



Mr. Duane Harp, District Ranger
Helena Ranger District
2001 Poplar Avenue
Helena, MT 59601

March 23, 2010

SUBJECT: MacDonald Pass Hazard Tree Removal Scoping Comment

Dear Mr. Harp,

We offer the following scoping comment regarding the proposed MacDonald Pass Hazard Tree Removal Project. The Helena Hunter and Angler Association (HHAA) has been actively involved in natural resource issues surrounding the Helena area, and we take a particular interest in the Continental Divide country because it shapes our landscape, defines survival opportunities for a variety of wildlife species and provides an important anchor for our hunting life-styles.

The Helena Hunters and Anglers Association is dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor hunting and fishing opportunity for all citizens to share equally.

As you know, we were keenly involved with the proposed biathlon project, which was proposed to occur in the same location as the now proposed hazardous tree removal project. Part of the biathlon proposal was to widen and straighten ski trails via a timber removal project along existing ski trails, because the trails had to be “modified” to accommodate skate skiing and “allow for the use of grooming machines” (Final Biathlon EA 2-12). We commented at every stage of that project, bringing forth many issues of concern to our membership.

Ultimately, since the Helena Forest declined to adequately consider our concerns, we were compelled to engage in litigation in order to obtain redress. In that effort, the District Court in Missoula granted us summary judgment (CV 08-162-M-DWM) on the following points, in July 2009, all of which are still relevant:

“wetlands, possible impacts on wildlife habitat connectivity, the cumulative impacts analysis, ... elk standard, and ... lynx standard.”

In the forthcoming analysis of this project, please explain in detail, how each of these issues has been resolved. Please provide in the EIS or EA all monitoring data, maps displaying the location and status of each topic as of the date of the analysis. Please provide up to date information. Please provide these maps in the EIS/EA-rather than in a file in your office), and explain how each of these points are or are not comparable to their status as of July 2009. As of 2010, conditions on the ground have changed with reductions in forest cover for elk hiding cover and removal of extensive swaths of adjacent private timber. As a result of this declining forest cover, we suspect that with regard to:

- Wetlands - more surface water will be present since water uptake by trees has declined, and thus wet areas may be even more abundant than previously in the project area. Please provide expert hydrological evaluation and literature review on this subject. Given that there may be more water in more places, and the fact that existing trails cross streams 14 times, what will be the impact of the project on water quality and wetlands?
- Wildlife habitat connectivity – must be maintained. How will implementing the proposed commercial timber sale and re-opening of naturally reclaimed routes affect habitat connectivity in this very narrow segment of public land?
 - Wildlife habitat connectivity at the immediate project site may remain at status quo if trails are not expanded and naturally reclaimed old roads are not reopened for commercial timber removal;
 - Wildlife habitat connectivity along the Continental Divide linkage corridor will be affected by HNF commercial timber sales including Elliston Face, Telegraph Creek, Upper Tenmile – particularly if road densities increase or closures are not enforced;
 - Wildlife habitat connectivity at specific locations will be diminished as habitat and security conditions continue to erode – such as incremental creep of trail and road expansions along the divide, or such as at the north end of the Nordic trail in Sweeney Creek where the HRD extensive illegal ATV trail proliferation is allowed to continue on the HNF. This is occurring immediately north of the proposed project – photographs and excerpted memo of April 24, 2004 from Montana Fish, Wildlife and Parks (MFWP) to Helena Ranger District is attached (Attachment A).
- Cumulative impacts – have increased and must be analyzed as
 - private landowners dramatically alter forest cover and ground conditions on their adjacent lands
 - Helena Forest projects accumulate and proceed along the continental divide and areas surrounding MacDonald Pass (see Attachment D - table developed by MFWP of some cumulative impacts that were described as influencing this area).
- Elk hiding cover – has decreased; implementing the proposed commercial timber sale that would open human travel conduits through the forest would exacerbate the circumstances. The elk standard for hiding cover is not being met for the Greenhorn Elk Herd Unit. Elk occur yearlong in the project area, as do moose and mule deer. Describe the amount and distribution of big game hiding cover, security and winter range available

in the area currently; how much will be available during project implementation and how much will exist post project. Describe the methodology use to determine these figures.

