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Comments: Please find attached the objection letter from the Glacier-Two Medicine Alliance re: the Helena-Lewis and Clark National 2020 Land Management Plan. Thank you.

Dear Regional Forester Marten: Greetings from the spectacular Badger Two Medicine country! On behalf of our hundreds of members and supporters, Glacier-Two Medicine Alliance (GTMA) writes pursuant to 36 CFR Part 219 Subpart B to offer formal objections to the 2020 Land Management Plan (Revised Forest Plan) for the Helena-Lewis and Clark National Forest (HLCNF), the accompanying Draft Record of Decision (DROD), as well as the Final Environmental Impact Statement (FEIS) for the Revised Forest Plan. The Responsible Official for the HLCNF Revised Forest Plan is William [redacted] Bill [redacted] Avey, the HLCNF Forest Supervisor. Formed in 1985, GTMA is a grassroots conservation organization whose mission is [redacted] Dedicated to the protection, stewardship, and shared enjoyment of the culturally- and ecologically- irreplaceable wildlands of the Badger Two Medicine and its interconnected ecosystem. [redacted] We commend the HLCNF for their hard work revising the existing forest plans. We particularly appreciate the many opportunities the HLCNF provided for public participation throughout the multi-year planning process and for the effort the HLCNF has made to listen and respond to public concerns throughout this process. GTMA has standing to file this objection. GTMA participated extensively in the Revised Forest Plan revision process, including: [redacted] Attended public listening sessions. [redacted] Submitted comments on Desired Future Conditions on January 15, 2016. [redacted] Submitted comments on Wilderness Evaluation Inventory and Timber Suitability on March 9, 2016. [redacted] Submitted comments on Sept. 28, 2016 on the Grizzly Bear Habitat Amendments developed for the Flathead National Forest and subsequently incorporated into HLCNF [redacted] current and Revised Forest Plans. [redacted] Submitted comments on the Proposed Action on March 17, 2017. [redacted] Submitted comments on the Draft Forest Plan and Draft Environmental Impact Statement on Oct. 5, 2018. Glacier-Two Medicine Alliance Our objections are directly tied to these comments. We object to four aspects of the plan for the Badger Two Medicine Special Emphasis Area: 1) The removal of RM-BTM-STD-02 from the Revised Forest Plan; 2) The lack of a non-suitability determination for motorized travel in the Badger Two Medicine; 3) The lack of a non-suitability determination for mechanized travel in the Badger Two Medicine; 4) Monitoring questions and indicators for the Badger Two Medicine. We also object to two Forest Wide issues: 1) The faulty assumption that mechanized use is, by default, suitable in [redacted] primitive [redacted] Recreation Opportunity Spectrum settings; 2) Inadequate Wilderness recommendations. Specific remedies to improve the Revised Forest Plan are provided. Pursuant to 36 C.F.R. 218.11(a) we request to meet with the Reviewing Officer to discuss and resolve these objections. Before laying out our objections in detail, let me first say that the Forest got a lot right with the Revised Forest Plan. For the Badger Two Medicine, we appreciate and agree with Forest [redacted] recognition of the area [redacted] significance to the Blackfoot Nation, the articulation of a role for the Blackfeet in future decisions, the emphasis on maintaining the undeveloped character of the area and managing for naturalness and ecological processes, the classification of the area as Primitive under the Recreation Opportunity Spectrum, the determination that the area is unsuitable for timber harvest, and the determination that over 60 miles of streams are eligible for protection in a free-flowing state under the Wild and Scenic Rivers Act. Objections related to the Badger Two Medicine Special Emphasis Area Objection #1 [redacted] The Forest Service should not have removed Standard 02 for the Badger Two Medicine (RM-BTM-STD 02) from the Revised Forest Plan. The Draft Revised Forest Plan (June 2018) included the following standard: Management activities within the Badger Two Medicine area shall not pose adverse effects to the Badger Two Medicine Traditional Cultural District. Management activities shall consider scientific research and ethnographic research as they relate to Blackfoot cultural and land-use identities when analyzing project effects. (RM-BADGER TWO MEDICINE-STD 02 [redacted] p. 172, emphasis added) GTMA supported the inclusion of this standard in our comments because it will help protect the integrity of the Badger Two Medicine Traditional Cultural District (TCD). Disconcertingly, the standard was stripped from the final plan without any

explanation. There is neither mention nor explanation for its removal in either the DROD or the FEIS. None. The DROD states only [ldquo]minor changes[rdquo] were made to the plan components for the Badger Two Medicine special emphasis area between the DEIS and FEIS.¹ This is wrong. Several plan components changed from the draft to the final plan in addition to the removal of Standard 02.21 DROD p. 36.2 Besides the removal of Standard 02, the Forest replaced Desired Condition Statement 01 and added a new suitability provision (RM-BADGER TWO MEDICINE-SUIT 02), neither of which were acknowledged or explained. The Forest[rsquo]s rationale is further obscured by the fact that the FEIS continues to list the plan components from the Draft Revised Forest Plan (2018) in Table 211 (FEIS, Chapter 3 Part 2, p. 119). Glacier-Two Medicine Alliance supported the Glacier-Two Medicine Alliance. The lack of acknowledgement and justification for the change clearly violates the Forest Service[rsquo]s 2012 Planning Rule which obligates the HLCNF to be transparent and to provide a documented rationale for its decisions.³ Furthermore, the failure to justify almost certainly qualifies the removal of Standard 02 as arbitrary and capricious in violation of the National Environmental Policy Act and Administrative Procedures Act. In personal communications, the forest plan revision team leader and other planning staff indicated the HLCNF removed Standard 02 to comply with US Forest Service (USFS) planning directives in the Forest Service Handbook (FSH) on writing plan components.⁴ The directives state that plan components: [ldquo]May be used to carry out laws, regulations, or policies but should not merely repeat existing direction from laws, regulations, or directives.[rdquo]⁵ However, forest plans do this all the time, even this one. The new Standard 02 for the Badger-Two Medicine, for example, essentially repeats Executive Order 13007 [ldquo]Indian Sacred Sites.[rdquo]⁶ In the very next section of the plan [ndash] Rocky Mountain Front Conservation Management Area [ndash] the standards repeat almost verbatim the statutory language of the Rocky Mountain Front Heritage Act.⁷ Even if the removal was truly a good faith attempt to apply the planning team[rsquo]s interpretation of this directive, the application of that directive to Standard 02 is misplaced. The relevant legal context here is Section 106 of the National Historic Preservation Act (NHPA), which authorizes the TCD. Section 106 states: The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. The head of any such Federal agency shall afford the Advisory Council on Historic Preservation established under Title II of this Act a reasonable opportunity to comment with regard to such undertaking. (16 USC 470f, emphasis added) The implementing regulations underscore the procedural nature of Section 106: Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. The procedures in this part define how Federal agencies meet these statutory responsibilities. The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of project planning. The goal of consultation is to identify historic properties inclusion of DC 01 and SUIT 02 in our comments and commends the Forest for these additions. However, these substantive changes still need to be documented in the FEIS and/or DROD as appropriate. In personal communications with Forest Plan Revision Team Leader Deborah Entwistle following the plan[rsquo]s release, Ms. Entwistle acknowledged the lack of documentation as a clerical error and stated the Forest would correct this error before issuing the final Record of Decision. We raise the issue here for the administrative record so that the necessary documentation does indeed occur.³ 77 Fed. Reg. 21,184 (Apr. 9, 2012); 36 C.F.R. 219.14 and 36 C.F.R. 219.134 See Attachment A [ndash] [ldquo]Follow-up to Today[rsquo]s Call[rdquo] June 1, 2020 Forest Service Handbook 1909.12, 22.1 emphasis added.⁶ 61 Fed. Reg. 26771-26772 (1996)⁷ See 16 USC 539r(b)(3)(B)(ii)(II) Glacier-Two Medicine Alliance potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. (36 C.F.R. 800.1., emphasis added) In sum, Section 106 ensures preservation values are factored into agency decision making and it establishes an important procedural and consultation framework for doing so. Under this framework, a federal agency must consider the potential adverse effects of a proposed action on the TCD and seek to mitigate if practicable; but it does not have to mitigate so long as the agency provides a rational

