

Data Submitted (UTC 11): 7/17/2020 6:00:00 AM

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Organization:

Title:

Comments: Helena Lewis and Clark National Forest Plan

Attn: Objection Reviewing Officer

USDA Forest Service Northern Region

26 Fort Missoula Rd.

Missoula, MT 59804

Reviewing Officer,

I object to the Helena/Lewis and Clark National Forest Plan, project #44589, for the following reasons:

1) FALSE STATEMENT

I provided comments to the HLCNF concerning the direction of the Forest to further reduce motorized access. My comment submitted on 10/7/2018 reads "the US Forest Service continues to reduce the number of available motorized routes" and "The Forest Service needs to take steps to restore lost motorized opportunities". In the FEIS under section 3.17 Recreation Opportunities it states: "There were no issues raised for recreation opportunities during the scoping period for the proposed action and/or comment period on the DEIS". This statement is false.

The Forest Service must consider the needs of the motorized community, not ignore them.

2) CREATES WILDERNESS

I also mentioned in my comments that I oppose the creation of Recommended Wilderness Areas. Past actions of the Forest prove that these areas are treated as "Wilderness" by the FS without Congressional approval. My comment states: "More RWA's will close these areas to 97% of the recreating public, and is not acceptable."

This Plan creates over 200,000 acres of recommended wilderness.

The RWA's in this plan do not meet "Wilderness" criteria. The Wilderness Act defines "Wilderness" as an area "retaining its primeval character" "without permanent improvements" and "the imprint of man's work substantially unnoticeable". These RWA's contain miles of roads and many historic mine sites,

clear evidence of man's activities.

Not only are my concerns not addressed, but the FEIS goes even further. In the document, Mr. Avey admits that man's presence is evident in the RWA'S, but HE has decided to create wilderness by removing this evidence. On page 27 he writes: "I will initiate site-specific NEPA decision per the Plan's suitability to close uses within the recommended wilderness areas within 3 years from the date of this decision". The Wilderness Act of 1964 states these areas are "preserved" not created.

The Wilderness Act explains Wilderness recommendations originate from the Secretary of Agriculture or the

Chief of the Forest. Then the findings are reported to the President, who then makes a recommendation to the US Congress. "Each recommendation of the President for designation as "wilderness" shall become effective only if so provided by an ACT of Congress."

The Forest Service must remove all recommended wilderness areas from the Forest Plan.

3) INCONSISTENT WITH NATIONAL DIRECTIVE

The Secretary of Agriculture, issued a new directive in June of 2020. His memorandum outlines a new direction for the Forest Service emphasizing increased access and the importance of recreational opportunities. His memo states " the Forest Service will: increase access to the Forest Service lands by streamlining the permit process for recreational opportunities" and "open public access to National Forest System lands with currently limited access where feasible in cooperation with States, counties, and partners".

The HLCNF Plan greatly reduces access to our National Forests in direct opposition to Secretary Purdue.

The forest needs to reconsider the effects of this Plan for consistency with the National Directive.

4) NEW INFORMATION ADDED WITHOUT OPPORTUNITY FOR PUBLIC COMMENT

During the scoping process, the public was led to believe that the Forest Plan would not make site specific decisions. that the Plan was like a zoning document that would not affect current uses. Even the FEIS Summary states" the Forest Plan does not authorize site-specific projects or activities", but page 27 of the FEIS Record of Decision Mr. Avey says "I will initiate site-specific NEPA decision per the Plan's suitability direction to close uses within the recommended wilderness areas within 3 years from the date of this decision".

If this information, that clarifies the Forest's true intention, to close specific, historical uses, was made available to the public prior to the formal comment period, the public outcry would be significantly greater. This new information, only available in the FEIS, unfairly limits public involvement.

On July 14, only a few days from the Objection deadline, I received an email from the Forest Service notifying me that there was an error in the FEIS, Summary, and draft ROD, and an Errata document is available for me to review. It appears that an additional 19,000 acres in the Elkhorns are to be closed to over-snow recreation. As an avid snowmobiler this is very alarming on me. This is a very significant change. The constraints of time have not allowed me to study the areas and evaluate the full impact of this decision.

The public was not allowed to comment on this closure or it's impacts. The Forest actions must be transparent. This action only increases the public's distrust of the Forest Service.

This process has been unfair and the Plan should be withdrawn.

I look forward to the opportunity to work with the Forest to address these issues.