- Lynx standard - is not being met. The site of the proposal is classified as critical lynx habitat. The court previously stated in HHAA et al. v. Tom Tidwell: “The [lynx] standard applies, and connectivity must be maintained regardless of whether lynx are currently residing in the area.” Please explain how the project will maintain circumstances for lynx if naturally reclaimed roads are opened up for a commercial timber sale.

In addition to the above continuing concerns which were upheld in Federal District Court, we would appreciate it if the following issues were also addressed during analysis of this project:

1. Threatened and Endangered Species. Both lynx and wolves have been documented in the project area. Photos of actual lynx and wolves occurring in the project area or immediate vicinity are attached (Attachment B). In addition, the presence of lynx have been documented during extensive winter searches in 2007, 2008, 2009, and 2010 for wildlife tracks, scats, and hair by professional wildlife biologists (Wild Things Unlimited 2007, 2008, 2009). It is our understanding that this information has been submitted to the Helena National Forest. Please include all of these reports in the project record. A map of lynx presence in the area from Wild Things Unlimited, showing the importance of the Continental Divide and the MacDonald Pass area to lynx, is attached (Attachment C). The MacDonald Pass ski trails occur in critical lynx habitat, within the range of a previously established wolf pack, and within a wildlife linkage corridor that may be vital not only for lynx but used by grizzly bear and wolves as well. How will the proposed commercial timber sale improve circumstances for these species? How will opening up 6.2 miles of roads that have been closed for more than 40 years NOT affect habitat or linkage for these species? The proposal calls for use of for heavy equipment on 6.2 miles of road to remove timber. Please describe recent monitoring efforts and results for grizzly bears and gray wolves, both threatened indicator species in the Helena Forest Plan.

3. Sensitive Wildlife Species. Wolverine are known to occur in the immediate area of the proposal. The presence of wolverine have been documented during extensive winter searches in 2007, 2008, 2009, and 2010 for wildlife tracks, scats, and hair by professional wildlife biologists (Wild Things Unlimited 2007, 2008, 2009). It is our understanding that this information has been submitted to the Helena National Forest. Please address the circumstances for all sensitive species that may occur on or near Montana’s Continental Divide. Describe recent monitoring efforts and results for sensitive species in this portion of the Continental Divide.

4. Management Indicator Species. Describe monitoring for management indicator species that has occurred as mandated by the Forest Plan, or lack thereof, for populations of MIS species. Indicator species have been identified for those species groups whose habitat is most likely to be changed by Forest management activities. Martens, the management indicator species for the “mature tree dependent group type” on the Helena National Forest, were located within this forest type within the project area, in 2007 and 2008, by Wild Things Unlimited. How will the project maintain habitat for marten?

5. Old Growth Forest. Describe the distribution and amount of old growth in each 3rd order drainage, the methodology used to define old growth, historic levels of mature and old growth forest, and the levels of these forest types to sustain viable populations of dependent wildlife. How will the project affect the future of old growth and its recruitment, and how will dependent wildlife species be affected? Please describe monitoring results for goshawks and pileated woodpeckers, both old growth indicator species as described in the Forest Plan.

6. Travel management. The Divide Travel Analysis has not yet been completed. Hundreds and hundreds of miles of open roads occur along the wildlife linkage zone of the Continental Divide and are compromising wildlife habitat. The current travel plan map (as of March 2010) shows that the project area is closed to motorized use from December to May 15 for “Wildlife winter and spring range”, which suggests that this management closure benefits wildlife. However, this is a closure in name only since motorized vehicle use and substantial skier use occurs within the area. Snowmobile groomers travel on approximately 10 miles of routes multiple times per week during the winter, and microwave, cell phone and utility towers are maintained and monitored using snowmobiles on Road #1802 (referenced by the HNF as the “Microwave Road”) throughout the winter. Therefore, wildlife is being regularly exposed to motor vehicle use in this area that is closed officially for “WILDLIFE SECURITY” during the winter, and at the same time the Microwave Road is open to motorized use the other 6½ months per year. In addition, the ski trails receive up to a few hundred people per day in the winter according to the Nordic Ski Club, and an unknown amount of use in the summer. How will the proposed commercial timber sale contribute to wildlife security of this area? Particularly if old reclaimed roads are pressed back into service for a commercial timber sale. Please describe all consequences to security for wildlife occurring in or near the proposal.

