

Data Submitted (UTC 11): 7/8/2020 7:00:00 AM

First name: Kerry

Last name: White

Organization: Citizens For Balanced Use

Title:

Comments: CBU objects to the Helena Lewis and Clark National Forest Plan for the following reasons:

Objection #1

The new HLCNF Plan has failed to address comments (Exhibit A) Citizens for Balanced Use (CBU) submitted during the comment periods by [comment 149-1] not providing an alternative which increases access for both motorized and mechanized use. The demand for motorized and mechanized use has increased and this fact has been acknowledged by the Forest Service in their documents (one example on page 1, FEIS Summary), yet no such alternative was given to the public. [comment end] [comment 149-2] The plan states on page 2 of the FEIS Summary that the USDA FS Strategic Plan: Fiscal Year 2015-2020 contains 4 outcome-oriented goals but only provides 2 of the 4 goals are mentioned or considered in the new Forest Plan. By using only 2 of the 4 goals while ignoring other important goals in the USDA FS Strategic Plan, the new HLCNF Plan is flawed.

Below are excerpts from the USDA FS Strategic Plan which I believe the HLCNF Plan must consider in their decision but failed to address.

Deliver Benefits to the Public

Recognizing the importance of forest stewardship, our country set aside the national forest reserves in 1897 to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber. In 1960, the Multiple-Use Sustained-Yield Act declared that the national forests should be managed for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.¹¹

Delivery of forest-related goods and services is integral to our mission at the Forest Service, stimulating tangible economic benefits to rural communities, such as private-sector investment and employment

[comment 149-3] opportunities. The economic activity we support is directly attributable to the natural resource investments we make and the use of national forest and grassland resources that result in marketable products associated with outdoor recreation, hunting, fishing, timber production, livestock grazing, mineral production, land stewardship, and other activities.

Strategic Objective F. Connect people to the outdoors

We are broadening the scope of our recreational services to include more Americans, giving a wider range of access to the national forests and grasslands. We are making recreational facilities on the national forests and grasslands more accessible to everyone, including the estimated 57 million Americans with disabilities. Nationwide, we have more than 23,000 accessible recreational sites, such as campsites and picnic areas, and 8,000 accessible recreation buildings. By making our facilities more accessible, we are also providing additional recreation opportunities for senior citizens, large family groups, and families with infant strollers or young children. We are committed to inclusive participation in recreation opportunities for all people, regardless of age or ability.

The Forest Service has been selective in what National Strategic planning direction they have included in the new Forest Plan. The National Strategic Plan clearly provides direction in increasing access and additional recreational opportunities for senior citizens, large family groups, and families with infant

strollers or young children. The Forest Service has ignored this National directive and instead has created

a plan that reduces access opportunities. The HLCNF failed to follow the National Strategic Plan and even selectively removed some of the National goals in the new Forest Plan FEIS. This action has created a Forest Plan which should be considered arbitrary and capricious. I request review the Forest Plan for consistency with National policy and remand the decision until consistency is achieved. [comment end]

Objection #2

In a letter dated April 23, 2019 (Exhibit B) from Region 1 Supervisor Leanne Martin, to Director,

Ecosystems Assessment and Planning, she states Any Regional memos, letters, or supplements guiding Land Management Plan revision dated before January 30, 2015 are suspended. A subsequent letter dated August 6,

2019(Exhibit B) from Forest Service Chief Victoria Christensen to Idaho Senator Crapo, Senator Risch, Congressman Fulcher, and Congressman Simpson states:

Thank you for your letter of June 13, 2019, cosigned by your colleagues concerning management of recommended wilderness areas in the U.S. Department of Agriculture Forest Service Northern Region. I apologize for the delayed response.

I understand the perception that the Northern Region has a policy that differs from the national direction, based on guidance that was issued by former Regional Forester Thomas L. Tidwell before the 2012 planning regulations. I assure you the Northern Region is following national policy. Enclosed is a memo signed by current Regional Forester Leanne Martin dated April 23, 2019, that clarifies that national direction implementing the 2012 planning regulations provides the policy and procedures for all land management planning efforts- all prior direction has been superseded.

I appreciate your ongoing collaborative engagement in land management planning and implementation efforts across the state of Idaho. The national policy provides a responsible official the discretion to

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implement a range of management options, provided the allowed activities and uses do not reduce the wilderness potential of an area. Government and public engagement in decisions affecting the National Forest system is critical as responsible officials apply their discretion to the management of these areas.

Thank you for your interest in the management of your National Forests. A similar response is being sent to your colleagues.

[comment 149-5] Previous guidance from Regional Forester Thomas Tidwell was to remove all motorized and mechanized use in areas recommended as wilderness. This guidance has been suspended. Helena Lewis and Clark National Forest Supervisor Bill Avey has reinstated this blanket policy in the new Forest Plan as stated throughout the plan. For example, see below an excerpt from the Draft Record of Decision.