explanation for not doing so. Standard 02 does not merely repeat Sec. 106's procedural obligations. It adds a substantive and enforceable constraint on future site-specific undertakings in the Badger Two Medicine TCD. The USFS's Planning Regulations and Directives explain how standards should be written: Standards. A standard is a mandatory constraint on project and activity decision making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.7(e)(1)(iii), emphasis added) Elsewhere the directives explain: Standards are used when the requirement is absolute such as to ensure projects will not prevent achievement of a desired condition, or to ensure compliance with laws [hellip] [and] [Id] are stated in a precise manner, and with mandatory or prohibitive wording, such as [Id] must, [Id] shall, [Id] must not, [Id] may not, [Id] shall not, [Id] of XX is not allowed to be authorized [and] [Id] Are written clearly and without ambiguity so that consistency of a project or activity with a standard can be easily determined. (For definition of consistency, see 36 CFR 219.15) [8] Standard 02's use of the phrase [Id] shall not [Id] strengthens the procedural requirements of Section 106 and clarifies how site-specific projects and activities should be conducted to achieve the desired conditions. In no way does Standard 02 merely repeat law, policy, or regulation. It is substantive, not procedural, and would be applied in different decision-making contexts. [9] The importance of including Standard 02 should be further considered in light of the recent Advisory Council on Historic Preservation commendations of Blackfeet-Forest Service relations and their combined effort to protect the TCD from negative effects posed by potential oil and gas development. [10] The return of Standard 02 demonstrates a clear commitment by the Forest to actually protect the integrity of the TCD, not just consider the potential adverse effects in its decision making.

Remedy: ? Re-insert Standard 02 (RM-BTM-STD 02) from the draft Revised Forest Plan verbatim into the final Revised Forest Plan. [8] FSH 22.139 Internally, the Forest appears to have recognized this difference when it decided to remove Standard 02. In the same personal communication with the planning team, Deputy Archeologist Arian Randall, who was the forest plan team member responsible for matters pertaining to the TCD, elaborated on the Forest's rationale, stating the Forest removed the standard in order to retain greater flexibility when making future decisions about activities within the TCD. See Attachment A. [10] Advisory Council on Historic Preservation (Sept. 21, 2015). Comments on Historic Preservation Regarding the Release From Suspension of the Permit to Drill by Solenex LLC in Lewis and Clark National Forest, Montana. p. 8

Glacier-Two Medicine Alliance? Provide legally sufficient justification for the changes to the Badger Two Medicine plan components in the FEIS and forthcoming Record of Decision.

Objection #2 [ndash] The Revised Forest Plan should include a non-suitability component for motorized vehicles in the Badger Two Medicine. Under the 2009 Travel Management Plan for the Badger Two Medicine, motorized recreation is currently prohibited year-round except on approximately nine miles of roads open during the summer season. [11] The draft forest plan rightly reflected and affirmed these existing prohibitions by including in its first Desired Condition statement the phrase: [Id] The Badger Two Medicine is a large, undeveloped landscape that is open to nonmotorized recreation [hellip] [Id] [12] However, this statement was stripped out of the final plan without any explanation or justification in either the DROD or FEIS. Consequently, the Revised Forest Plan components for the Badger Two Medicine are now entirely silent on travel management. This is an error given the significance of modes of travel to the integrity of the Traditional Cultural District as well as the wildland and ecological values of the area that GTMA repeatedly identified in our comments. It is also inconsistent with other areas of the revised forest plan where existing travel management direction is repeated in the Revised Forest Plan components. [13] Admittedly, to its credit the Forest correctly listened to our recommendations and upgraded the Recreation Opportunity Spectrum classification for most of the area from semiprimitive non-motorized to primitive. The primitive classification includes two forest-wide suitability components that limit summer and winter motorized recreation in the Badger Two Medicine. [14] However, the primitive classification does not apply to all the lands in the Badger Two Medicine, leaving open the possibility of expanding motorized use in the future. We think a non-suitability component is needed to reinforce the current travel plan and ensure future decisions achieve desired conditions.

