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Organization:

Title:

Comments: Bill Avey, Helena-Lewis and Clark Forest Supervisor

Re: Helena-Lewis and Clark National Forest 2020 Land Management Plan, Draft Record of Decision, and Final Environmental Impact Statement

Dear Forest Supervisor Avey,

Thank you for this opportunity to comment on the Helena-Lewis and Clark Forest 2020 Land Management Plan. My family and I have a FS lease cabin off of the Benchmark Road, and we care deeply about the Rocky Mountain Front and surrounding areas.

Regarding the Badger-Two Medicine section of the Draft Record of Decision and Final Environmental Impact Statement:

1. I object to the removal of Standard 02 which was included in the June 2018 draft. This Standard would provide mandatory protections for the Badger-Two Medicine Traditional Cultural District, and no explanation was provided for its removal. The remedy would be to reinstate Standard 02 in the Final Plan.

2. I object to the decision to allow mechanized use, including mountain bikes, in the Badger-Two Medicine. There is currently minimal mountain bike use in the area, and the Blackfeet Nation has requested that the area be closed to mechanized use on the grounds that such use is not compatible with Blackfeet cultural uses and traditions. The remedy would be to add a plan component that states, "Mechanized travel/transport is not suitable in the Badger-Two Medicine."

Regarding Arrastra Creek:

I object to the exclusion of Arrastra Creek as Recommended Wilderness. This area would be an important extension to the Scapegoat Wilderness. The remedy would be to add Arrastra Creek as Recommended Wilderness, with the same boundaries as the Upper Blackfoot Proposal.

Regarding the Big Snowies Wilderness Study Area:

This area well deserves Wilderness designation, and it's great that the Draft Record recommends such protection for a significant part of the Big Snowies. However, I object to the boundaries for the Recommended Wilderness in the draft, which omit important hiking trails and natural areas. The remedy would be to alter the boundaries to include the Neil Creek Trail (#654), Blake Creek Trail (#655), Timber Creek Trail (#676), Crystal Cascades trail (#445 and 445a), and the trail from Crystal Lake to the Ice Caves (#493).

Regarding the Primitive Recreation Opportunity Spectrum:

I am concerned that the definition of "primitive" has been degraded to include mechanized use as a suitable activity outside of Wilderness and Recommended Wilderness areas. In the past, "primitive" areas have been restricted to foot and stock use and managed to retain their wild and remote values. I object to the Draft Record's classing mechanized use as "suitable" in Primitive Areas outside of Wilderness and Recommended Wilderness.

The remedy would be to remove the (FW-ROS-SUIT-02) from the Primitive suitability section for areas outside of

recommended wilderness, and that site specific decision for primitive ROS means of travel outside of recommended wilderness should be analyzed within three years.

Regarding Wilderness Study Areas:

I object that the language in the Draft Record fails to provide adequate guidance for the management of WSAs and that required statutory language is missing from the Desired Conditions. The remedies should be as follows:

1. Change Desired Condition 02 to read: "Wilderness study areas primarily offer opportunities for solitude; primitive and unconfined recreation."

2. Change Standard section to read:

"01 Within wilderness study areas, maintain each area's wilderness character as it existed in 1977, until the area is either designated as a wilderness area or removed from the Study Act.

02 Within wilderness study areas, maintain each area's potential for designation within the National Wilderness Preservation System, until the area is either designated as a wilderness area or removed from the Study Act.

03 Activities that diminish the historic (1977) wilderness character or potential for future wilderness designation are not allowed. New uses, permits or activities must be analyzed to determine effects on wilderness character and potential before they can be allowed."

3. Change Suitability by deleting the Current Section 08 and replacing it with the following:

"08 Wilderness study areas are not suitable for federal mineral leasing or extraction of saleable minerals.

09 Wilderness study areas are not suitable for recreational and commercial drones."

Thank you for your consideration.