Draft Record of Decision

Page 27

A significant issue in the analysis was whether or not motorized and mechanized recreation uses affect wilderness characteristics and the potential for Congress to consider these areas as additions to the National

Wilderness Preservation System. I reviewed the alternatives analyzed in the final EIS, some in which mechanized means of transportation in recommended wilderness were suitable and some in which these uses were unsuitable. I decided that motorized uses (including snowmobiles) and mechanized means of transportation (mountain biking) are unsuitable in recommended wilderness. This decision preserves the wilderness characteristics, including the sense of remoteness and the opportunities for solitude in recommended wilderness, recognizing that ample opportunities for motorized uses and mechanical means of transportation (mountain biking) are available outside of recommended

wilderness. I arrived at my decision on recommended wilderness after extensive engagement with my staff, local governments, tribes, commenters, our public and consideration of all sides of the issue. There are those who prefer additional acres recommended as wilderness to protect places they consider special, or because they believe recommended wilderness management is the best strategy to protect wildlife and aquatic resources. There are also those that prefer I don't recommend any additional areas because they believe management and access in recommended wilderness is too restrictive. I considered the existing uses, current allowable uses, and the protections afforded by other management overlays. I decided on recommending wilderness areas that are manageable, currently have little to no motorized and/or mechanized means of transportation uses, and which truly add value if designated as wilderness by Congress in the future. Although several commenters expressed concern that the management of recommended wilderness creates de facto wilderness areas in lieu of action by Congress, the Plan does not create wilderness. The Forest Service has an affirmative obligation to manage recommended wilderness areas for the social and ecological characteristics that provide the basis for their

recommendation until Congress acts. There is

based upon our monitoring and what we've heard from the public. This decision reflects public comment in favor of ensuring these areas remain suitable for inclusion in the National Wilderness Preservation System, should Congress make that decision. While motorized and mechanized uses are unsuitable under

the Plan, I will initiate site-specific NEPA decision per the Plans suitability direction to close these uses within the recommended wilderness areas within 3 years from the date of this decision.

[comment 149-6] The plan states that no specific current travel plans will be impacted and on page 1 of the Summary it states: The Forest Plan does not authorize site-specific projects or actions yet the deciding officer states in the Draft Record of Decision that he will close these areas of recommended wilderness to historic use of motorized and mechanized use within 3 years. The supervisor does have discretion as stated by Chief Christians August letter, but the proposed HLCNF Plan is implementing a blanket

closure of motorized and mechanized use in areas of recommended wilderness without proper analysis of these current uses on wilderness character. I request this action be reviewed and at a minimum the Forest Service should complete site specific analysis of the impact of the current use of motorized and mechanized use in these areas of recommended wilderness before making the decision to remove these uses. The forest wide decision to remove motorized and mechanized use in areas of recommended wilderness without site specific analysis is both arbitrary and capricious. [comment end]

[comment 149-7] Motorized and mechanized use provide access opportunities that follow the National Strategic Plan of increasing access for all people, regardless of age and ability as seen in the following statement from the National Strategic Plan. we are also providing additional recreation opportunities for senior citizens, large family groups, and families with infant strollers or young children. We are committed to inclusive participation in recreation opportunities for all people, regardless of age or ability.

The HLCNF Supervisor has strayed from the National Strategic Plan by in fact reducing access to most people. Only the young and physically fit can walk or hike long distances into and on our federally managed public lands without assistance from motorized and mechanized transport. Even the Forest Services own surveys show an astounding 97 percent of the people recreate on lands open to multiple use while less than 3 percent recreate in designated wilderness or lands closed to motorized and mechanized use. The proposed HLCNF Plan will remove even more access opportunities. [comment end] [comment 149-8] Again, the Forest Service failed to

provide an alternative to the public which would have increased motorized and mechanized use. NEPA requires a wide range of alternatives for the public to comment on during the process but

no alternative to increase access for senior citizens, families with young children, the physically challenged, or the disabled was provided to the public. This was a specific request made during the scoping process of the plan but was ignored. This is a clear violation of NEPA and I request the proposed plan be remanded until the plan is supplemented with an alternative that increases access opportunities for all people. This is the purpose of having a National Strategic Plan. Local decision makers and planning teams must not ignore national direction, but in the case of the HLCNF, they have ignored the national direction of increasing access for all people. [comment end]

Objection #3

[comment 149-9] CBU 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

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 comments from CBU 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/Committees/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 by providing an additional alternative increasing multiple use recreational access. [comment end]

Objection #4

[comment 149-19] The Forest Service failed to comply with the President's Council on Environmental Quality (Exhibit D) 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.

CBU requests 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. This analysis should include the 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 cumulative 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. [comment end]

Objection #5

[comment 149-13] 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 in the FEIS summary on page 6:

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.

CBU has included (Exhibit E) a list and brief summary of all federal coordination and cooperation policies (statutes, regulations, presidential executive orders, agency directives, handbooks and guides) that require cooperation and coordination with local and state governments. [comment end]

Project or activity planning

1. resolving inconsistency,

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 [sect] 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 representativesfrom those agencies were initiated, and ongoing dialogue continues While certaincomponentsmay not befully consistent,the HLC NF will continue to

work with these entit ies to address the impacts and benefits fromforest management.

Objection #6

This following objections relate 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 comment 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.

Issues arising after release of the FEIS

#1

[comment 149-15] The Forest Service has violated 36 CFR 219.52 in not providing an email address or fax number to submit objections in the release of the FEIS. This issue arose after the release of the FEIS. 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.

1. The content of the public notice for the beginning of the objection period for a plan, plan amendment, or plan revision before approval ([sect]219.16(0)(3)) must:

1. 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 officers officebusiness hours for those fiding 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.

[comment 149-15] The Forest Service has violated 36 CFR 219.52 and in doing so has denied public participation in this process and violated NEPA.

Also, the Forest Service failed to provide a fax number to the public until June 18, 2020 and only after contacting Senator Daines to assist in obtaining the fax number did the Forest Service provide this information. [comment end]

[comment 149-16] On June 12, 2020, Secretary Purdue issued a memorandum (Exhibit C) to t h e Chief of the For est Service with the purpose to est ablish vision, prioriti es,and direction on:

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- * 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

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:

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- * 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 Purdué 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 of roads and trails 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 Purdué. [comment end]

#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 sit e specific decisions by identifying areas of Re commended Wilderness and then removing the hist ori c and established motoriz ed and mech anized u se in these

areas. Thi s is clearly a sit e-specific decision which has been includ ed in the new For est plan.