7. Wildlife Linkage. The proposed commercial timber sale is being proposed in the only strip of public land that links the crest of the Continental Divide in a north/south direction across Highway 12. This isthmus of Helena Forest land narrows down to only 1½ miles. How will the proposed commercial timber sale contribute to the ability of the landscape to provide functional wildlife linkage?

8. Soils. All landscape productivity originates with the soil. Soils are easily damaged. Maintaining soils requires avoidance of mechanical destruction, positive conditions for soil microbes to function, accumulation of organic matter necessary for soils to build. Please describe how these conditions will be met so that soils can be improved.

9. Weeds. Noxious weeds are a bane to native wildlife forage. What species of noxious weeds occur in the project area? Provide a map of their distribution. How will the project influence their spread and impact native vegetation communities? How will weeds be prevented on the area and how will that be assured?

11. Cumulative Impacts. In order to honestly address issues of cumulative impacts to natural resources along the Continental Divide please list all projects that the Helena National Forest has been involved with along the Continental Divide from the Nevada Mountain Roadless Area boundary to the Thunderbolt-Little Blackfoot Meadows Roadless Area boundary. MacDonald Pass occurs roughly half way between these roadless areas. Such an analysis would provide

important information regarding activities that have occurred and may or may not have influenced wildlife habitat, watersheds, fisheries and soils. The time frame for this analysis should begin with the initial logging project on MacDonald Pass in the 1970s. Please include all future projects that the HNF may be involved with in the next several years. Particularly helpful would be descriptions of reclamation, monitoring, and post project mitigation that was promised for each project and whether that reclamation, monitoring, and post project mitigation was fully accomplished. A table of some cumulative effects issues that should be addressed is attached (Attachment D).

12. Provide the HNF record of compliance with state best management practices regarding stream sedimentation from ground-disturbing management activities. Are the streams within the project area TMDL streams? Do they flow into TMDL streams? What are the current conditions of the streams in the project area and what will be the expected sedimentation during and after the project? How are TMDL objectives for impaired streams in this area being met? Will the U.S. Army Corps of Engineers be consulted regarding wetlands and stream crossings?

13. Explain monitoring requirements as required in the HNF Forest Plan and present the Forest's record of compliance. Please describe additional monitoring requirements set forth in previous DN/FONSI and RODs throughout the forest and how and whether those requirements have been met.

14. Hunting – How will the hunting public be assured that the proposal will not compromise ethical hunting opportunities, particularly when roads would be cleared for commercial timber harvest and, while not remaining open to motorized use, would none-the-less compromise habitat security via conduits through what was previously more secure habitat? How does the proposal adhere to Presidential Executive Order 13443: Facilitation of hunting heritage and wildlife conservation?

15. Describe how this project interacts with MFWP Elk Management Plan's Habitat Objectives to improve overall habitat effectiveness, decrease elk vulnerability, and improve quality of native forage.

HHAA has questions about process integrity surrounding development and progressive expansion of Nordic trails in the MacDonald Pass area. We are concerned that the proposal for a commercial timber sale along Nordic trails may be a ruse to "super-size" existing routes and perhaps provide stepping stones for the creation of new ski trails since some old, naturally reclaimed roads (non-trail) are being proposed to remove timber.

On Feb 25, 2010, in meeting between several individuals, including HHAA member Gayle Joslin and you (FS District Ranger Harp), you stated that the MacDonald Pass area tree removal scoping would be issued soon. When asked if the trails would be widened to accommodate skate skiing, you said that "all the trails at MacDonald Pass are used for skate skiing now." You said many of the trails once were old logging roads and that they would be pressed into service for tree removal.

