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Organization:

Title:

Comments: Big Snowies Wilderness Study Area (WSA)

? Issue: Thank you for recommending Wilderness (RW) for a large portion of the Big Snowies WSA. This area is important for water quality, wildlife, and solitude. However, the western boundary, as proposed, is not sufficient to protect the wild character and existing traditional uses in this remarkable area. The trails on the south slope of the Big Snowies, and one of the trails from Crystal Lake to the Ice Caves, are steep foot and stock trails that should be included in the recommended Wilderness. Other uses such as mountain biking in this area is minimal to non-existent. West peak also provides a better physical boundary.

? Objection: I object to the boundaries for the recommended Wilderness in the Draft Record of Decision (DROD).

? 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).

The Badger-Two Medicine

? Issue: The Badger-Two Medicine is sacred to the Blackfeet people, who have relied on the Badger-Two Medicine since time immemorial for their cultural practices. The Blackfeet have stated that mechanized uses are not compatible with the cultural values of the Badger-Two Medicine, a place of creation and cultural learning and healing for the Blackfeet people. While the travel plan for the Rocky Mountain Ranger district was completed, it did not analyze the use of mechanized transport on trails in the Badger.

? Objection: I object to continuing mechanized use in the Badger-Two Medicine.

? Remedy: I ask you to honor Blackfeet wishes and designate the Badger-Two Medicine unsuitable for recreational mechanized use.

Arrastra Creek

? Issue: Arrastra Creek was not included as Recommended Wilderness. This area is adjacent to the Scapegoat Wilderness and is included in the Upper Blackfoot Proposal. Arrastra Creek is an area where solitude and quiet trails are worthy of being included in the Wilderness Preservation system.

? Objection: I object to 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.

Middle Fork Judith

? Issue: Since designated as a Wilderness Study Area in 1977, the Middle Fork Judith has only become more wild. The 2007 travel plan excluded motorized uses on many trails in the WSA and the land has since healed from abuses that occurred during that time. That trend will only continue with the restoration currently underway in the Middle Fork. The presence of roads and private inholdings adjacent to the area is not an adequate reason to exclude the MFJ from recommended Wilderness. When traveling any distance from these areas, the presence of motorized use and inholdings is not evident and the area is truly wild.

? Objection: I object to 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.

North Crazy Mountains

? Issue: The Loco Mountain Inventoried Roadless Area (IRA) is assigned a Semi-Primitive Non-Motorized Recreation Opportunity Spectrum (ROS) in the forest plan. The area is remote with no motorized travel routes and offers a high probability of solitude. The area is also important for backcountry hunting, hiking, fishing and horseback riding. The Loco Mountain area includes secure elk habitat and elk winter range. It also includes potential wolverine, Canada lynx, and goshawk nesting habitat as well.

? Objection: I object to 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.

The Elkhorns Wildlife Management Unit (WMU)

? Issue: The Elkhorn WMU provides an island of refuge for many species including deer, elk, wolverines, and possibly grizzly bears, and provides a corridor for connectivity.

? Objection: The DROD does not protect 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.

! Insert a standard stating: "The Elkhorns WMU is unsuitable for oil and gas leasing and exploration."

! Restore the wildlife compatibility requirement by amending the wildlife guideline to change the language as follows (changes highlighted).

"Maintenance, enhancement, and restoration of wildlife habitats should be the priority for resource management in the Elkhorns Wildlife Management Unit. Management activities and permitted uses are compatible with wildlife values and habitats.

Primitive Recreation Opportunity Spectrum (ROS)

? Issue: We are concerned about the erosion of the definition of primitive and the sweeping decision that mechanized use is "suitable" in primitive ROS areas outside of Wilderness and recommended Wilderness. Historically, primitive areas have been retained for traditional foot and stock use and managed to retain their large, remote, wild and predominantly unmodified values.

? Objection: I object to the Forest Service classing mechanized use as "suitable" 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

Wilderness Study Areas (WSAs)

? Issue: WSAs were designated in 1977 and the Forest Service is mandated to maintain the wilderness character of these areas and their potential for designation. The language in the draft does not adequately convey the desired conditions, standards, or suitability language that would maintain the Wilderness character as they existed in 1977. The Forest Service must use statute language and legal precedent when managing WSAs.

? Objections: The language in the Forest Plan does not adequately guide the management of WSAs into the future and statutory language is missing from the Desired Conditions.

? Remedy:

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

! 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.

? Change Suitability to read as follows

! Delete Current Section 08.

! 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.