The public was told during the development of the FEIS that this Fore st Plan would not make sit e[shy] specific decision s. The public was told th e Forest Plan was much like a zoning docum ent and would not

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affect current use. The public was not aware the new Forest Plan would in fact make site-specific decisions.

The new Helena Lewis and Clark National Forest Plan FEIS has violated several laws and regulations including NEPA. These violations have resulted in a document which is both arbitrary and capricious. [comment end] CBU is looking forward to meeting with the objection review officer to discuss these issues and violations of law. [comment end]

Sincerely, Kerry White

Executive Director Citizens for Balanced Use

ExhibitA

Citizens for Balanced Use
Box 606, Gallatin Gateway, MT 59730 www.balanceduse.org
1-406-600-4CBU

Helena Lewis and Clark Forest Supervisor 2880 Skyway Dr.

Helena, Montana 59602

Please accept these comments on the Helena Lewis and Clark National Forest DEIS on behalf of Citizens for Balanced Use (CBU). CBU has over 8000 active members and represents over 100,000 citizens in the state of Montana through our 68 supporting organizations.

The work horses of the federally managed land in Montana are the motorized community. There is no secret that

the multiple use of our public land in Montana is under attack. Well-funded and organized anti-access groups want nothing more than to return our land to a prehistoric state claiming that this is the natural way. The people of Montana and around the nation deserve better.

Motorized recreationists have far less opportunity on a user per mile basis and non-motorized recreationists have a far greater opportunity. (93,088 miles of non[shy] motorized trails versus 31,853 miles of motorized in entire national forest system. [http://www.fs.fed.us/recreation/programs/ohv/travel_mgrnt_schedule .pdf](http://www.fs.fed.us/recreation/programs/ohv/travel_mgrnt_schedule.pdf)).

National forests are not managed for motorized recreation at the same level as non[shy] motorized recreation . All other uses are elevated above motorized recreation. In order to meet equal opportunity obligations, an equal number of miles times a quality factor of motorized trails must be provided. The current balance sheet is significantly in the favor of non-motorized opportunities and is contrary to the actual visitors and their needs. In too many cases a small number of non-motorized users have been able to displace hundreds of motorized users . A decision that allows a few non-motorized recreationists to convert a motorized trail used by hundreds of motorized recreationists for their exclusive use is not reasonable.

List of Current and Immediate Past Actions Affecting Multiple-Use Recreation

United States Court Of Appeals for the Ninth Circuit

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No. 01-35690 D.C. No. CV-96-00152-DWM

Every Resource Management Plans and Planning Actions (inter-agency) Grizzly Bear Recovery Plan

(inter-agency) ICBEMP

(inter-agency) Northern Rockies Lynx Amendment (inter-agency)3-States OHV Strategy

B-DNF Continental Divide Trail near Jackson, MT B-DNF Whitetail Pipestone Travel Plan

B-DNF 2003 Forest Plan Update

B-DNF Analysis of the Management Situation B-DNF Continental Divide trail near Feely

B-DNF Continental Divide trail near Whitetail-Pipestone B-DNF Social Assessment

B-DNF Mussigbrod Post Fire Roads Management B-DNF & BLM Flint Creek Watershed Project BLM

Blackleaf Project EIS

BLM Dillon Resource Management Plan BLM Headwater Resource Management Plan BLM Arizona Strip Travel Plan

BLM Bruneau Resource Area Travel Plan BLM Escalante Grand Staircase Monument BLM Missouri Breaks Monument

BLM Moab Resource Management Plans BLM National OHV Strategy

BLM National Mountain Biking Strategic Action Plan BLM San Rafael Travel Plan

BLM Sleeping Giant Travel Plan

BLM Whitetail/Pipestone Rec. Management Strategy BLM Lake Havasu RMP

BLM Sustaining Working Landscapes Initiative

BLM Rocky Mountain Front Scenery Evaluation Project BLM Kanab Resource Management Plan

Bitterroot NF Fire Salvage EIS

Bitterroot NF Post-fire Weed Mitigation EIS Bitterroot NF Sapphire Divide Trail Bitterroot NF Forest Plan Revision

Caribou NF Travel Plan

Custer National Forest Travel Plan EPA Tenmile Creek Watershed Plan

Flathead NF Robert Wedge Post Fire Project Flathead NF West Side Reservoir Post Fire Project Flathead NF Forest Plan Revisions

Flathead NF Moose Post Fire Road Closures Flathead NF Spotted Bear Road Closures Gallatin NF 2002 Travel Plan Update Helena NF Blackfoot Travel Plan

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Helena NF Blackfoot Water Quality Plan Helena NF Cave Gulch Fire Salvage Sale Helena NF Clancy-Unionville Plan Helena NF North Belts Travel Plan Helena NF North Divide Travel Plan Helena NF Noxious Weed Plan

Helena NF South Belts Travel Plan Helena NF South Divide Travel Plan

Helena NF Continental Divide National Scenic Trail Humboldt Toiyabe NF Charleston-Jarbridge Road Humboldt Toiyabe NF Spring Mountains NRA Kootenai NF Bristow Restoration Project

Kootenai NF McSwede Restoration Project Kootenai NF Forest Plan Revisions

Lolo NF Forest Plan Revision L&C/CNF Judith Restoration Plan

L&C/CNF Rocky Mountain Front Travel Plan L&C/CNF Snowy Mountain Travel Plan L&C/CNF Travel Plan update