Remedy: ? Include a non-suitability component that reads: [Id] Motorized recreation is not suitable in the Badger Two Medicine area except on USFS routes authorized by the 2009 Travel Management Plan. [Id]

Objection #3 [ndash] The Responsible Official erred in its rationale when deciding not to determine the suitability of mechanized transport in the Badger Two Medicine. Despite the repeated request of GTMA, [15] the Blackfeet Nation, [16] Blackfeet traditionalists, [17] and other organizations and individuals, the HLCNF decided not to

address the suitability of 11 Travel Plan, 2009¹² Draft Forest Plan, p. 17²¹³ See for example the Rocky Mountain Front Conservation Management Area; Grandview Recreation Area and snowmobiles (SN-GVRA-SUIT 03)¹⁴ See FW-ROS-SUIT 03, FW-ROS-SUIT 05¹⁵ See comments submitted on March 31st, 2017 in response to the Proposed Action and on Oct. 5th 2018 in response to the draft Revised Forest Plan and DEIS.¹⁶ On Feb. 20, 2020, the Blackfeet Tribal Business Council submitted a letter to Forest Supervisor Bill Avey stating that “[mechanized uses are not compatible with the Blackfeet cultural values in the Badger Two Medicine area.]” A copy of the letter was provided to GTMA, see Attachment B.¹⁷ On Feb. 23, 2020, the Pikuni Traditionalists Association submitted a letter to Forest Supervisor Bill Avey which stated that bikes posed an “[adverse effect]” to Historic Trails within the Badger Two Medicine. A copy of the letter was provided to GTMA, see Attachment C. Glacier-Two Medicine Alliance mechanized transport, including mountain bikes, in the Badger Two Medicine. While we acknowledge the Forest has some discretion under the 2012 Planning Rule whether or not to make this determination,¹⁸ a non-suitability determination was warranted because mechanized travel/transport is “[not compatible with desired conditions for those lands.]”¹⁹ The HLCNF failed to provide any rational justification whatsoever for its decision not to address mountain bikes, as it is obligated to do here.²⁰ At the very least, the HLCNF should have analyzed whether mechanized travel posed an adverse effect to the TCD and documented their determination as part of their decision to permit mechanized travel to continue. In sum, the absence of a non-suitability determination for the Badger Two Medicine is an arbitrary and capricious decision that should be remedied for the following five reasons.

1. The Forest Supervisor’s rationale is unsubstantiated by the administrative record and should be overturned. In the DROD, the Responsible Official offered the following explanation for the HLCNF decision not to address the suitability of mountain bikes: Another exception was the desire from the Blackfeet Nation to make the Badger Two Medicine area unsuitable for mountain bikes. I decided against this because the issue was already addressed in the travel plan decision for that area. Travel management was not identified as an area needing change because it was recently decided through a thorough public engagement process.²¹ The Responsible Official’s statement is inaccurate. The HLCNF has never made a travel planning decision to allow mountain biking in the Badger Two Medicine. The recent travel management planning process to which the Responsible Official refers focused entirely on motorized recreation and did not explicitly analyze the suitability of mechanized travel in the Badger Two Medicine in any way whatsoever.²² On this matter, the travel planning record is clear. Travel planning was initiated solely to improve regulation of the rapidly expanding use of off-highway motor vehicles, particularly by all-terrain-vehicles (ATVs) in the summer. The Purpose and Need for Action states: Due to the increased popularity and use of ATVs since 1988, there is a need to address the effects of this type of vehicle on various resources and the suitability of trails to accommodate them.²³ The FEIS further identifies a need to assess expanding snowmobile use on the district: With the advent of more powerful snowmobiles there is an increasing risk of snowmobiles reaching designated Wilderness areas, disturbing sensitive habitats in the high country, or disrupting winter ranges at the lower elevations. There is a need to assess the effects of snowmobiling and identify suitable opportunity for this activity.²⁴ Nowhere in the travel management planning documents did the then Lewis and Clark National Forest (LCNF) identify a need to assess mechanized travel. This is not surprising.¹⁸ 36 C.F.R. 219.7(e)(1)(v)¹⁹ Ibid 20 36 C.F.R. 219.14²¹ Helena-Lewis and Clark National Forest, (May 2020), Draft Record of Decision 2020 Land Management Plan, p. 12²² Lewis and Clark National Forest (March, 2009) Rocky Mountain Ranger District Travel Management Plan Record of Decision for Badger Two Medicine.²³ Lewis and Clark National Forest, Final Environmental Impact Statement for the Rocky Mountain Ranger District Travel Management Plan, Oct. 1, 2007, p. 3, emphasis added²⁴ Ibid, p. 4, emphasis added Glacier-Two Medicine Alliance Travel planning on the Helena and the Lewis and Clark National Forests was motivated and guided by a recent statewide directive limiting off-highway vehicles²⁵ and the 2005 travel planning rule, which applies only to motorized vehicles, not to non-motorized forms of transportation like mountain bikes.²⁶ In promulgating the planning rule, the USFS made it abundantly clear that “[bicycles are distinct from motor vehicles and should be managed separately from them]”²⁷ and that “[this rule governs designation of routes and areas for motor vehicle use and does not apply to nonmotorized uses, such as bicycles.]”²⁸ Furthermore, while “[local Forest Service officials retain authority to regulate bicycles according to their local situation and needs,]”²⁹ there was little need to exercise this authority fifteen years ago when travel planning was initiated, because mountain biking was just emerging as a use on the district,³⁰

