From: Kendall Flint  
President, Glacier-Two Medicine Alliance

To: Bill Avey  
Supervisor, Helena-Lewis and Clark National Forest

Re: Helena-Lewis and Clark National Forest (HLC NF)  
Draft Revised Forest Plan (DRFP) and Draft Environmental Impact Statement (DEIS)

Date: October 5th, 2018

Dear Mr. Avey,

Hello from East Glacier Park and the glorious Badger-Two Medicine country!

On behalf of the Glacier-Two Medicine Alliance (GTMA), its members and supporters, we offer the following formal public comments on the Helena-Lewis and Clark National Forest (HLC NF) Draft Revised Forest Plan (DRFP) and Draft Environmental Impact Statement (DEIS) that were released on June 8, 2018.

The Glacier-Two Medicine Alliance (GTMA) is a federally registered non-profit organization focused primarily on conservation of the Badger-Two Medicine area. GTMA is "Dedicated to the protection, stewardship, and shared enjoyment of the culturally- and ecologically-irreplaceable wildlands of the Badger-Two Medicine and its interconnected ecosystems." And it is GTMA's vision that "A child of future generations will recognize and can experience the same cultural and ecological richness that we find in the wildlands of the Badger-Two Medicine today."

Last year (March, 2017), GTMA submitted comments to the HLC NF on the Proposed Action - Revised Forest Plan that was released in November, 2016. Our comments asked the Forest to fully protect the wilderness-ecosystem values of the Badger-Two Medicine area as well as the cultural and spiritual values of the Blackfeet Traditional Cultural District (TCD) that encompass nearly all of the Badger-Two Medicine area. Our following comments on the DRFP and DEIS reiterate our commitment to the protection of these values.
The Draft Revised Forest Plan (pg. 167) designates the Badger-Two Medicine area as a "Special Emphasis Area". GTMA fully supports this designation as it indicates that the cultural, religious, and ecological values present in the Badger-Two Medicine area require a unique management approach.

In reviewing the Draft Revised Forest Plan and its associated DEIS, GTMA has identified issues that are important to us on a forest-wide level as well as on a Badger-Two Medicine area-specific level. In our comments below, we first discuss forest-wide (FW) issues and then Badger-Two Medicine (BTM) area-specific issues. For each issue, we provide our recommendation that we hope the HLC NF will adopt and implement in creating the final revised forest plan.

Forest-wide (FW) Issues / Recommendations
---------------------------------------------------------------------------
FW Issue #1:

Best DEIS Action Alternative for Management of the Helena-Lewis and Clark National Forest (HLC NF)

FW Recommendation #1:

GTMA asks the HLC NF to select Alternative D of the DEIS for the final revised forest plan. GTMA supports Alternative D because this alternative best identifies the areas with wilderness character, and identifies the appropriate and greatest number of recommended wilderness areas (16) and acres (474 K) of recommended wilderness. It correctly assigns a Recreation Opportunity Spectrum (ROS) setting of "Primitive" to approximately 1.2 million acres (42% of the total forest) for both winter and summer. Critically, it would also appropriately assign an ROS of Primitive to the Badger-Two Medicine area for both summer and winter. We fully support the ROS classification of "Primitive" for the Badger-Two Medicine area.

We also support the choice of Alternative D because it creates additional recommended wilderness areas in portions of the HLC NF east/south of Helena that may assist in grizzly bear connectivity between the Northern Continental Divide Ecosystem and Greater Yellowstone Ecosystem.

GTMA also supports Alternative D because it prohibits both motorized and mechanized travel in recommended wilderness areas, (FW-RECWILD-SUIT-01), and because it prohibits the use of motorized and mechanized equipment for administrative/restoration work in recommended wilderness areas, (FW-RECWILD-SUIT-03). We believe these prohibitions are important in maintaining the wilderness characteristics of the recommended wilderness areas and increase the potential for these areas to become federally-designated wilderness at some future time.
FW Issue #2: Grizzly Bear Habitat Management on the Helena-Lewis and Clark National Forest (HLC NF)

FW Recommendation #2:
All of the DEIS action alternatives would adopt the Final NCDE Grizzly Bear Conservation Strategy and the Forest Habitat Amendments for the Helena and Lewis & Clark National Forests, (Appendix I of the Draft Revised Forest Plan). GTMA fully supports the decision of the HLC NF to incorporate the forest plan components for managing grizzly bears and their habitat that are specified in Appendix I, (Draft Revised Forest Plan), into the final revised forest plan regardless of whether the NCDE grizzly bear population has been delisted or not.