Montana State Wolf Plan

Montana State Trail Grant Program PEIS Montana State Trail Plan PEIS

Montana FWP Statewide Outdoor Recreation Plan Nez Perce NF Travel Plan Revisions

NPS Salt Creek Road Closure

NPS Yellowstone Winter Plan (snowmobile closure) Payette NF Travel Plan Revisions

Sawtooth NF Travel Plan Revisions

USFS National OHV Policy and Implementation

USFS Forest Plan Amendments for Grizzly Bear Habitat Conservation USFS National Strategic Plan 2003 Update

USFS Roadless

USFS Roadless Rule II USFS Roads Policy

USFS National Land Management Plan Revisions USFWS Bull Trout Recovery Plan

USFWS Westslope Cutthroat Trout ESA

USFWS CMR National Wildlife Refuge Road Closures USFWS Sage Grouse Plan

A conflict of uses is routinely used to create non-motorized routes and close motorized routes yet there is no significant documental evidence to support conflict of uses on individual routes, i.e., there are not 100 reports of conflict of uses within

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any travel management area. A conflict of uses is routinely used to create non-motorized routes and close motorized routes yet sharing of resources is a reasonable alternative and reasonable expectation that would keep routes open for all visitors.

The forest travel plans that are going on around Montana are using generated, estimated and false data to forward an agenda of flocking people out of the forest. The economic impact of these closures will be significant and devastating to small communities throughout Montana. As required by the President's Council on Environmental Quality, some degree of effort must be used by the Forest Service to gather true on the ground data from businesses and individuals that use our public lands. This has not been done by your forest in preparing the travel plan document. Please use actual local data as to the economic and social impact of your proposed closures.

The Helena Lewis and Clark National Forest is using the IMPLAN Pro input[shy] output modeling system for the economic analysis. CBU finds that the input amounts do not reflect the true economic data that would be used if actual surveys of businesses were used. We see no effort being made by your forest to gather true information as required by the CEQ. The output from the IMPLAN modeling system can only be as good as the data that is plugged into the model. Arbitrary results from estimated and generated input data should not be used. True on the ground economic data must be collected and used.

Wildlife studies from the past are full of possible scenarios that at the time were all that a biologist had to predict the possible impact of multiple uses on wildlife. The last few years have brought us actual true data that must be used by the Forest Service and the old antiquated predictions must be discarded. If the Best Available Science is not used in formulating the DEIS document your conclusions will be arbitrary and capricious.

Heart monitors were put on elk in Yellowstone Park and the heart rate and flight distances were recorded as snowmobiles and cross country skiers went by. (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.) Elk were disturbed twice as much from non-motorized as from motorized. This discovery can be transferred to ATV and motorcycle use in the summer in relation to hikers and not to mention the impact on wildlife from dogs. Motorized users rarely take pets with them and as in Bozeman we are seeing a huge impact from dogs on our public land. The Forest Service must take this information in to account when deciding the allowed uses of our federally managed public land.

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A lynx study was completed in the Seeley Lake area that showed no adverse impact to Lynx from winter snowmobile use. The results of this study and the true data that was collected must be used in evaluating areas open or closed to snowmobiles. The closure of any area because of winter motorized impact to lynx is not valid and therefore must not be used to initiate closures.

The Grizzly Bear study in the Swan Valley of Montana shows that 99 percent of the bears spent 99 percent of

their time on Plum Creek property. This property has been heavily logged resulting in the growth of grasses and bushes that support bears. Thick and overgrown timber does not allow for the grasses and ground cover to grow. As we now see by this study, critical bear habitat is quite different than what was once assumed. Starved for sunlight and moisture, the unmanaged areas are ripe for fires that will destroy watersheds and wildlife, sterilize soils and pollute our air. Because of the true science that has been gathered by this study on the bears in the Swan valley, I request that the Forest Service discard the original road density guidelines and initiate new guidelines that reflect the habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by mere predictions and assumptions must not be used when true science and actual data is available.

The EPA issues warning after warning in Montana year after year for poor air quality. Is this the management practice that the FS is going to impose on the people of this state in the years ahead? If the FS is going to have a policy burning the forest and the renewable resource that lies in that forest, I request that a plan be put in place to deal with these fires before they occur. Pre-fire planning must be improved and access to prepare and initiate initial attack on these fires must be provided. The smoke from catastrophic fires contains large amounts of mercury and is very hazardous to anything that breathes along with depositing these particulates and mercury into streams and lakes.

Roads are being decommissioned on the premise of reduced sediment production; however, research has shown that decommissioning actually increases sediment production (Sediment Production From Forest Roads In Western Montana, Brian D. Sugden and Scott W. Woods, Paper No. J05063 of the Journal of the American Water Resources Association (JAWRA)). The large amounts of recommended wilderness in the DEIS coupled with the policy to remove all motorized and mechanized use in these areas will result in decommissioning and obliterating motorized and mechanized trails and roads, increasing sedimentation to our rivers and streams.

Every action starts and ends with a proposal to close motorized opportunities (Gallatin, Clancy-Unionville, North Belts, South Belts, Little Belts, Rocky Mountain District, Custer, Beaverhead-Deer lodge, Dillon RMP, Butte RMP, etc.)

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and provide considerably less motorized and mechanized access and recreation. There has not been one action that included an alternative to increase existing motorized opportunities, mitigate for cumulative effects and create motorized recreational opportunities to address the growing needs of the public. Motorized recreationists are put at an immediate disadvantage in every process and that disadvantage is carried through to the end. An obvious sign of a process that is biased to produce motorized closures regardless of the facts and needs of the public.