similar to ATVs back in 1988 when the former travel plan was written, whereas motorized use was exploding. Consequently, when conducting travel management the LCNF simply lumped mechanized travel in with foot and horse travel as a general non-motorized category that it then juxtaposed against various combinations of motorized use for the purpose of conducting analysis of significant issues and drafting alternatives.³¹ In fact, the only alternative that may have taken a more granular look at mountain biking was eliminated from consideration early in the planning process.³² Not surprisingly then, public comments, as well as the recommendations submitted by the Blackfeet Nation (which predominantly became the preferred plan alternative), hewed closely to the Forest's non-motorized/motorized division.³³ Likewise, the Record of Decision for the Travel Management Plan focuses entirely on explaining which routes/areas/seasons would be open or closed to motorized use.³⁴ In fact, the only sentence in the whole 84 page decision pertaining to mountain bikes simply acknowledged that potential safety conflicts involving bicycles may need to be addressed in the future.³⁵ In sum, while the travel plan did leave the Badger Two Medicine open to mountain biking, it did so by default, not as the result of careful analysis and thorough public input.³⁶ To decide that the suitability of mountain bikes does not need to be addressed in the revised forest planning process because this mode of recreation was addressed in a recent travel management process is completely arbitrary and capricious and not in accordance with the administrative record. Furthermore, the Responsible Official's rationale is clearly arbitrary when considered in 25 FEIS 2007, p. 926 36 CFR 212.5027 70 Federal Register 68,28428 70 Federal Register 68,27229 70 Federal Register, 68,28430 At the time, only 0.9% of forest visitors listed bicycling as their primary use of the forest. See Kocis et al., August 2002, [id] National Forest Visitor Use Monitoring Results [rd], cited in 13 supra, on Chapter III, p. 12631 FEIS 200732 Ibid, p. 2433 Public comments summarized in the FEIS Chapter IV strongly indicate the comments focused almost entirely on motorized travel, although the USFS acknowledge some public comments raised concerns that mountain bikes would be allowed in recommended wilderness or safety concerns between mountain bikes and horses. This summary is supported by personal communication with Glacier-Two Medicine Alliance members as well as Blackfeet tribal members who were involved in travel planning. All recall that mountain bikes were not even on their radar back then because of the infrequency of mountain bike use at that time as well as the scope of the Forest Services' analysis.³⁴ Lewis and Clark National Forest (March, 2009) Rocky Mountain Ranger District Travel Management Plan Record of Decision for Badger Two Medicine.³⁵ Ibid, p. 1636 Ibid Glacier-Two Medicine Alliance the context of the entire Revised Forest Plan, which made modifications affecting mechanized travel to at least five existing travel plans, including plans issued more recently than 2009.³⁷ 2. The Responsible Official's decision to allow continued mechanized use in the Badger Two Medicine fails to account for adverse effects to the TCD. Throughout the forest plan revision process, the Blackfeet Tribe repeatedly stated that mechanized travel is an unsuitable mode of modern transportation that would have adverse effects on the integrity of the Traditional Cultural District and asked the HLCNF to prohibit its continued use. In comments on the draft forest plan, the Blackfeet Tribal Business Council provided the following suitability language: [id] Travel in the Badger Two Medicine by horse, mule or on foot is suitable. Mechanized travel/transport in the Badger Two Medicine is an unsuitable modern development and intrusion upon the integrity of the premier importance sustaining the religious and cultural traditions of the Blackfeet Tribe. [rd] ³⁸ (emphasis added) GTMA referenced these 2018 Blackfeet comments in our comments on the draft plan when we wrote [id] GTMA fully concurs with this Blackfeet viewpoint [rd] and that [id] mountain biking, in the Badger Two Medicine TCD fails to acknowledge or promote respect for the religious and cultural significance of this wild, sacred landscape. [rd] Likewise, we recommended the Forest make a non-suitability determination for mechanized transport in the Badger Two Medicine. We continue to support the Blackfeet's position on the matter now. The HLCNF has an obligation during a [id] federal undertaking [rd] like the forest plan revision process to analyze the plan components would cause an adverse effect on the TCD, including the effects of continued mountain bike use.³⁹ The implementing regulations for the National Historic Preservation Act state: An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register.⁴⁰ From the planning documents, it is entirely unclear whether the HLCNF

completed the required NHPA Sec. 106 consultation and analysis as no documentation was provided in the FEIS, DROD, or elsewhere as required per 36 C.F.R. [sect] 800.5. When asked, the HLCNF said that they did not conduct any adverse effects analysis [ndash] either of continued bicycle use specifically or the plan components generally [ndash] for possible adverse effects to the TCD.⁴¹ This almost certainly violates the NHPA. Despite this failure, the HLCNF could have considered the suitability of mountain bikes in light of its previous adverse effects analysis related to potential oil and gas development. The then Lewis and Clark National Forest recognized:³⁷ See FEIS Appendix K, which documents ~150 miles of mechanized trail closures in areas recommended for wilderness designation.³⁸ For examples of comments submitted after 2018, see *supra* note 16 and note 17 *supra*.³⁹ See the NHPA's Criteria for Adverse Effects Analysis (36 C.F.R. 880.5)⁴⁰ 36 C.F.R. 800.141 See Attachment D Glacier-Two Medicine Alliance The TCD is associated with Blackfoot hunting, Blackfoot stories, Blackfoot power, and Blackfoot prayers/fasting/vision questing; anything that disrupts the visual natural setting, interrupts meditation, or affects the feeling of power in the area will affect the associated current traditional uses of the area by the Blackfoot. This decreased ability for the Blackfoot to use this area for traditional cultural practices would also indirectly reduce the Blackfoot's ability to identify themselves as Blackfoot. It would make the associated power of the area less suitable by decreasing its effectiveness and accessibility to traditional practitioners. Further, any negative effects to the associated power in this portion of the district would also indirectly affect the power of the entire district since it is all interconnected in the Blackfoot worldview.⁴² The Advisory Council on Historic Preservation underscored this finding in 2015 and stated the [ldquo]TCD retains integrity and is a landscape virtually unmarred by modern development.[rdquo]⁴³ Mechanized use is clearly incompatible with the values and attributes of the TCD documented by the Keeper of the National Register in 2002 and 2014 (as well as the USFS own analysis), including the significance of the place as a [ldquo]region of refuge[rdquo] for many Blackfoot tribal members. Again, it appears the HLCNF didn't even consider potential adverse effects to the integrity of the TCD in making its decision to permit continued motorized travel. The forest plan revision process, conducted in accordance with NEPA, is the most appropriate place to coordinate and integrate NHPA Section 106 duties related to consultation and the management of traditional cultural properties. As stated in NHPA regulations: Agencies should consider their section 106 responsibilities as early as possible in the NEPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner. The determination of whether an undertaking is a [ldquo]major Federal action significantly affecting the quality of the human environment,[rdquo] and therefore requires preparation of an environmental impact statement (EIS) under NEPA, should include consideration of the undertaking's likely effects on historic properties.⁴⁴ Like NEPA, the NHPA regulations require public involvement and lay out a structured process for approving the undertaking, and in assessing possible adverse effects found during preparation of the EIS [mdash] and then developing measures in the EIS to avoid, minimize, or mitigate such effects.⁴⁵ Resolution of any adverse effects likewise includes a public participation provision,⁴² Cited in Advisory Council on Historic Preservation (Sept. 21, 2015). Comments on Historic Preservation Regarding the Release From Suspension of the Permit to Drill by Solenex LLC in Lewis and Clark National Forest, Montana, p. 5-6.⁴³ *Ibid*, at 5.44 36 C.F.R. 800.8. NHPA's Section 106 regulations already call for consultation to be [ldquo]coordinated with other requirements of other statutes, as applicable, such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency specific legislation.[rdquo] 36 C.F.R. 800.2 (a)(4). The Council on Environmental Quality and the Advisory Council on Historic Preservation provides detailed guidance on how best to integrate and coordinate Section 106 and NEPA planning, including the use of [ldquo]NEPA documents to facilitate Section 106 consultation,[rdquo] and using [ldquo]Section 106 to inform the development and selection of alternatives in NEPA documents.[rdquo] COUNCIL ON ENVIRONMENTAL QUALITY, EXECUTIVE OFFICE OF THE PRESIDENT AND ADVISORY COUNCIL ON HISTORIC PRESERVATION, NEPA AND NHPA: A HANDBOOK FOR INTEGRATING NEPA AND SECTION 106 (Mar. 2013)⁴⁵ 36 C.F.R. 800.8. Glacier-Two Medicine Alliance with the agency providing [ldquo]an opportunity for members of the public to express their views on resolving adverse effects of the undertaking.[rdquo]⁴⁶ While we acknowledge the HLCNF is not statutorily bound to honor the Blackfoot's determination of adverse effects, nor GTMA's recommendations, the HLCNF must provide some basis to justify its decision not to do so.⁴⁷ However, the HLCNF doesn't identify or cite any