Additionally, GTMA supports Alternative D because it appropriately assigns a Recreation Opportunity Spectrum (ROS) classification of "Primitive" to more of the HLC NF than other alternatives. This means Alternative D appropriately provides more grizzly bear habitat security, (secure core), than other alternatives. Providing secure habitat for grizzly bears in the Primary Conservation Area on the HLC NF is very important to GTMA.

FW Issue #3: Wild and Scenic Rivers Eligibility in the Helena-Lewis and Clark National Forest (HLC NF)

A 2015 Wild and Scenic Rivers Eligibility Study carried out by the HLC NF identified 45 rivers/streams, (including 10 in the Badger-Two Medicine area), that were eligible for consideration as Wild and Scenic Rivers under the Wild and Scenic Rivers Act of 1968, (see Table 26, pg. 72-75, HLC NF Draft Revised Forest Plan).

FW Recommendation #3: Without specifically endorsing Wild and Scenic River designation beyond the eventual context of a Blackfeet-initiated permanent-protection classification, GTMA asks that the HLC NF manage these 45 named rivers/streams in the final revised forest plan to preserve the pristine qualities that define their eligibility for inclusion in the Wild and Scenic Rivers system on National Forest System lands. GTMA asks the HLC NF to apply the interim protection measures defined in Table 27, (pgs. 76-78), of the HLC NF Draft Revised Forest Plan to these 45 named rivers/streams to protect the Outstanding Resource Values (ORVs) that have been identified.

Badger-Two Medicine (BTM) Area Issues / Recommendations

Badger-Two Medicine (BTM) plan component RM-BTM-STD-01 states that "The uses of this area must be compatible with desired conditions and compatibility shall be determined through
government-to-government consultation." GTMA supports the use of this "compatibility language" in plan component RM-BTM-STD-01.

Badger-Two Medicine (BTM) plan component RM-BTM-STD-02 states that, "Management activities within the Badger-Two Medicine area shall not pose adverse effects to the Badger-Two Medicine Traditional Cultural District." This first sentence of the Standard is appropriate, but the Standard is missing additional language describing the required consultatory or co-management role of the Blackfeet Nation in assessing potential impacts of management activities on the BTM Traditional Cultural District (TCD), in assessing potential incompatibilities relative to the purposes of the TCD, and in directing management activities such that they compatible with TCD values. This language would/should likely refer to or embody required consultation as defined in the National Historic Preservation Act, Section 106, addressing proposed activities and projects on historic properties recognized by the Advisory Council on Historic Preservation (ACHP). GTMA believes that the Blackfeet Nation must have an oversight role in assessing proposed management-activity TCD-related impacts, (see recommendation below).

BTM Recommendation #1: Badger-Two Medicine plan component RM-BTM-STD-02, (Draft Revised Forest Plan, pg. 172), should state that management activities proposed for the BTM area must be compatible with the purposes of the Traditional Cultural District (TCD) and that compatibility shall be determined through government-to-government consultation between the Forest Service (HLC NF) and the Blackfeet Nation.

The Forest Service and the Blackfeet Tribe should formalize the "government-to-government consultation process" through an established protocol or Memorandum-of-Understanding (MOU). The development of this formal protocol/MOU should be stated as a Badger-Two Medicine plan component GOAL.

BTM Issue #2: Desired Recreation Opportunity Spectrum (ROS) Setting for the Badger-Two Medicine (BTM) Area

The current ROS setting for the BTM area is "Semi-primitive, Non-motorized". This setting prohibits motorized travel in the BTM area but allows mechanized travel, (including mountain bikes), in the BTM. To provide a higher level of protection for both the cultural and ecological (wildland) values of the BTM area, GTMA asks that the final revised forest plan for the HLC NF assign a ROS classification of "Primitive" to the Badger-Two Medicine area for both the Summer and Winter seasons.

