

Data Submitted (UTC 11): 7/19/2020 8:13:31 PM

First name: Don

Last name: Gordon

Organization:

Title:

Comments:

Helena Lewis and Clark National Forest Plan Objection Attention: Objection Review Officer USDA Forest Service, Objection Reviewing Officer Northern Region 26 Fort Missoula Road Missoula, MT 59804

I object to the Helena Lewis and Clark National Forest Plan for the following reasons: 1) I provided comments to the HLCNF in regards to the continued loss of access and am disappointed the HLCNF Plan provided false information by their statement in Chapter 3 of the FEIS. The following statement under: 3.17 Recreation Opportunities 3.17.1 Introduction To address both the challenges and opportunities in recreation management, the FS strives to provide a set of recreation settings, opportunities, and benefits that are sustainable over time. Sustainable recreation is defined as the set of recreation settings and opportunities on the NF that are ecologically, economically, and socially sustainable for present and future generations. Issues: There were no issues raised for recreation opportunities during the scoping period for the proposed action and/or comment period on the DEIS. Many comments, including mine, to the Forest Service during the scoping and development of the DEIS raised the need for additional recreation opportunities. Concerns over past closures were communicated to the Forest Service during the scoping and comment periods. Past actions of closures to access in Montana has even received attention from our state legislature. The 2015 Legislature passed HJ 13 to assess the loss of access to our public lands in Montana. The final report can be found at <https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf>. The results of this study showed an astounding 22,000 miles of roads closed by the Forest Service in Montana since 1995, a short 20-year period. The closures of roads and access have caused concern throughout Montana and numerous comments were made to the HLCNF during the scoping and drafting period of the DEIS. The statement contained under "issues" 3.17 "Recreation Opportunities" is false, and the Forest Service has ignored public comments they received raising this issue. I request the Forest Service remand the decision and address the numerous public comments they received about the lack of, and loss of recreation opportunities in the HLCNF. 2) The Forest Service failed to comply with the President's Council on Environmental Quality by omitting a cumulative impact analysis in the HLCNF FEIS. The CEQ requires the Forest Service to take a hard look at the cumulative impacts of their actions and the HLCNF has failed to include this information. I request the Forest Service complete a comprehensive and programmatic impact analysis of past, current, and proposed actions that have affected access to and on the HLCNF. One forest closure may not be significant but multiple closures on multiple forests must be looked at in a comprehensive analysis to ascertain a clear picture of impacts. These impacts include social, economic, historical use, and cultural needs of the population. Cumulative impacts could also affect environmental conditions such as fuel load increases, poor wildlife habitat in overgrown forests, loss of water retention due to increased transpiration, and excessive tree numbers per acre. Loss of ground water recharge and the cumulative effect this loss has on municipal water delivery, irrigation, and vegetation. The HLCNF has failed to include actions of other neighboring forests in their analysis of impacts. The HLCNF is not an island but rather a part of a bigger landscape of multiple forests. An action by the HLCNF has a direct and significant effect on other forests managed by the Forest Service. The HLCNF has failed to address the cumulative impacts of their actions and how it affects management and access in other forests such as the Custer Gallatin, Lolo, and Beaverhead Deerlodge. The HLCNF also includes 17 counties with jurisdiction and land within the project area. The FEIS summary states on page 3: Project or activity planning (3) resolving inconsistency, And below is the required law the Forest Service must follow in reviewing local Resource Plans and Growth Policies. 40 CFR 1506.2 (USFS 25.2) - Elimination of Duplication With State and Local Procedures. (d) To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law. (40 CFR 1506.2) On page 6 of the HLCNF FEIS the following statements are made: Government agency involvement

The 2012 Planning Rule (36 CFR § 219.4(b)) requires the review of the planning and land use policies of other Federal agencies, state and local governments, and Indian tribes. As part of that outreach effort, a number of discussions with representatives from those agencies were initiated, and ongoing dialogue continues.....

While certain components may not be fully consistent, the HLC NF will continue to work with these entities to address the impacts and benefits from forest management. Under 40 CFR 1506.2 the Forest Service is required to describe inconsistencies with local plans and describe how the Forest Service will reconcile any inconsistency. The HLCNF failed to include discussion of the inconsistencies or a description of how the agency would reconcile their proposed action with the local plans. Their statement of: "While certain components may not be fully consistent, the HLC NF will continue to work with these entities to address the impacts and benefits from forest management." is insufficient. The Forest Service has failed to comply with the requirements of 40 CFR 1506.2. I request the Forest Service remand the decision and supplement their document with a complete list of inconsistencies identified in the local plans of the 17 counties and how they will reconcile these inconsistencies.