evidence, nor social, economic, or other factors to support its decision. 48 Given the importance of the Traditional Cultural District to the Blackfeet Nation, a significance the forest itself extols at length, its unjustified decision to allow continued mountain bike use is clearly arbitrary and capricious. Furthermore, the Reviewing Officer and HLCNF should consider the request to add a non-suitability determination for mountain bikes due to adverse effects to the TCD in light of the recently proposed Badger-Two Medicine Act. The Blackfeet Tribal Business Council passed Resolution #190-202049 in support of the proposed Badger-Two Medicine Protection Act⁵⁰ which would protect the integrity of the Traditional Cultural District. Section 5(f)(2) of the Act specifically prohibits [ldquo]The use of motorized or mechanized vehicles, except for administrative purposes, or to respond to an emergency.[rdquo] GTMA supports the proposed Act and believes the HLCNF should adhere to management objectives consistent with the language of the proposed Act.³ The decision not to address mechanized travel fails to comply with the planning rule for Areas of Tribal Importance. The 2012 Planning Rule obligates the Forest Service to give special recognition to the rights and views of federally recognized tribes like the Blackfeet Tribe: [ldquo]Consultation with federally recognized Indian Tribes and Alaska Native Corporations. The Department recognizes the Federal Government has certain trust responsibilities and a unique legal relationship with federally recognized Indian Tribes. The responsible official shall honor the government-to-government relationship between federally recognized Indian Tribes and the Federal government. The responsible official shall provide to federally recognized Indian Tribes and Alaska Native Corporations the opportunity to undertake consultation [hellip].[rdquo] 36 CFR 219.4(a)(2) (emphasis added). More specifically, the Rule requires forest plans to provide appropriate management direction for national forest areas that are particularly important to tribes, such as the Badger Two Medicine. The Rule states that plans [ldquo]must include plan components, including standards and guidelines, to provide for [hellip] [m]anagement of areas of tribal importance.[rdquo]⁵¹ According to the Forest Service Handbook, these components [ldquo]place limits or conditions on projects or activities that may adversely affect areas of tribal importance.[rdquo]⁵² As we have already established, mechanized travel [ldquo]may adversely affect[rdquo] the Badger Two Medicine TCD, an area of tribal importance in this plan. Absent a compelling, documented reason to allow mountain bikes [ndash] such as a significant benefit to the social or economic⁴⁶ 36 C.F.R. 800.6.47 36 C.F.R. 219.1448 See FSH 1909.12, 23.23a for direction to Forest on how to consider recreation[rsquo]s contribution to social, economic, and ecological sustainability when considering plan components.⁴⁹ See Attachment E⁵⁰ See Attachment F⁵¹ 36 C.F.R. 219.10(b)(1)(iii), emphasis added.⁵² FSH 1909.12, 23.23h, 2(b) Glacier-Two Medicine Alliance sustainability of the Blackfeet or local communities⁵³ -- the Forest has an obligation to honor its federal trust responsibility and limit adverse effects to the TCD by including a non-suitability component for mechanized travel in the Badger Two Medicine. The Forest provided no compelling reason to keep the area open to mechanized travel (or any reason for that matter). Nor did the public. GTMA reviewed public comments submitted on the HLCNF draft plan and was unable to find any comment letter that specifically spoke in favor of retaining mountain bike use (e.g. mechanical transport) in the Badger Two Medicine. The preponderance of evidence on the benefits vs. effects of mountain bike use in the Badger Two Medicine, along with the 2012 Planning Rule direction related both to areas of tribal importance and to recreation, clearly support closing this culturally important area to mechanized travel.⁴ Refusal to make a non-suitability determination is inconsistent with HLCNF[rsquo]s own analysis of wildland characteristics in the Badger Two Medicine area. Throughout its planning documents, the HLCNF clearly recognizes the outstanding ecological values and wild, undeveloped characteristics of the Badger Two Medicine landscape that GTMA emphasized in our comments. Most notably, the Wilderness Evaluation inventory determined that nearly 126,000 acres Badger Two Medicine, almost the entire area, exhibited substantial Wilderness character and could be eligible for inclusion in the National Wilderness Preservation System.⁵⁴ The Wilderness character of the area was further articulated when the Forest properly re-classified the entire area as primitive under the Recreation Opportunity Spectrum (ROS) as GTMA recommended in our comments, a classification commonly reserved for designated and recommended Wilderness areas.⁵⁵ Despite these findings, the HLCNF ultimately decided not to recommend the area for Wilderness designation based on direction from the Blackfeet Nation.⁵⁶ The HLCNF[rsquo]s decision respectfully, and rightly in our view, honored the Blackfeet Nation[rsquo]s request.⁵⁷ However, this decision renders the HLCNF[rsquo]s corresponding decision not to limit mountain biking in the Badger Two Medicine [mdash] despite the Blackfeet Nation[rsquo]s request they do so [mdash] all the more puzzling. Had the