BTM Recommendation #2: The following statement should be added as a Desired Condition or Standard to the plan components for the Badger-Two Medicine Area:

"Summer and Winter recreation opportunities and experiences within the Badger-Two Medicine area are consistent with the ROS classification of Primitive."
BTM Issue #3: Types of Travel Permitted in the Badger-Two Medicine Area, (Blackfeet Traditional Cultural District)

Motorized travel has been prohibited in the Badger-Two Medicine area since the signing of the Record of Decision for the Badger-Two Medicine Travel Management Plan in March 2009. The prohibition on motorized travel in the Badger-Two Medicine area has played a critical role in protecting both the cultural/religious and wildland values of this area.

Badger-Two Medicine (BTM) plan component RM-BTM-DC-01, (Draft Revised Forest Plan, pg. 172), continues to prohibit motorized travel in the BTM area but allows mechanized travel, including travel with bicycles. In a comment letter to the HLC NF in March 2017, the Blackfeet Tribal Historic Preservation Office (THPO) stated that they consider mechanized travel/transport in the Badger-Two Medicine area to be an unsuitable modern development and intrusion upon the integrity of the Badger-Two Medicine Traditional Cultural District (TCD). Blackfeet traditionalists consider the Badger-Two Medicine area to be a sacred landscape, i.e., a holy place, with both cultural and religious significance.

GTMA believes that allowing mechanized transport/travel, including mountain biking, in the Badger-Two Medicine TCD fails to acknowledge or to promote respect for the religious and cultural significance of this wild, sacred landscape. The Badger-Two Medicine TCD is not just another "outdoor gymnasium". The Blackfeet THPO clearly expresses that travel in the Badger-Two Medicine area should primarily be on foot or by pack animal, (horse, mule), so that one may engage in quiet, "contemplative recreation" that fully respects the cultural and religious significance of the landscape. GTMA fully concurs with this Blackfeet viewpoint on the types of travel that should be allowed in the Badger-Two Medicine area, and believes that there needs to be clear Suitability statements in the forest plan components for the Badger-Two Medicine area which prohibit both motorized and mechanized travel in this area, (see recommendation below).

BTM Recommendation #3: The following Suitability statements should be added to the forest plan components for the Badger-Two Medicine area:

"Motorized recreation travel is not suitable in the Badger-Two Medicine area."

"Mechanized recreation transport is not suitable in the Badger-Two Medicine area."

BTM Issue #4: Potential Non-Commercial Timber Harvest in the Badger-Two Medicine Area

Forest Plan component RM-BTM-SUIT-01 prohibits commercial timber harvest in the BTM area but allows timber harvest for "habitat restoration, hazardous fuel reduction, and to support tribal treaty rights."
GTMA believes that plan component RM-BTM-SUIT-01 allows too much discretion for non-commercial timber harvest in the Badger-Two Medicine area. We believe the final forest plan should contain additional plan components for the BTM area that clarify constraints on how and when non-commercial timber harvest may occur in the Badger-Two Medicine area, (see recommendations below).

BTM Recommendation #4: Additional plan components, (Standards and Guidelines), are needed for the BTM area that clarify under what conditions the HLC NF or Blackfeet Tribe may undertake timber harvest in the BTM area. At the very least, there should be a Standard that requires government-to-government consultation between the HLC NF and Blackfeet Tribe, as well as a public comment process, before any project involving non-commercial timber harvest is approved. Another Standard requiring that any timber-harvest project be compatible with protection of the Blackfeet Traditional Cultural District (TCD) and the area's Desired Conditions should also be considered.

BTM Issue #5: Additional SUITABILITY Plan Components for the Badger-Two Medicine Area

The Draft Revised Forest Plan includes only one Suitability plan component for the BTM area, (related to timber harvest), giving the HLC NF considerable discretion in making suitability determinations for other resources and uses. In our 2017 comment letter on the HLC NF Proposed Action, (revised forest plan), GTMA included a long list of specific SUITABILITY plan components that we believed are appropriate and necessary for the protection of both the cultural and ecological values present in the Badger-Two Medicine area. We ask that the HLC NF re-consider adding some of these Suitability statements to the plan components for the Badger-Two Medicine area, (see recommendation below).

BTM Recommendation #5:

Additional Suitability of Lands (RM-BTM-SUIT) Plan Components that Should be Added for the Badger-Two Medicine Area:

The Badger-Two Medicine area is suitable for habitat restoration activities, (such as whitebark pine restoration), where the outcomes will restore the natural ecology of the area.