The DEIS for the Helena Lewis and Clark did not take into account the available area of wilderness for non-motorized opportunity for solitude. When creating a balanced of user opportunity on a forest, the existing non-motorized areas in wilderness must be used in the comparison for more accurate matrix of user opportunity which will show the actual amount of available use types throughout the entire forest. To close areas of multiple use without taking the wilderness areas into consideration is unacceptable.

Any measurable impact from OHV use is judged to be significant. Why? OHV impacts are a small fraction of natural actions. Nature should be used as the standard for comparison of OHV impacts. Wildfires managed by the agency produce incredibly large amounts of smoke, particulates, vegetation damage, carbon dioxide, sediment, wildlife deaths, etc. which is presented by the agency as acceptable. In comparison, relatively insignificant impacts by motorized use in the same categories are judged to be significant and unacceptable. The evaluation and magnitude of impacts on erosion and wildlife from motorized recreation is held to a much higher standard than non-motorized recreation or even naturally occurring events such as fires and floods. Studies indicate significantly more disturbance to wildlife from non-motorized yet these impacts are not used to close areas to non[shy] motorized.

We know that the fires will come and yet we spend millions on protecting structures and putting the fires out when they start. Would it not make more sense to prepare for these fires with fire breaks in strategic locations? This would require a plan to be formulated and initiated that takes into account all related issues of fire and the management of fire as a tool. Catastrophic fires are very destructive and their effect on wildlife, air and watersheds are devastating. The FS has done a very poor job in planning for these fires and the time has come for this action to change.

Federal direction has changed and now the FS is required to put forward a fire plan.

CBU believes that trails and roads in the Helena Lewis and Clark National Forest should be part of this plan and until such a plan is created, the FS should not close the door on any opportunity for trails and roads to be open to multiple use recreation, fire management, search and rescue, weed control, wildlife management, etc.

A survey conducted by the Beaverhead-Deerlodge National Forest shows that less than 3 percent of the forest users recreate in wilderness areas. There are more exclusive non-motorized/wilderness areas and trails (both quality and quantity) than OHV areas even though NVUM statistics for all national forests show that there were 8,602,000 wilderness visits and 239,415,000 multiple-use visits or 3.59% wilderness and 96.41% multiple-use

(http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf).

It stands to reason that this information on the BDNF would apply to the other National Forests in Montana. The effort by the Forest Service to create more wildernesses will only result in more impact to the reduced amount of multiple use areas that remain. With the lack of funding to the Forest Service because of the reduction of timber sales that have occurred over the last 30 years and the reduction of mills from around 60 in the state to the present number of about 8 has placed the Forest Service in a position of a non-receipt agency and reduced infrastructure to meet the needs of active forest management. Lost jobs, less economic benefit to communities, and more private property and lives put at risk. This trend goes against the Organic Act and the Multiple Use Sustained Yield Act and must be changed. If the Forest Service is to be able to maintain the roads and trails it must form partnerships that include the workhorses of the public lands which is the motorized and multiple use community.

Take for example the Gallatin Valley Snowmobile Association located in Bozeman. Last year this club cleared, repaired and maintained 192 miles of trail. In addition to this summer work this club groomed over 2000 trail miles for everyone to use. These are the best kept trails on the Gallatin National Forest. When comparing these multiple use trails to the trails in wilderness areas, we find that the wilderness trails are full of down timber resulting in switchbackcutting by hikers and erosion from lack of maintenance. A trail inventory and assessment that was done by the Gallatin National Forest revealed that 85 percent of the renegade or user created trails in the GNF were created by non-motorized users. With this information on the GNF, it only stands to reason that this would be the case on every forest in Montana.

Non-motorized users prefer the multiple use trails as they are the best maintained and provide the best recreational experience. The problem comes when the FS does not properly sign the trails. When a picture of a motorcycle, 4x4, ATV and snowmobile are shown at the trailhead with a circle and red strike through them, it portrays to the non-motorized user that this trail is closed to motorized users. Many people do not notice the dates that are associated with the sign showing when the motorized closure applies. The conflict between users is being caused by the agency and its disregard for the need of clear signage. A standardized multiple use sign for these areas must be posted to clearly inform people of the uses.

allowed in these areas. This corrective action would stop many complaints that the FS receives on user conflicts.

All the studies that CBU has been able to find show a significant increase in both motorized and mechanized use and an increase in demand for these opportunities. The recreation specialist report on the scoping document in the Custer Gallatin National Forest acknowledges the fact that motorized and mechanized use is growing significantly and recommends additional opportunities be identified and provided to the public. The Helena Lewis and Clark DEIS must recognize this fact and prepare an alternative that increases motorized and mechanized opportunities. NEPA requires a broad range of alternatives be provided to the public for comment. The Helena Lewis and Clark NF has failed to provide the motorized and mechanized public land users an alternative that reflects their current and future needs.

Motorized use on public lands is the fastest growing type of recreation in the

U.S. today. The USDA Southern Research Station validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (<http://www.srs.fs.usda.gov/trendsRecStatUpdate3.pdf>). This document reports that the total number of OHV users has grown to 49.6 million by the fall 2003/spring 2004 out of a total population of 214,022,000. Therefore, the overall percentage of OHV recreationists in the country is 23% and it is much higher in Rocky Mountain States often approaching 30%.