HLCNF recommended the Badger Two Medicine for wilderness, which all indications are it would have had the Blackfeet not opposed it, mechanized transportation would have been prohibited in the area under the Revised Forest Plan by the following Forest-Wide suitability statement: “[Motorized and mechanized means of transportation are not suitable in recommended wilderness areas.]” (FW-REC WILD-SUIT 01) Even though Badger Two Medicine is not being recommended for wilderness designation, the agency still has authority under the 2012 Planning Rule to make a similar non-53 FSH 1909.12, 23.23a54 FEIS (2020) Appendix E, pp. 186 - 19155 FSM 2310.5; Forest Plan p. 65; We applaud the Forest Service for making this adjustment in response to our comments on the draft plan as well as for not limiting the application of primitive to Wilderness and recommended wilderness.⁵⁶ See Appendix G, p. 115, and Appendix E, p. 315. Some additional context may be helpful - the Blackfeet Nation has repeatedly opposed Wilderness-designation due to concerns the designation may restrict their ability to exercise treaty rights and because they view the designation’s Western-worldview (e.g. “[man is a visitor who does not remain]”) as incompatible with their cultural relationship to this place.⁵⁷ Glacier-Two Medicine Alliance formerly advocated for Wilderness designation for the Badger Two Medicine but like the Forest here, has changed course out of respect for the Blackfeet. Hence our comments throughout the revision process emphasized protecting the wildland qualities and specific Wilderness characteristics like solitude and naturalness (e.g. ecological processes), but stop short of asking the Forest to recommend the area for Wilderness designation. Glacier-Two Medicine Alliance suitability determination for this area because mechanized travel is “[not compatible with desired conditions for those lands.]”⁵⁸ The Forest Service Manual’s guidance on primitive ROS settings reinforces this discretion: “[Many primitive settings coincide with designated wilderness areas in which mechanized equipment is not present. Additional primitive settings may also occur outside of wilderness areas. Mechanized travel and motorized equipment may occur in nonwilderness primitive settings.]”⁵⁹ The key word here is “[may].” The HLCNF clearly has the discretion to prohibit mountain biking in the Badger Two Medicine on a site-specific basis even though the area is neither designated nor recommended as wilderness. As discussed further in Objection #5 below, the HLCNF failed to recognize its discretion when it wrongly deferred to the National Recreation Opportunity Spectrum Inventory Mapping Protocol as establishing national direction that precluded it from closing the area to mechanized travel. The HLCNF should exercise its authority now and make a non-suitability determination.⁵ The forest plan revision is the proper time to make this suitability determination. The Responsible Official’s decision to defer to the current travel management plan rather than decide the suitability of mechanized travel in the Badger Two Medicine potentially violates the National Forest Management Act and its implementing regulations which clearly states that forest plans establish the overarching framework to guide resource management on the forest.⁶⁰ In turn, resource and site-specific plans, like travel management plans, must be consistent with the forest plan, or in Forest Service lingo, tier off the forest plan.⁶¹ To defer to a travel management plan promulgated under the old forest plan is to inappropriately invert this legally established relationship. Even if the HLCNF was in compliance when it chose to set aside travel management determinations as part of the forest plan revision process—which it was not—it still should take up the question. According to the Forest Service Handbook’s planning directives, which uses warrant suitability determinations “[may arise from issues raised in public participation]” (FSH 1909.12, 22.15). As documented above, this is clearly the case here. Mountain bike use has exploded on national forest lands in Montana in recent years. This has raised both the public and the Blackfeet Tribe’s awareness and concern about mountain bike suitability to levels far beyond what it was when the travel planning process was initiated in 2005 or in 2015 when Supervisor Avey indicated the forest plan revision process would not examine travel management. While mountain bike use in the Badger-Two Medicine remains relatively low at the moment, its increasing popularity and changing technology both suggest that allowing its continuation in the Badger-Two Medicine will ultimately result in unacceptable impacts to the integrity of the TCD. The HLCNF should get ahead of this foreseeable outcome, honor Blackfeet requests, and protect the integrity of the TCD by making a mechanized transport suitability determination in the Revised Forest Plan. The suggested remedy will also facilitate the HLCNF 58 36 C.F.R. 219.7(e)(1)(v) 59 FSM 2310.560 36 C.F.R. 219.2(b)(1) 61 16 U.S.C. 1604(i) 62 See Attachment B Glacier-Two Medicine Alliance required evaluation of the current travel management plan for consistency with the Revised Forest Plan and its desired conditions. 63 Remedy: 1. The HLCNF should either immediately produce documentation of its adverse effects analysis and determinations, or complete its

analysis for how plan components for the Badger Two Medicine as well as mechanized travel affect the TCD and document its determination prior to signing the final Record of Decision for the Revised Forest Plan.² The HLCNF should subsequently make a consecutive plan and project decision⁶⁴ to address mechanized transport/travel as follows:

- a. Add a non-suitability component to the Revised Forest Plan that reads: "Within the entire Badger Two Medicine Area, mechanized recreation or travel is not suitable except on FS roads and routes open to summer motorized travel under the 2009 Travel Management Plan. Exceptions may be made for administrative purpose or in emergencies involving public health and safety as determined on a case by case basis."
- b. In concurrence with the final Record of Decision, issue a temporary closure order (see Forest Service Handbook 1920, 21.8) that reads: "The possession or use of a bicycle or other mechanized travel/transport (e.g. drones) within the Badger Two Medicine area of the Helena-Lewis and Clark National Forest is prohibited except on forest roads open to highway legal vehicles, developed recreation areas, and trailheads (36 CFR 261.55(c)). The order should stay in effect until travel plan amendments are completed as recommended next."
- c. Provide a written commitment in the final Record of Decision that within 1 year the HLCNF will initiate a site-specific travel plan amendment process for the Badger Two Medicine to ensure travel plan consistency with the land management plan's suitability direction.

⁶⁵ **Objection #4** [ndash] Monitoring questions and indicators for Badger Two Medicine

In the event the Forest Service does not remedy Objection #3, as requested, then GTMA asks the Forest Service to adjust their monitoring questions and indicators for the Badger Two Medicine that were added to the final plan after the last comment period closed. Currently, Appendix B Table 17 lists only one monitoring question and one indicator for the Badger Two Medicine. However, compare this to the monitoring components for the Grandview Recreation Area (GVRA) [ndash] another site on the forest classified as primitive under the ROS yet left open to mountain bikes. The forest proposed two monitoring questions and two indicators for the GVRA. The monitoring components for GVRA should be replicated for the Badger Two Medicine. The planning rule clearly explains the purpose of monitoring components: "Monitoring questions and associated indicators must be designed to inform the management of resources on the Revised Forest Plan area, including by testing relevant assumptions, tracking relevant changes, and measuring management effectiveness and" 36 C.F.R. 219.15(e)