Vegetation management activities, (such as prescribed fire), are allowed in the Badger-Two Medicine area for reasons specifically designed to maintain the natural ecology and the desired conditions associated with the area.

The Badger-Two Medicine area is not suitable for new trail construction. Maintenance and/or reconstruction of existing system trails is permitted.
The Badger-Two Medicine area is not suitable for new or expanded livestock grazing allotments.

The Badger-Two Medicine area is not suitable for mineral or energy leasing or exploration, or for the development of leasable or locatable minerals.

The Badger-Two Medicine area is not suitable for commercial wind, solar, or geothermal projects.

The Badger-Two Medicine area is not suitable for hazardous fuel reduction projects/activities.

The Badger-Two Medicine area is suitable for the restoration of wild bison.

BTM Issue #6: Restoration (Re-introduction) of Bison to the Badger-Two Medicine Traditional Cultural District (TCD)

Prior to the twentieth century, the American Bison (Buffalo) played an essential role in providing food, shelter, and clothing for the Blackfeet people. The animal also played an important role in traditional Blackfeet cultural and religious practices. It is therefore completely understandable that the Blackfeet Nation would feel that the Badger-Two Medicine Traditional Cultural District is not complete without the re-introduction of bison to the TCD. In its 2017 letter to the HLC NF on the Proposed Action for the revised forest plan, the Blackfeet Tribal Historic Preservation Office stated the following, (as a requested Desired Condition):

"The Badger-Two Medicine area shall be managed to honor the unique relationship between the Blackfeet people and the American Bison..." This means "restoring buffalo back to the Badger-Two Medicine ... to graze as free-roaming wildlife, thereby making the Traditional Cultural District more fully culturally restored and ecologically balanced..."

GTMA fully supports the vision of the Blackfeet Nation to restore bison (buffalo) to the Badger-Two Medicine Traditional Cultural District. The Desired Conditions for the Badger-Two Medicine area in the current HLC NF Draft Revised Forest Plan include no references to the Tribe's stated vision regarding the return of bison to the Badger-Two Medicine area. This omission should be corrected, (see recommendation below), in the HLC NF Final Revised Forest Plan.

BTM Recommendation #6: A Desired Condition should be added to the forest plan components for the Badger-Two Medicine area that acknowledges the special place of the Bison in Blackfeet history, culture, and spirituality and makes a commitment to restoring bison on the Badger-Two Medicine landscape during the lifetime of the HLC NF Final Revised Forest Plan.

In this regard, GTMA supports the Desired Condition for bison restoration that was suggested in the 2017 comment letter by the Blackfeet Tribal Historic Preservation Office on the Proposed Forest Plan.
BTM Issue #7: Blackfeet Nation Co-Management (Co-Stewardship) of the Badger-Two Medicine (BTM) Area

GTMA has always believed that the Blackfeet Nation should have an essential role in the management and stewardship of the culturally- and ecologically-irreplaceable wildlands of the Badger-Two Medicine Traditional Cultural District. But the HLC NF Draft Revised Forest Plan does not provide strong direction for the cooperative management of the Badger-Two Medicine area between the HLC NF and the Blackfeet Nation. GTMA believes that the HLC NF Plan Revision process should provide an avenue to advance this objective. We therefore offer the following recommendation for the Final Revised Forest Plan of the HLC NF:

BTM Recommendation #7: Co-management (co-stewardship) of the Badger-Two Medicine Traditional Cultural District by the HLC NF and the Blackfeet Nation should be included as an achievable plan component (a Desired Condition statement) for the Badger-Two Medicine area. If not stated as a Desired Condition, another option would be to include co-management as a BTM plan component Goal.

We, the Glacier-Two Medicine Alliance, appreciate the opportunity afforded by the Helena Lewis & Clark National Forest to provide these comments on the Draft Revised Forest Plan and Draft Environmental Impact Statement. We look forward to working with the Forest to ensure development, adoption, and implementation of a final revised forest plan that fully protects both the wilderness and cultural values of the Badger-Two Medicine area.

Sincerely, for the Glacier-Two Medicine Alliance,

Kendall Flint, MD
President, Glacier-Two Medicine Alliance
PO Box 181
East Glacier Park, MT 59434
(406)226-4699
kendall@GlacierTwoMedicine.org