In reviewing the 2008 Final Biathlon EA (2-5) that addressed Nordic ski trail expansion of these exact same trails, the document states:

“Maintaining existing trails in their current condition was considered infeasible because a minimum trail width of 20 feet is necessary for routine grooming and trail maintenance, and to provide room for both skate and traditional cross-country ski tracks.” (Final EA 2-5)

This statement clearly indicates that both skate and traditional cross-country ski tracks do not currently exist on all the trails. Thus your statements are at cross-purposes with statements in the EA.

Meeting the objective of removing hazard trees does not require a commercial timber sale which would require use of large machinery and trucks to remove trees. However, it does appear that the use of large machinery and trucks would accomplish similar ends as the 2007 proposal to expand existing trails for routine grooming and trail maintenance” and to “provide room for both skate and traditional cross-country ski tracks.” It was noted that:

“Construction would include clearing, grubbing, and grading for ... improving existing trails....” (Biathlon Final EA 2-12).

Contrary to your statement that ski trails at MacDonald Pass did not need to be widened for skate skiing, because all trails are used for skate skiing now, the following statement in the 2008 Final EA for the proposed biathlon indicates that all trails are not used for skate skiing.

“While all trails are maintained and groomed for classic track skiing, approximately five kilometers are also groomed for skate skiing.” (Biathlon Final EA 3-20)

There appears to be a strong incentive to widen existing trails. If skate skiing is to be maintained on “virtually all trails” then there is an incentive to open the 40+ year old roads that have reclaimed and revegetated themselves, and whose prisms have shrunk, but are being used as ski trails. And thus, a commercial project for Hazardous Tree Removal appears to be a partial ruse to achieve a trail widening objective.

In the forthcoming analysis, please reiterate the “Existing Conditions” as disclosed in the original EA that allowed for construction of the Nordic Ski trail system. Please incorporate, in their entirety, all decision documents that have been associated with development or maintenance of the Nordic Ski trail system since its inception.

From the chronology of activities associated with development of the Nordic Ski trail system as listed in the Final Biathlon EA (3-19, 20) it seems that its development has consistently short-circuited process that should have been used to evaluate impacts. The conclusion might be drawn that yet again the proper process to address expansion of the ski trail system is being thwarted via the “need” for a commercial timber sale in an era when there is a glut of timber and selling trees is extremely difficult in the current market.

In 1978, the Helena Ski Club, in cooperation with the Helena National Forest, designed and constructed (cleared trees and vegetation) six kilometers of ski trail. The following year another

eight kilometers of ski trail were constructed and incorporated into the trail system. In addition, approximately two kilometers of existing logging roads were also designated as MacDonald Pass ski trails.

During the early 1980s, two documents were written that specifically addressed cross country ski trail development. An EA (Cross Country Ski Trail System) was signed by Helena National Forest Supervisor Robert S. Gibson in 1983.

Cross country ski trails on MacDonald Pass have ... not always [been] groomed. In the mid-1990's a group of individuals approached the Helena Forest and expressed an interest to again begin grooming ski trails. (Biathlon Final EA 3-19)

While all trails are maintained and groomed for classic track skiing, approximately five kilometers are also groomed for skate skiing. (Biathlon Final EA 3-20)

Please provide in the analysis an inventory and maps of the Nordic Ski trail system as of

- 1978 when the first 6 km of trails were established,
- in 1979 when 10 more km of trails were constructed and 2 km of logging road were incorporated as ski trails,
- in 1983 when an EA for the system was finally conducted,
- and the status of the trail system at the beginning of each successive decade, including 1990, 2000, and 2010.

Please provide in the analysis:

- a complete list of trail segments - please use field names for segments, such as "Porcupine Loop",
- the length of each segment,
- which of these trail segments are groomed and when that grooming commenced,
- the frequency of grooming.

The above requested documents will help define evolving conditions of the Nordic Ski Trail system over time, and through what processes trail expansion has occurred.

SUGGESTED MODIFICATION TO PROPOSAL

HHAA recognizes the desire to take down hazard trees to reduce safety concerns for Nordic skiers, but such a project must be done without the use of large machinery, including logging trucks, feller-bunchers or other equipment generally used to complete commercial timber sales so as to not further compromise the site with re-opening routes that have been naturally reclaiming themselves over the last 40 years.

