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Objections to the Helena-Lewis & Clark National Forest 2020 Revised Land Management Plan
Attention: Regional Forester Leanne Marten

Objection #1: The Number and Size of the Recommended Wilderness Areas
I previously commented on the importance of Wilderness for preservation of habitat and watershed value, the opportunity for quiet solitude, and the preservation of these values for our children and grandchildren. Past allowance of mountain bike use within designated RWA's should not form the basis for excluding acres from RWA designation in the new 2020 Plan. Additionally, the important contribution RWA's may make in providing safe connectivity for grizzly bear populations should not be discounted.
Remedies:
A.Big Snowies. RWA boundaries for the Big Snowies should be enlarged to include the areas accessed by Neil Creek Trail #654, Blake Creek Trail #655, Timber Creek Trail #676 and the Crystal Cascades Trail #445 and #445a, with the boundary aligned with the existing snowmobile area.
B.Arrastra Creek. Arrastra Creek should be an RWA with the same boundaries as shown in the Upper Blackfoot Proposal.
C.Middle Fork Judith. Middle Fork of the Judith should be an RWA with the boundaries shown in Alternative D.

Objection #2: The loss of Standard 02 for the Badger-Two Medicine special emphasis area (RM-BTM-STD 02) in the Final Plan.

This objection is the result of a new condition (actually an omission) in the 2020 Revised Plan and therefore not subject to the requirement that I must have previously commented on it in order to submit an objection. This standard was removed from the Plan without explanation.

Standard 02 places a mandatory constraint on future projects in the Badger-Two Medicine. This constraint is necessary to prevent adverse effects to the TCD. Currently under Sec. 106 of the National Historic Preservation Act, the Forest must analyze adverse effects. But this obligation is merely procedural. The Forest does not have to mitigate effects of a proposed action if it can provide a rationale. Standard 02 is different. It requires the Forest to prevent adverse effects, not just consider them, when designing and implementing management actions.

Remedy: Re-insert Standard 02 (RM-BTM-STD 02) from the draft forest plan verbatim into the final Revised Forest Plan.

Thank you for the opportunity to object to the Revised 2020 Land Management Plan.