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Organization:

Title:

Comments: See attached PDF.

Specific Statements of issues and/or parts of the plan revision to which the objection applies. Use concise statements explaining the objection and suggesting how the proposed plan should be improved:

1. 2020 Land Management Plan, Page 79, sentence [ldquo]Management activities shall follow direction found in the 2001 Roadless Rule (36 CFR 294 Subpart B, published at 66 Fed Reg. 3244-3273).[rdquo]? The reasons for this objection are:The sentence misstates the guidance under which the organization operates.? Proposed Solution:Revise sentence to read, [ldquo]Management activities shall follow direction found in the 2001 Roadless Rule (36 CFR 294 Subpart B, published at 66 Fed Reg. 3244-3273) and subsequent guidance provided through litigation. See page Roadless Rule Litigation Page.[rdquo]

2. 2020 Land Management Plan, Page 82, section Suitability (FW-IRA-SUIT) is missing a suitability statement.? The reasons for this objection are:Clarity. FW-IRA-SUIT describes some, but not all, suitable activities. A central statement is missing. A principal suitable activity is preserving IRAs as the inventory of wildlands and lands eligible for Wilderness designation.? Proposed Solution:Add a fourth suitability, [ldquo]04 Inventoried roadless areas are maintained as an inventory of wildlands and lands eligible for potential Wilderness designation.[rdquo]

3. 2020 Land Management Plan, Page 156, the section [ldquo]Recommended Wilderness - There are no recommended wilderness areas in the Elkhorns GA.[rdquo] is misleading.? The reasons for this objection are:Clarity. The Elkhorn WMU is a unique, but unprotected designation under federal law. Effective Forest Service management suffers because of the WMU[rsquo]s lack of federal definition and statutory requirements.? Proposed Solution:Replace [ldquo]There are no recommended wilderness areas in the Elkhorns GA.[rdquo] with [ldquo]Although, there are no recommended wilderness areas in the Elkhorns GA, the wilderness characteristics of the Elkhorns supports the Wildlife Management Unit[rsquo]s purpose. The designation of the Elkhorn as a Wildlife Management Unit (WMU) is a unique, but an unprotected designation under federal law.[rdquo]