⁶⁴ See FSH 1909.12, Chapter 20, Sec. 21.8 for more explanation

⁶⁵ Flathead National Forest (Dec. 2018) Record of Decision for the Land Management Plan, p. 21

Glacier-Two Medicine Alliance progress toward achieving or maintaining the Revised Forest Plan's desired conditions or objectives. (36 CFR 219.12). The modifications suggested in the remedy will allow the USFS to better track changes in the social and ecological conditions that contribute to the primitive ROS desired conditions. The current monitoring question and indicator only tracks social conditions. Moreover, given the nearly non-existent mountain bike use in the Badger Two Medicine at present, this recommended change will allow the USFS to accumulate important baseline data by which the agency can evaluate management effectiveness or use to inform future decisions. Similarly, the current indicator for the Badger Two Medicine should be reworded. The phrase "core area" is unclear. Nowhere does the forest plan identify a "core area" for the Badger Two Medicine. The whole area should be monitored, not just some undefined portion of it. Furthermore, as in the Grandview Recreation Area, the monitoring indicator should measure both social conflicts [ndash] to account for impacts on solitude [ndash] and resource damage. It should also monitor explicitly for conflicts between mountain bikes and wildlife in order to account for potential adverse effects on secure core habitat for grizzly bears. The suggested changes will improve monitoring of potential mountain bike impacts on the scenic integrity, natural vegetation, and ecological integrity that are hall marks of primitive settings. Suggested wording is provided in the remedy.

Remedy:

- ? Add a monitoring question under MON-BTM-01: "Are unauthorized trails created by mechanical means of transportation (mountain bike) present within the Badger Two Medicine?"
- ? Add an indicator under MON-BTM-01: "Number, mileage and extent of unauthorized trails created for mountain bike trails within the Badger Two Medicine."
- ? Adjust the current indicator under MON-BTM-01 to read: "Number and kind of social conflict incidents, wildlife conflict incidents, and resource damage incidents reported in the Badger Two Medicine area."

Objections to Forest-Wide Issues

Objection #5 [ndash] Mountain biking should not be identified as universally suitable in primitive Recreation Opportunity Spectrum settings

As reflected in our comments on the draft plan, the HLCNF was correct to classify certain "large, wild, and predominantly unmodified landscapes" like the Badger Two Medicine as primitive even though such areas may not be recommended for wilderness designation. However, the HLCNF erred when it determined that mountain bikes

would automatically be suitable in primitive settings outside of designated or recommended Wilderness. Such determination should be made on a site-specific, case-by-case basis rather than as a forest-wide plan component. The relative plan component reads: Mechanized means of transportation and mechanized equipment are suitable on designated trails in desired primitive settings, unless prohibited by law, forest plan direction, or forest closure order. (FW-ROS-SUIT-02)⁶⁶ FSM 2310 Glacier-Two Medicine Alliance As noted previously, when setting this and other ROS plan components, the HLCNF relied on the National Recreation Opportunity Spectrum Mapping Protocol⁶⁷ which [Idquo] provides guidance for not only how ROS settings are mapped but also what activities are appropriate in each ROS setting. [rdquo]⁶⁸ The HLCNF further explains it included this plan component because [Idquo] The 2020 Forest Plan would follow national direction and would allow all forms of nonmotorized recreation uses within Primitive ROS settings, including bicycles, unless specifically prohibited by Congressional law or forest closure order. [rdquo]⁶⁹ However, the protocol the HLCNF cites as establishing a [Idquo] national direction [rdquo] to which it must adhere is not intended to set binding policy direction. Rather, [Idquo] this protocol focuses on providing a product which informs existing conditions for the forest plan assessment phase of the three-phase planning framework, [rdquo] and is only to be [Idquo] used as a starting point for integrating with other resource values and deriving desired ROS settings. [rdquo]⁷⁰ Nowhere in the protocol document does the Forest Service provide national policy direction that requires the HLCNF to automatically classify mountain biking as a suitable use within primitive ROS areas. Even assuming for a minute that the protocol does set a national policy direction (which it does not), it is not clear that the mapping protocol suggests allowing mountain bikes in primitive settings outside of wilderness as the national direction. The protocol explicitly mentions mountain bikes as a type of use in its description of semi-primitive nonmotorized settings.⁷¹ However, for primitive settings, the protocol states human locomotion simply as: [Idquo] Travel on foot and horse, no motorized, no mechanized travel within designated wilderness. [rdquo]⁷² If the protocol intended to set a national direction where mechanized travel was characteristic of primitive settings outside of wilderness, it could not have done so in a more opaque manner. But again, that was not its intent. And even if it was, this protocol has no binding legal authority and cannot supersede or limit the direction of the 2012 Planning Rule on suitability determinations which clearly allows the HLCNF to reach a different conclusion.⁷³ Nor can the protocol supersede the direction provided for primitive settings in the Forest Service Manual. The FSM is clear that in primitive settings [Idquo] motorized travel does not occur [rdquo] whereas [Idquo] mechanized travel and motorized equipment may occur in non-wilderness primitive settings [rdquo] (emphasis added). Again, [Idquo] may [rdquo] is the operative word here, meaning such action is not required. Thus the HLCNF erred when it claimed in the FEIS it had to follow the mapping protocol and declare mechanized use suitable in primitive settings outside of designated or recommended wilderness, including in the Badger Two Medicine.⁷⁴ The HLCNF can and should make this⁶⁷ Nicole R. Hill. National Recreation Opportunity Spectrum (ROS) Inventory Mapping Protocol, Enterprise Program, Washington Office, USDA Forest Service, August 2019 (1st revision)⁶⁸ FEIS, Chap. 3, Vol. 2, p. 5, emphasis added⁶⁹ FEIS, Chapter 3, Part 2, p. 5; the Forest repeats this claim in Appendix G when it states [Idquo] In accordance with this national protocol, mechanized means of transportation are suitable in all ROS settings, unless those areas are specifically closed due to legislative action, such as congressionally designated wilderness, or by closure order at the Forest or District levels [rdquo] (p. 96).⁷⁰ Nicole R. Hill. National Recreation Opportunity Spectrum (ROS) Inventory Mapping Protocol, Enterprise Program, Washington Office, USDA Forest Service, August 2019 (1st revision), p. 1, emphasis added.⁷¹ Ibid, p. 52. In describing the six different settings of the Recreation Opportunity Spectrum, the Revised Forest Plan clearly describes bikes as a characteristic presence in semi-primitive nonmotorized settings, but makes no mention of such use in primitive settings (p. 230).⁷² Ibid, p. 51, emphasis added.⁷³ 36 C.F.R. (219.7(e)(1)(v))⁷⁴ FW-ROS-SUIT-02 Glacier-Two Medicine Alliance determination on a place-by-place basis. Ironically, the HLCNF acknowledges as much in the suitability components for ROS, which state that [Idquo] forest plan direction, or forest closure order [rdquo] can be used to limit mechanized uses in primitive ROS outside of wilderness.⁷⁵ The Badger Two Medicine is one of the places where forest plan direction should determine the suitability of mountain biking in a primitive ROS setting. Remedy: The discussion of the ROS and travel planning in the DROD and FEIS should be corrected to clarify that neither national direction nor past HLCNF travel planning decisions compel a determination that mountain biking is a suitable use in all primitive ROS settings outside of designated wilderness. Remove FW-ROS-SUIT-02 from the final plan. As in Objection #3, the Revised Forest Plan should clearly identify that