The Montana Business Quarterly Volume 52, number 3, autumn 2014 reported OHV use has quadrupled from 1995 to 2014 with registered owners increasing in that time from 20,000 to nearly 80,000 in Montana. According to that same study snowmobile registration has tripled from 1991 to 2013 with registered owners increasing from 15,000 to nearly 55,000 on Montana. According to the American Recreation Coalition and the 2017 Outdoor Recreation Outlook OHV spending nationwide contributed nearly \$109 billion dollars of direct spending and over \$1.5 million jobs. Over 60,000 new snowmobiles were sold in the U.S. in 2016 with a growth in this activity of 10%. According to a March 2018 article in the Billings Gazette by Brett French outdoor recreation generated \$373.7 billion dollars to the GDP in 2016, larger than oil and gas extraction. The largest portion of this spending came from motorized recreation spending at \$59.4 billion dollars. Boating and fishing were second at a mere \$38.2 billion . The article further states that backpacking, climbing and other activities associated with non-motorized use accounted for \$10 billion dollars.

Nearly 6 times the spending on recreation comes from motorized recreation yet the Helena Lewis and Clark National Forest is closing addition areas to motorized use. The HLCNF clearly has ignored the statistics and trends in recreation and has determined their alternatives in an arbitrary and capricious manner. If the HLCNF were to adhere to the clear demand and significant increases in OHV and

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snowmobile use needs they would at the very least provide an alternative to the public for comment that reflects these increased needs. The current NEPA document is flawed and CBU requests a supplemental DEIS alternative be provided to the public for comment that identifies increased opportunities for motorized use.

One of the reasons for the increased need for motorized use is the ageing population and the retirement of a segment of the population known as the baby boomers. These people have money to spend and time to recreate. Many of these people are physically challenged and need some sort of transportation to assist them in the ability to enter our public lands. Many of the public land areas of Montana are restricted to motorized use at this time and any more area closures without justification are simply wrong. Motorized trail inventories that were conducted on the GNF show little to no resource damage has occurred and I am sure that this is the case on every forest in Montana. The HLCNF has failed to complete an assessment of resource damage on this forest and this lack of information forms the basis of a decision, not based on fact, but based on

assumption and flawed of missing data. Unsubstantiated decisions are considered to be arbitrary and capricious. CBU requests a complete inventory and analysis on any and all resource damage caused by motorized recreation. The analysis should include possible mitigation actions to address any identified resource damage before actions to remove these uses are implemented. Any more loss of multiple use trails in Montana will

severely impact the ageing population of the entire U.S. and this action is completely unnecessary. The FS must consider this very large population and their needs.

CBU requests that an alternative be made available that increases motorized and mechanized opportunities. A reasonable pro-recreation motorized alternative was not developed during the process even though the number of motorized recreationists is significant and growing. At the same time a number of non-motorized and conservation alternatives were developed. All of the ongoing planning projects have one common critical flaw: a lack of an alternative that adequately addresses the growing need for motorized recreation. At the same time, all of these planning actions more than adequately addressed a false public preference of non-motorized recreation.

A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized and mechanized use, designates which vehicles will be allowed on which routes and if seasonal restrictions apply. These travel plans are designed to be site specific. A Forest Plan revision is a board based document much like a zoning plan where areas of the forest are designated as appropriate for specific uses including motorized, mechanized, mining, grazing, timber harvests, and other activities. The conflict arises when the Forest Plan revision designates areas

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appropriate for specific uses without any site specific analysis. Areas identified as areas recommended for wilderness in the Forest Plan will then restrict motorized and mechanized use in these areas because of a philosophy or policy being developed over time from Region I, but implemented without any site specific analysis.

The HLCNF informs the public that the new Forest Plan is not and does not make site specific decisions on roads and trails available for motorized and mechanized use. This is a false statement when in fact areas in the Forest Plan identified as not suitable for motorized and mechanized use or areas recommended for wilderness will result in future decisions where site specific road and trail analysis is not done before closures to these uses occur. CBU requests the Forest Service identify areas currently being used by motorized and mechanized users and adjust the proposed boundaries of these areas to remove them from recommended wilderness and areas not suitable for motorized and mechanized use.

CBU also requests the Forest Service complete a comprehensive NEPA analysis engaging the public on the policy or philosophy of removing all motorized and mechanized use in recommended wilderness areas. This NEPA analysis was never completed on this particular significant action which has been implemented only in Region 1.

Common signs posted by the Forest Service state Non-motorized Uses Welcome. We have never seen a sign that says Motorized Uses Welcome. A not so subtle sign of bias.

Congress is the Government body that is elected by the people and must answer to the people for their actions. As representatives of the people, this body decides what areas of our National Forest will be designated as wilderness. The proposed language to be used that is known as RWA is only a way for the FS to circumvent the authority of congress and its responsibility to designate wilderness. The RWA designation that the FS is proposing will create illegal defacto wilderness areas that are off limits to motorized and multiple uses. The use of this term and the action taken by the FS that results in more closures is unacceptable.

The new verbal directive from Region I to remove all motorized and mechanized use in Recommended Wilderness Areas is an action by the Forest Service beyond their authority. This action of creating defacto wilderness without the consent of congress is circumventing the legislative intent of the 1964 Wilderness Act. FS agencies frustration with the lack of congress to take action on wilderness designations should not embolden them to a point where they act illegally. CBU will continue to monitor these acts outside the scope and authority

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of the agency and take appropriate action when necessary to force the agency to comply with the appropriate laws, regulations and Acts.