It is feasible that habitat connectivity could be improved if hazard trees were dropped and left, thus increasing dead and down woody debris for a host of life that depend on such conditions (lynx, wolverine, marten, ermine, microtines, mycillia, soil microbes, etc.).

Helena Hunters and Anglers Association (HHAA) may be willing to support a non-commercial project that would take down individual hazard trees and

- would leave cut hazard trees in place, or
- would not require removal with machinery any larger than a mechanical “mule” (as has been used on Mount Helena for timber removal),
- would leave woody debris in place to augment wildlife habitat of species that depend on dead and down woody material
- the old roads that now support some of the ski trails are not “re-established”; these old roads have quite effectively rehabilitated themselves through revegetation and shrinkage of the road prism
- carefully planned burning of piles with stringent weed eradication protocols would be acceptable
- no new routes are created.

We would appreciate it if the Helena Ranger District would seriously consider this option and refrain from any commercial timber harvest activity at MacDonald Pass.

Thank you for this opportunity to provide scoping comment on the MacDonald Pass Hazard Tree Removal Proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Frasier", with a stylized flourish at the end.

Stan Frasier, President
Helena Hunters and Anglers Association

Attachment A. **On-going, illegal ATV damage in Sweeney Creek**

(Excerpted from April 26, 2004 Montana Fish, Wildlife & Parks letter to Helena Ranger District)

The existing Nordic ski routes circle through the headwaters of Sweeney Creek, an area that has had substantial disturbance over the past several years. There was a timber sale planned for Sweeney Creek in 1991 that extended into the Porky-Roundwood project of 1995, and a stand improvement/hazard fuel reduction project that took place in October 2001. MFWP has requested that travel management for this area be improved, since at least 1991. We were encouraged that responsible travel management for the Divide would finally be implemented in 2004 however, the project was pre-empted. So, although concern over management of this area has been expressed for several years, additional activities continue to be sanctioned, while at the same time, lack of active travel management is contributing to accumulating impacts to the area. The attached photos of the Sweeney Creek vicinity show an area where the HRD thinned to benefit bitterbrush development for mule deer and moose winter range. However, the result has been proliferation of bare ground, erosion, and vandalism due to expanding motorized recreation.



Attachment B. LYNX AND WOLF KILLED ON MACDONALD PASS

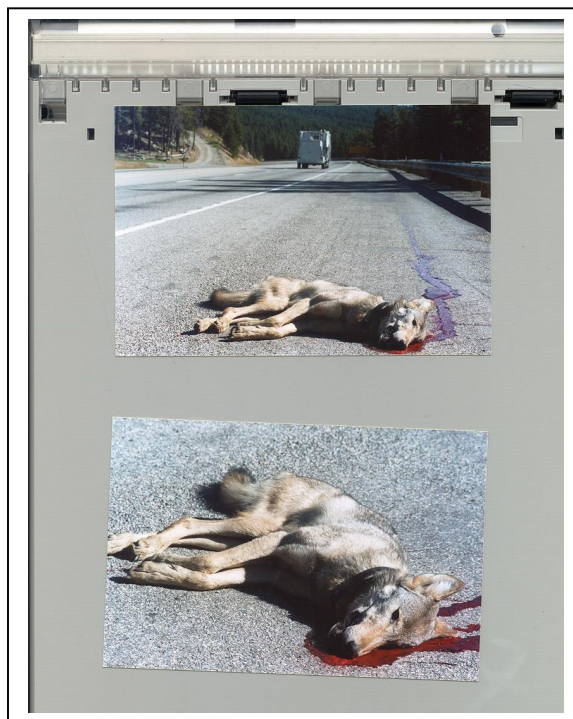
Dead Lynx

July 8, 2003 Received a call from Denise Pengeroth at Helena National Forest who had got a call from Al Christoffersen who saw a dead felid on Highway 12. Thinking it was a lynx, he took a hair sample and will provide to FWP in Missoula. Gayle Joslin retrieved the dead juvenile female lynx on MacDonald Pass, about 2 miles down the west side of the pass, ¼ mile up from the water fountain. UTM (NAD27) Zone 12, 0397429, 5156909 Section SW ¼ 3, T9N R6W.

