south slope of the Big Snowies, and one of the trails from Crystal Lake to the Ice Caves, are steep foot and stock trails that should be included in the recommended Wilderness. Mountain biking in this area is very minimal and not well suited to the steep trail. West Peak also provides a better physical boundary.

Objection: I object to the boundaries for the recommended Wilderness in the Draft
Record of Decision (DROD) and ask that the western section be given greater protection.

Remedy: The Neil Creek Trail (#654), Blake Creek Trail (#655), and Timber Creek trail (#676) should be included in the RW. The Crystal Cascades Trail (#445 and #445a) should also be included in the RW and the boundary aligned with the existing snowmobile area. The trail from Crystal Lake to the Ice Caves (#493) should be included in the RW. The trail from Crystal Lake to West Peak and west should be included in the Grandview Recreation Area (#403, #490). This would provide an opportunity for a good ride for mountain bikers if trail maintenance is

completed on trail #490, west of West Peak, and on trail #483 (Dry Pole Creek).

Arrastra Creek
Issue: Arrastra Creek is directly adjacent to the Scapegoat Wilderness and is included in the Upper Blackfoot Proposal. This is an area with high values for habitat, scenery and solitude. Unfortunately it was not included a part of the Wilderness proposal.

Objection: I object to the exclusion of Arrastra Creek as recommended Wilderness.

Remedy: Arrastra Creek should be recommended Wilderness and the boundaries the same as the Upper Blackfoot Proposal. It is a natural and necessary extension of the Scapegoat Wilderness.

The Badger-Two Medicine
Issue: The Blackfeet people have long relied on the sacred Badger-Two Medicine for their cultural practices. They have stated that recreational mechanized uses are not compatible with the cultural values of the Badger-Two Medicine, a place of creation and cultural learning and healing. The area has exceptional value as habitat and watershed, deserving of the highest level of protection.

Objection: I object to continuing recreational mechanized use in the Badger-Two Medicine.

Remedy: I ask you to honor Blackfeet wishes and designate the Badger-Two Medicine unsuitable for recreational mechanized use consistent with the current legislation proposed