In a time when resources are vital to our nations economy and jobs, and our federally managed public land is one of tremendous potential for the development of these resources, the FS must recognize that timber is a renewable resource. The action by the FS to allow millions of acres of timber to burn every year is a waste. President Bush and Congress put forth the Healthy Forest Initiative yet the FS has delayed many projects due to frivolous lawsuits brought forth by environmental groups. The amount of timber harvested each year from our National Forests does not even come close to the amount of new growth that occurs every year. The wasteful practices of the FS must stop. There are over 290 million board feet of timber sales tied up in litigation today in Region One.

The FS should be required to use Best Management Practices in their approach to forest management. If a forest district does not bring forth plans to deal with the over grown condition of their forest region then funding to that district should be stopped. Because of the lack of receipts that the forest service produces, the general population of a county has to pick up the tab in the form of increased taxes. This is putting an undue burden on the tax payers of the state of Montana.

The FS is no longer an agency that belongs in the USDA unless it can generate revenue. A better place for the FS may be in the Department of Commerce or Interior.

The list of federal laws and acts the HLCNF is violating includes the Multiple Use Sustained Yield Act (16 U.S.C.

sec. 528), the Taylor Grazing Act of 1934, the Organic Act of 1897 (16 U.S.C. sec. 475), the Mining Law of 1872, the Mining and Mineral Policy Act of 1970, the Wilderness Act of 1964, the Endangered Species Act, Clean Water Act, Clean Air Act, and MEPA.

All these Acts and Laws have one thing in common that the Forest Service has ignored in the HLCNF Plan revision. The Forest Service has wrongly elevated wildlife and land conservation and preservation above what these laws and Acts intended. Surface resources in these laws and Acts were to be used for the benefit of the citizens.

Multiple Use Sustained Yield Act to provide sustained yield of products and services, Taylor Grazing Act surface resources are just as important as other resources, Organic Act to ensure a continuous supply of timber, Mining Act Accessibility to the mineral resources located on these lands must be protected, Mining and Mineral Policy Act while recognizing the environmental concerns, the benefit of mining to this country and its people must remain paramount,

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Wilderness Act we must insure in future planning, that other federal lands do not become defacto wilderness areas, Endangered Species Act/Clean Water Act/Clean Air Act/MEPA we must take care to insure that cumulative effects of these laws do not prohibit the management of our resources for future generations.

The DEIS falsely claims the Forest Service has complied with these laws and Acts when in fact the proposed alternatives prohibit, curtail or restrict the use of our surface resources that benefit the people of the United States. CBU requests further explanation by the Forest Service in why they believe they have complied with these specific laws and Acts. Please explain how additional areas of recommended wilderness will not prohibit, restrict, or curtail access to the surface resources these Acts and laws were designed to protect and assure access to. The Forest Service has ignored these laws and Acts and has instead elevated other resources such as wildlife above those resources these laws and Acts were enacted to preserve.

What surface resources will be lost to the benefit of the people of the United States if the current proposed plan is implemented? What alternative did the Forest Service provide to the public as required by NEPA that protects access to all these surface resources? Please identify all surface resources that will be affected by lost access including the type, location and potential benefit.

The Forest Service must not diminish the importance of access to these surface resources as stated in these laws and Acts. Clearly congress intended the public lands at that time, and those managed by the Forest Service when it was formed, to be available to the public to access them and the use of the surface resources for the

benefit of the people of the United States. CBU finds no alternative that complies with the clear language and intent of these laws and Acts. The Forest Service is arbitrary and capricious in ignoring these laws and Acts and the intent of congress when these laws and Acts were passed.

In formulating the new travel and management plans for this forest the FS must look at the cumulative effects (CEQ requirement) of past actions that have affected communities and motorized forest users. No past plan or action has affected non[shy] motorized use so no cumulative effect analysis needs to be done for non-motorized users. The same is not true for the motorized and mechanized user. Many past actions have greatly diminished the recreational experience and opportunities of the motorized and mechanized users. I request that your forest evaluate the past actions in the HLCNF and include other adjacent forests and BLM lands that have affected motorized users and ascertain an overall picture of what impact these past actions have had. CBU requests that a programmatic EIS be completed by Region 1 on the cumulative economic and social impact that the

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closures proposed in all forest management plans and travel plans in Region 1 are having on small communities, local governments, and rural communities.

Several forest districts across Montana are developing new forest plans and travel management plans. CBU finds no information in the HLCNF Plan proposal alternatives or documents that has been gathered and analyzed to address the impact that the proposed closures in the Helena Lewis and Clark NF will have on forest visitors from other areas of Montana. Many other forest districts have made statements that the impact of the closures they are proposing will have little effect as visitors will be able to drive a short distance to recreate in another forest. With similar closures in many forest districts in Montana going on at this time CBU finds this statement both arbitrary and capricious. [comment end] A complete Programmatic EIS should be completed by Region 1 to address this issue

Has this forest complied with the 2001 3 state OHV Rule and completed a comprehensive trail inventory and analysis prior to this proposed management plan? CBU finds no evidence that the Helena Lewis and Clark National Forest completed a trail condition analysis as required by the O1 3 State Rule. This must be done prior to any travel planning actions. Because your district did not comply with the requirement of the 01 3 State ORV Rule, we believe the proposed closures are therefore arbitrary and capricious.