Measurements: Body length = 29 inch, Ear tufts = 2.0", Front foot pad width = 1", exterior width front foot = 2 ¾", Hind foot pad width = 1", exterior width hind foot = 3"

Dead Wolf

Photos taken of a female wolf hit on MacDonal Pass. She was hit at 10:00 am just on the east side of the Pass near the old Section house. I got there just as she was expiring. A sad thing. She ran into the side of a white sedan being driven by a Carroll College student returning from her home in Deerlodge after the three day weekend. We tried to call USFWS but ended up calling the game warden as the phone was busy at USFWS. Unfortunately on 9/2/02 her number was up. – Steve Platt –



Lynx hit by vehicle near top of MacDonald Pass, July 2003. *(Photos by Gayle Joslin)*

Wolf hit by vehicle near the section house near the top of MacDonald Pass, east side, September 2002. *(Photo by Steve Platt)*

Attachment C. Lynx occurrence along the Continental Divide - Wild Things Unlimited, 2009.

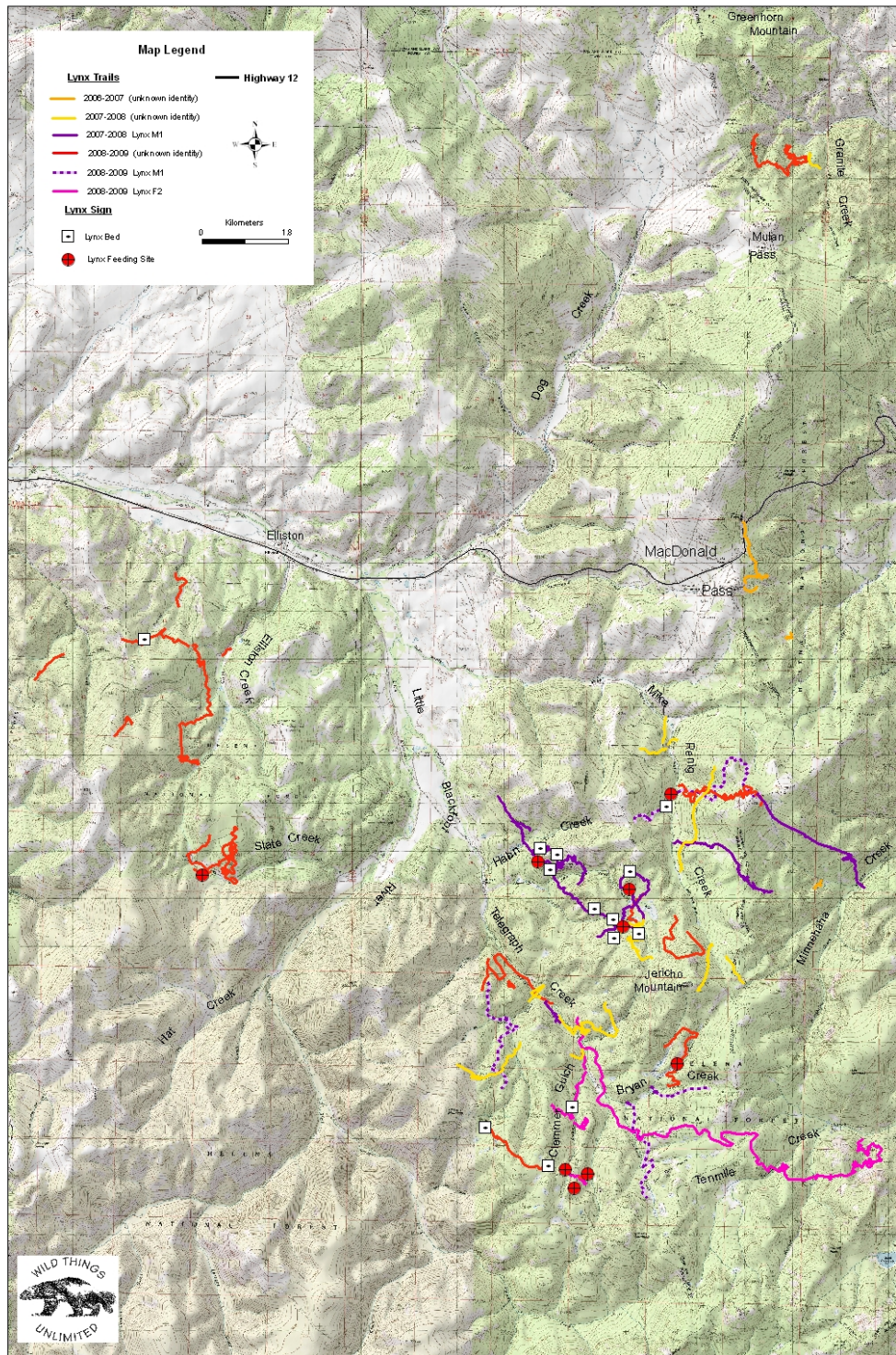


Figure 2. Locations of lynx trails, beds, and feeding sites documented during three winters (2006-2007, 2007-2008 and 2008-2009) in the MacDonald Pass Area of the Helena National Forest.

ATTACHMENT D

PARTIAL LIST OF CUMULATIVE EFFECTS TO WILDLIFE MOVEMENT ALONG CONTINENTAL DIVIDE (MFWP July 2006)

Project Nameⁱ	Location	Description	Rd Length	MFWP Comment
Prickly Pear Sportsman's Target Range	East side MacPass ⁱ T10N, R5E, Sec 29	20 Yr Special Use Permit 9 acres fenced; 3 ranges	?-needs evaluation	Used year-round. Occurs with 1.0 mile of MacPass Proposal
Recreation Residences	Forest Heights T10N, R5W, Sec 36	6 residences – 20 yr Special Use Permit	?-needs evaluation	
Recreation Residences	Moose Cr Villa T9N R5W Sec 16	5 residences – 20 yr Sp. Use Permit	?-needs evaluation	On Tenmile Cr Road, proposed Forest Recreation Highway. Within 3 miles of project.
Recreation Residences	Private lands	Special Use for access roads?	?-needs eval.	Evaluate within 3 miles of project
