The Helena-Lewis and Clark Forest Plan Objections Guide

The objection process is the last chance for the public to provide feedback on a national forest plan revision before the final plan is signed and takes effect. The intention of the process is to propose solutions, or remedies, and decrease litigation after the plan is signed.

Update July 27, 2020:
The written objections submission period closed on July 20. The Forest Service is now reviewing all objections and will soon publish a notice of objection. If you did not object but would like to be an interested party, you have 10 days to file a request to participate as an interested party.

1) Your contact information, either your phone or email address are required. Be sure to indicate if you are the lead commenter commenting on behalf of a group
2) Make sure to specify that you are objecting to the Helena-Lewis and Clark National Forest 2020 Land Management Plan, Forest Supervisor Bill Avey.

As part of your objection, be sure to:

- Identify the issues or parts of the plan to which the objection applies
- Concisely state what your objection is
- State what your proposed remedy or solution to the objection is
- Draw a relationship between your objections and your previous comments. If you need help finding your previous comments, please contact Zach Angstead at zangstead@wildmontana.org.

MWA has provided a list of issues that we feel are important to incorporate in your objections, and we encourage you to focus on 3 or 4 issues that are most important to you.

We also highly encourage you to individualize your objections.

The objection process can be intimidating. If you follow this guide and remember that Montana Wilderness Association is here to help you write your strongest objection, we can affect the final outcome of the plan and compel the Forest Service to do more for protecting our wildlands.

Feel free to send a draft of your comments to MWA’s central Montana field director, Zach Angstead, at zangstead@wildmontana.org for a look-over prior to submission. He can help identify if parts are missing or if more clarity is needed. If you want to visit with Zach, he is making himself available during the day to talk about your objection. If you are interested in talking about MWA’s specific objections and recommendations for plan components you can call Zach at 406-899-9955.

MWA’s Objections to the Final Draft of Helena-Lewis and Clark Forest Plan

Big Snowies Wilderness Study Area (WSA)
Issue: The Big Snowies is the most intact and pristine island range of central Montana. The Forest Service recognizes this by recommending 66,000 acres for Wilderness designation, adjoining the 32,000-acre Grandview Recreation Area. This is a significant step for a rare wild landscape. However, the recommended Wilderness boundaries belong further west to include Crystal Cascades, the Ice Caves, and the steep wildlands dropping into Neil Creek. The boundaries as drawn fail to preserve the wild character of the WSA.

Objection: I object to the boundaries for the recommended Wilderness and Grandview Recreation Area in the Draft Record of Decision (DROD).

Remedy: The boundaries of the recommended wilderness and Grandview Recreation Area should change in order to maintain the wilderness character of the Wilderness Study Area and create opportunities to improve and build collaborative solutions. The recommended wilderness boundaries should include Neil Creek, Blake Creek and Timber Creek. The Crystal Cascades Trail and Uh horn trail should also be included in the RW. The Grandview trail and trails west of West Peak should be included in the Grandview Recreation Area (GRA). The GRA should also encompass the area currently used by snowmobiles northwest of Jump Off Peak. These boundaries will not diminish potential or character of the WSA preserved in the 2004 collaborative agreement/travel plan.

The Badger-Two Medicine
Issue: The Blackfeet have proposed to fully protect the wild character and long-standing traditional uses of this area, which borders the Bob Marshall Wilderness and Glacier National Park. The Forest draft plan falls short of full protections sought by the Blackfeet Tribe. MWA stands with the tribe in its request that the Forest Service apply protective standards similar to recommended Wilderness, standards that fully protect the Badger’s cultural values and enable the Blackfeet to shape management decisions along with the Forest Service. 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.

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: The Middle Fork Judith was designated a Wilderness Study Area in 1977. The Forest Service is mandated to maintain the wilderness character of the area and its potential for designation. The plan components for the Little Belts GA do not protect the wilderness character and potential for future designation of Middle Fork Judith WSA. No portion of the Middle Fork Judith Wilderness Study Area was recommended for Wilderness and the rationale provided was that "motorized trails and private inholdings accessed by open roads impact solitude." (Appendix E FEIS pg 314). The remedy (Alt D) proposed for Recommended Wilderness by MWA, does not include motorized trails. The blanket suitability of mechanized use in WSA’s poses a threat to the wilderness character and potential for future designation of the WSA.

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, which does not impact existing motorized use and protects the wilderness character and potential of the Middle Fork Judith WSA.

North Crazy Mountains
Issue: The Crazy Mountains are sacred to the Apsáalooke (Crow people), whose leaders have asked the U.S. Forest Service to fully protect this range. The Forest Service needs to honor that cultural relationship the tribe has to this range and fully protect it for its cultural and ecological values. 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 lack of plan components that acknowledge the cultural significance of the Crazies to the Crow people and to the Semi-Primitive Non-Motorized allocation for the Loco Mountain area.

Remedy: The plan should include stronger and more specific plan components that recognize and support the significant value of the Crazies to the Apsáalooke. In addition, the Loco Mountain IRA should be a Primitive area in order to recognize and protect the existing wildlife and cultural values. As Primitive ROS setting no existing uses would be affected.

The Elkhorns Wildlife Management Unit (WMU)
Issue: The Elkhorn Mountains are the nation’s only wildlife management unit, providing a refuge for elk, deer, moose, wolverines, lions, and bears. The draft decision weakens the foundational principle of putting wildlife before development and fails to protect the historic wilderness character of the 70,000-acre roadless heart of the Elkhorns Wildlife Management Unit (WMU).

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: The standards and guidelines should support the principles of the WMU and should be the foundation of management of the Elkhorn WMU. Uses that take place in the WMU should be compatible with wildlife and habitat priorities. In addition, there should be an evaluation for recommended wilderness in the qualifying wildlands of the Elkhorns.

**Continental Divide and Upper Blackfoot area**

Issue: We’re pleased that the Forest plan recommends Electric Peak and Nevada Mountain for Wilderness protection and includes standards to conserve wildlife habitat and movement corridors along the Divide. But the plan limits application of those standards to a tiny fraction of the Divide.

Objection: We object to the limited geographic area that applies standards to protect wildlife habitat.

Remedy: Wildlife conservation standards should apply to the entire Continental Divide. The final plan should also protect the existing wildland character of Black Mountain, Sweeney Creek, and Jericho Mountain, which are within the South Hills Recreation Area outside Helena.

**Primitive Recreation Opportunity Spectrum (ROS)**

Issue: Historically, primitive areas have been protected for traditional foot and stock use and managed to retain their large, remote, wild and predominantly unmodified values. It is essential that the HLC manage Primitive ROS areas to meet their desired future conditions, retaining wild, remote and unconfined values. Therefore, a final decision cannot be made for mechanized suitability in Primitive ROS settings.

Objection: I object to the Forest Service classing mechanized use as “suitable” in primitive areas outside of recommended Wilderness and Wilderness.

Remedy: The suitability component for mechanized use (FW-ROS-SUIT-02) should be removed from Primitive ROS settings, and site specific decisions for primitive ROS areas should be made.

**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 Draft ROD fails to provide forestwide direction necessary to guide managers and ensure required WSA conditions are met; that wilderness character and potential remain undiminished by changing conditions, activities, permits, developments, leases, etc.

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: Plan components including Desired Conditions, Standards, and suitability must be changed to reflect the statutory language and protections of the Montana Wilderness Study Act of 1977. The same wilderness character and potential as RWAs are at risk and must be protected in the two WSAs on this forest.