Even though the proposed forest plan does not address site specific roads and trails, this action when implemented will affect these uses going forward as subsequent travel plans will NOT analyze any of these roads and trails because of the fact the Forest Plan already has determined motorized and mechanized use in these areas is not appropriate or authorized. Even when historic motorized and mechanized use of these areas has been in existence, future planning decisions will be based on this Forest Plan. If the Forest Plan is to determine acceptable or allowable use in an area of the forest, all current roads and trails used by motorized and

mechanized use must be analyzed during the Forest Plan revision. This analysis must be completed so that future decisions on site specific motorized and mechanized use will have gone through the proper NEPA process and the public has an opportunity to comment on the action. Without analysis being completed in this Forest Plan on specific roads and trails in an area deemed inappropriate in this Forest Plan for a specific use, the public will not be afforded the opportunity to comment in the future because the Forest Service will claim the future analysis is not required because the Forest Plan made this decision. A clear violation of NEPA.

In regards to the Elk studies that your district is using in the Forest Plan revision. The science being used is old and outdated. Current motorized and mechanized use in the HLCNF has not affected elk populations. Today Elk

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populations are over target numbers in 64% of the 44 Elk Management Units in Montana yet you close areas for Elk security. Quentin Kujala, FWP Wildlife Management Bureau Chief, stated on December 8th, 2007 at the Elk Summit in Bozeman, Motorized access is important for hunter access and the control of elk population. CBU requests that you address the ability to control the population of elk in your forest through hunting by increasing access by motorized vehicles.

Game retrieval is a very important part of hunting and CBU requests that you make accommodations for game retrieval during the mid-day times.

Studies show that hunter numbers are decreasing, hunter age is increasing and elk populations are increasing and CBU requests that your Forest Plan address these facts. Private property owners are getting fed up with FWPs lack of management of not only elk but wolves. Property owners are removing large areas of land from Block Management in an effort to get FWP to respond to their concerns. The private property owners are seeing an increase of 14% of ungulates moving from federally managed public land to their property. CBU has seen this to be the result of lack of active forest management practices on FS managed land that would have result in increased food source of grass for ungulates. Overgrown forests have resulted in a lack of grass and available food source for these animals and have forced these animals on to the private lands that have been correctly managed. This trend is causing a burden on those ranches and farms that must be addressed. The Helena Lewis and Clark DEIS does not address this situation and in fact exacerbates the problem by reducing multiple use access for recreation and management needs such as fuel load reductions.

Historic use of our federally managed public land must be preserved. If resource damage is documented and attempts to mitigate the documented damage have failed, then and only then should closures be an option. I see no attempt by this forest to work cooperatively in identifying and mitigating areas of concern including fuel load buildup, access for physically challenged, and trail or road maintenance.

Montana is currently experiencing the highest rate of suicide in the nation. The opioid epidemic in Montana is out of control. Our mental health system is not adequate to address this crisis and many communities are suffering. Is the Forest Service a partner in this situation? They should be. Is the Forest Service responsible for this situation? They could be?

A recent study conducted by Colorado has shown a direct connection between mental health and a connection to the outdoors. The Montana legislature passed HJ 13 in 2015 to look at the amount of roads closed by the Forest Service and BLM in Montana since 1995. The final report of this study can be found at:

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<http://legis.mt.gov/content/Committees/Interim/2015-2016/Committees/Topic/13/13-finalreport.pdf>

According to this report the Forest Service has closed nearly 22,000 miles of roads in Montana since 1995. Each and every one of these roads was important to some individual or family for not only recreation but for subsistence like food, wood providing supplemental heat source, or jobs. In Colorado and the connection between mental health and access to outdoor recreation and activity the state has initiated the idea of providing

patience with an actual prescription, not for drugs, but for engagement in outdoor activity. The Colorado information is included in the supporting documentation with this comment cover sheet.

Also included with this cover document comment is the supporting information compiled by the Capitol Trail Riders Association located in Helena. I that information you will find many studies and information CBU requests the Forest Service analyze this information and include it in the administrative record.

In closing, a majority of voters in Montana want more active management of our public land and less smoke from wildfires. A majority of voters in Montana don't want any additional wilderness designated. This vote resonates from every citizen in Montana. Please follow the wishes of the majority of the public when deciding the future use of this forest.

We live in an uncertain world today, one of turmoil and fighting around the globe. A federal agency such as the Forest Service has the ability and an obligation to provide people with a place to safely recreate and escape the problems of their everyday lives. The forest in Montana is a special place to a vast number of people and the ability for all people to enjoy this area is of the utmost importance.

Segregation of people and discrimination should not be supported by your agency yet this is what you are proposing to do. Bringing people together in responsible shared use recreation and responsible resource management must be the direction that your agency takes. Locking people out of the land that we have entrusted you to manage for our use and enjoyment is not acceptable.

Please accept these comments and the supporting documents from CBU in regards to the Helena Lewis and Clark National Forest Plan revision DEIS.

Thank you,

Kerry White Executive Director

Addendum to CBU DEIS comment

The HLCNF plan revision is full of reference to climate change and many decisions are being made with the effects of climate change as a factor.

The Executive Order signed by President Trump, EO#13783 signed on 3-28-17, specifically directs federal agencies on the use of Climate Change in NEPA documents.

Specifically Section 3 (a) (i) Revoking EO#13653 and

Section 3 (c) The CEQ shall rescind its final guidance entitled Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, which is referred to in Notice of Availability, Fed. Reg. 51866 (August 5, 2016)

This new executive order clearly directs federal agencies to reframe for the use of climate change in the development of NEPA documents on significant actions. The HLCNF plan revision is a significant action. The HLCNF has developed a NEPA document in regards to this significant action. The HLCNF is in violation of Executive Order #13783 by including reference to climate change in this document.

Please remand the DEIS in order to comply with Executive Order #13783 and remove all reference to climate change in the NEPA document and adjust all actions relevant in the DEIS that were related to climate change before re-release of a new NEPA document and alternatives.