mechanized transport is non-suitable in the Badger Two Medicine area. Except for the Badger Two Medicine, ALL primitive ROS settings not recommended for wilderness should neither be identified as suitable nor not suitable for mechanized transport. Rather, the Revised Forest Plan and ROD should commit the Forest Service to undertake separate planning processes within three years to decide whether a particular area should be open or closed to mountain biking.

Objection #6 [ndash] The HLCNF recommended too little Wilderness in Alt. F, which fails to provide sufficient secure habitat to promote connectivity of grizzly bears. In our comments on the draft plan and DEIS, GTMA encouraged the HLCNF to select Alternative D because it identified the greatest number of areas [mdash] sixteen [mdash] and total acres [mdash] 474,589 [mdash] that would be recommended as wilderness. Selecting Alternative D was critical to protect the wilderness characteristics identified in the Wilderness inventory and evaluation. Furthermore, GTMA urged the selection of Alternative D because the number and size of the recommended wilderness areas identified in Alternative D in the island ranges south and east of Helena are necessary to provide grizzly bears secure habitat in an area of the HLC National Forest that does not otherwise contain ample suitable or low-conflict habitat. The protections provided by recommended wilderness would help to limit human-bear conflicts and to facilitate connectivity via the dispersal of bears between the Northern Continental Divide Ecosystem (NCDE) and Greater Yellowstone Ecosystem necessary to recover the species. The FEIS notes the importance of RWAs to achieving connectivity: The combined effect of designated wilderness, WSAs, IRAs, and RWAs would be to maintain those acreages as already secure habitat and increase potential long-term security in areas designated as RWAs. (FEIS 3-341, emphasis added) The Forest Service is required under the 2012 Planning Rule (and other authorities) to promote the recovery of threatened and endangered species like grizzly bears. Recommended wilderness [ndash] with its management direction to maintain wilderness character [ndash] is the best way to ensure secure habitat for grizzly bears. It is well documented in the FEIS and scientific literature that roads and motorized access are one of the leading causes of grizzly bear mortality by humans as well as an obstacle to their movement. Greater recommended wilderness would reduce mortality and promote connectivity.

75 FW-ROS-SUIT-02 Glacier-Two Medicine Alliance The recommendations for wilderness identified in Alt. D of the Draft Plan are further critical to promoting connectivity because the Revised Forest Plan lacks components that would protect grizzly bear habitat or prevent conflicts between grizzly bears, livestock, and people in the Big Belts, Divide, Elkhorns, Little Belts, Crazies, Snowies, Castles, or Highwoods Geographic Areas (these correspond with Zone 2 and Zone 3 in the NCDE Grizzly Bear Conservation Strategy/Habitat Management Direction that was incorporated into the plan). The plan does not appear to even include a food/attractant storage order that applies to national forestlands in Zone 3 as the plan components related to food storage only apply to the Primary Conservation Area, Zone 1 and Zone 2.

76 However, despite the obligation to promote connectivity, the HLCNF chose instead to recommend only seven areas totaling 153,325 acres as wilderness. This is a whopping 46% less acres than in the Proposed Action (2016), and a stark 33% reduction from Alternatives B & C in the DEIS [ndash] which were developed to provide the greatest mix of timber production, motorized recreation, nonmotorized recreation and recommended wilderness preservation. Particularly unsettling, the HLCNF did away with almost all recommended wilderness designations in Zone 2 and Zone 3, the Geographic Areas of the forest where such designations are most critical to dispersing grizzly bears. This change includes either total elimination of all recommended wilderness areas or steep reductions in the number and acreage in several plan Geographic Areas, including the Big Belts, Little Belts, Castles, Crazies, Snowies, and Divide. Expanding the number and size of recommended wilderness areas is critical to protect wilderness characteristics currently present on the forest, to provide opportunities for quiet recreation, and to protect wildlife habitat [ndash] especially secure habitat for grizzly bears.

Remedy: The HLCNF should include the entire forest in its food/attractant storage order (i.e. add Zone 3 to the current NCDE PCAZ122 Plan Components). GTMA endorses the recommended wilderness designations in the objection filed by the Montana Wilderness Association. GTMA endorses the additional recommended wilderness designations in the objection filed by the Sierra Club.

Request to be an Interested Party In addition to our objections identified in this letter, GTMA would like to be included as an [ldquo]Interested Party[rdquo] to any objections that affect the Badger Two Medicine special emphasis area whatsoever. At the forest wide scale, GTMA requests to be included as an [ldquo]Interested Party[rdquo] to any objection pertaining to Wilderness [mdash] either recommendations, Study Areas, or management [mdash] to grizzly bears, or to Wild and Scenic eligibility. In both cases, objections could be forest-wide, geographic area, special emphasis area or specific plan components that affect the

resources of interest. Closing Remarks In closing, GTMA thanks the forest plan revision team for its hard work on this process. The team should be commended for its willingness throughout this years-long process to always⁷⁶ see PCAZ1Z2-NCDE-STD 01 in the Revised Forest Plan Glacier-Two Medicine Alliance answer our questions or engage in conversation on aspects of the Revised Forest Plan in a friendly and professional manner. Thank you for the opportunity to submit this objection. Please let me know if you have any questions or need additional information. GTMA looks forward to working with you to resolve our objections and produce a truly-sound land management plan for the publicly-important forestlands of the Helena-Lewis and Clark National Forest. Thank you for your time.