

Data Submitted (UTC 11): 7/13/2020 6:00:00 AM

First name: Thomas

Last name: Stark

Organization:

Title:

Comments: See attached.

I object to the Helena Lewis and Clark National Forest Plan for the following reasons:

The following objection relates to issues that arose after all the formal comment periods closed.

36 CFR 219.53 allows an individual to object to a plan based on an issue, or issues, "that arose after the opportunities for formal comment."

219.53 Who may file an objection.

(a) Individuals and entities who have submitted substantive formal comments related to a plan, plan amendment, or plan revision during the opportunities for public comment as provided in subpart A during the planning process for that decision may file an objection. Objections must be based on previously submitted substantive formal comments attributed to the objector unless the objection concerns an issue that arose after the opportunities for formal comment. The burden is on the objector to demonstrate compliance with requirements for objection. Objections that do not meet the requirements of this paragraph may not be accepted; however, objections not accepted must be documented in the planning record.

Objection 1:

The Forest Service has violated 36 CFR 219.52 in not providing an email address to submit objections. 36 CFR 219.52(c)(3) clearly states the Forest Service must provide an email address. The Forest Service has provided a web site with a comment form, but not an email address as required under 36 CFR 219.52. The website form is identified as a comment form, not an objection. This has created confusion and denied the public a clear and defined process for submitting an objection.

[sect] 219.52 Giving notice of a plan, plan amendment , or plan revision subject to objection before approval.

(c) The content of the public notice for the beginning of the objection period for a plan, plan amendment, or plan revision before approval ([sect]2J 9.J 6(a)(3)) must:

(3) Include the name and address of the reviewing officer with whom an objection is to be filed. The notice must specify a street, postal, fax, and email address; the acceptable format(s) for objections filed electronically; and the reviewing officer's office business hours for those filing hand-delivered objections. An email address would allow an individual to submit an objection and receive confirmation the objection was received. It would also allow an individual to draft their objection over time and attach the objection to their email sent to the Forest Service for submission.

I request the Forest Service follow the law in their process of accepting objections.

Objection 2:

On June 12, 2020, Secretary Purdue issued a memorandum to the Chief of the Forest Service with the purpose to establish vision, priorities, and direction on:

- * Increasing the productivity of National Forests and Grasslands
- * Valuing our Nation's grazing heritage and the National Grasslands
- * Increasing access to our National Forests
- * Expediting environmental reviews to support active management

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(over..)

The new directive was released after all opportunities for public comment have closed on the Helena Lewis and Clark National Forest Plan.

The memorandum highlights "Increasing access to National Forest System Lands" and specifically states:

- * It is imperative for the Forest Service to manage the National Forests and Grasslands for the benefit of the American people. These lands provide a multitude of public benefits, including diverse recreational opportunities, access to world-class hunting and fishing, and forest products that support America's traditions and way of life. Accordingly, the Forest Service will:
 - * increase access to Forest Service lands by streamlining the permit process for recreational activities and embracing new technologies and recreation opportunities;
 - * open public access to National Forest System lands with currently limited access where feasible in cooperation with States, counties, and partners; and
 - * improve customer service by modernizing and simplifying forest products permitting and the Forest Service land exchange process. "

The new Helena Lewis and Clark National Forest Plan contradicts the new directive from Secretary Purdue by in fact reducing access opportunities for recreation. The new plan proposes to close thousands of acres to winter snowmobile use and hundreds of miles currently open to motorized and mechanized use.

I request the proposed Forest Plan be remanded and the agency consider developing a plan that is consistent with the June 12, 2020 directive from Secretary Purdue.

Objection 3:

The new plan has false statements such as on page 1 of the FEIS Summary. Specifically it states "the Forest Plan does not authorize site-specific projects or activities" when in fact the plan on page 27 of the FEIS Record of Decision it states: "I will initiate site-specific NEPA decision per the Plan's suitability direction to close these uses within the recommended wilderness areas within 3 years from the date of this decision." In fact, the plan has

made site specific decisions by identifying areas of "Recommended Wilderness" and then removing the historic and established motorized and mechanized use in these areas. This is clearly a site-specific decision which has been included in the new Forest plan.

The public was told during the development of the FEIS that this Forest Plan would not make site-specific decisions. The public was told the Forest Plan was much like a zoning document and would not affect current use. The public was not aware the new Forest Plan would in fact make site-specific decisions.

Another false statement in the FEIS is found in Chapter 3.17, Recreation Opportunities.

3.17 Recreation Opportunities

3.17.1 Introduction

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 were submitted during the scoping and DEIS comment periods on the need to increase multiple use recreation access and opportunities. The Forest Service seems to have ignored these comments by including the above statement. The Forest Service must address the need for increased access and acknowledge the comments received requesting increased multiple use access.

I look forward to discussing these important issues with the Objection Review Officer that arose after the public's opportunity to comment on the plan. Thank You for considering our concerns.