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Comments: Objections to the Helena-Lewis and Clark National Forest 2020 Land Management Plan

Forest Supervisor Bill Avey

In my comments on the Helena-Lewis and Clark Plan, I asked that you recommend all qualifying areas for wilderness protection because the ever-increasing population is making wild, unspoiled land more valuable all the time. However, your decision fails to do this.

In particular, I object to:

1. Recommended wilderness boundaries in the Big Snowy Mountains. Remedy: The Neil Creek Trail(#654), Blake Creek Trail (#655), and Timber Creek trail (#676) should be included in 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 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 complete on trail #490, west of West Peak, and on trail #483 (Dry Pole Creek).
2. Continued mechanized travel in the Badger-Two Medicine. Remedy: Honor Blackfeet wishes and designate the Badger-Two Medicine unsuitable for recreational mechanized use.
3. 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.
4. The exclusion of the Middle Fork Judith as recommended Wilderness. Remedy: During the revision process, hundreds of people took the time to favorably comment in support of protecting this important Wilderness Study Area (WSA). The FS should adopt the boundaries in Alternative D, which includes 62,452 acres of RW and does not impact existing motorized use.
5. An ROS of Semi-Primitive Non-Motorized for the Loco Mountain area. Remedy: The Loco Mountain IRA should be a Primitive ROS. A Primitive ROS wouldn't affect any current uses and would also acknowledge the important wildlife values of this area.
6. No protection for the wild heart of the Elkhorns, fails to keep the Elkhorns free of oil and gas leasing, and guts the foundational WMU principle of putting wildlife before development. Remedy: Adopt Alt C (with boundaries of DEIS) to keep the remote "primitive" core of the Elkhorns wild and free of wheels and motors. Under this solution, 29% of the Elkhorns would remain wild and managed for traditional travel by foot and stock, and 71% of the WMU would include trails and roads open to mountain bike travel. Alt C (of the DEIS) best preserves the wilderness character of this largest roadless area on the old Helena National Forest. Also prohibit oil and gas development.
7. Classifying mechanized use as [ldquo]suitable[rdquo] 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 and that site specific decision for primitive ROS means of travel outside of recommended wilderness should be analyzed within three years.
8. The Forest Plan not adequately guiding the management of WSAs into the future and statutory language is missing from the Desired Conditions. Remedy: Change Desired Condition 02 to read: [ldquo]Wilderness study areas primarily offer opportunities for solitude; primitive and unconfined recreation.[rdquo] Change Standard section to read: Within wilderness study areas, maintain each area[rsquo]s wilderness character as it existed in 1977, until the area is either designated as a wilderness area or removed from the Study Act. Within wilderness study areas, maintain each area[rsquo]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. 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. Wilderness study areas are not suitable for federal mineral leasing or extraction of saleable minerals. Wilderness study areas are not suitable for recreational and commercial drones.