Micro-Wave Electronic Sites: North	MacPass North T20N R6W Sec 25	40 acres – 7 communication facilities & about 15 Special Use permittees. Graveled access road.	2.7 mi	Well maintained access road. Its partial exclusion from grooming will not negate its heavy winter use by recreationists & permittees.
Micro-Wave Electronic Sites: South	MacPass South T9N R6W Sec 2	Airport beacon – Special Use Permit	?-needs evaluation	
US Highway 12 road improvement	Segment US Highway 12 at MacPass	? acres – removal of vegetation; guard rails; sanding	?- add'l road length?	How will guard rails affect wildlife trying to cross highway? Describe salting effects on wildlife.
Cont. Divide Trailhead	Quigley Group Use Site T9N R6W Sec 2	Construction of new trailhead.	0.5 mi new rd; 0.5 mi new trail	Was additional projected human use evaluated on wildlife movement corridor?
Routine Use and Maintenance of Forest Roads	Vista Point, Cromwell Dixon, Forest Heights, Quigley Group Use, Micro-Wave, and a number of other Forest Rds in Ten Mile Drainage		?-needs evaluation	Miles of road within Continental Divide wildlife movement corridor (1 mi. on either side of CD) should be displayed and evaluated. Should address roads in Little Blackfoot Drainage* as well.
Routine Use and Maintenance of Forest Trails in Area	Cross-country ski trails (MacPass and Stemple Pass), Snowmobile trails in Ten Mile Drainage, Continental Divide Trail		Length of trails should be displayed in Table 2-1	Should address trails in Little Blackfoot Drainage* as well.

ⁱ MacPass is a euphemism for MacDonald Pass.

	(near MacPass) There are 2 trails within Ten Mile that are used primarily during summer and fall			
Battershell Properties Right-of-way	Former Frontier Town T9N R6W Sec 2	HNF seeking to acquire legal right-of-way across private land for cross-country ski trail. May involve reciprocal agreement that would also provide legal access to property owned by Battershell, currently authorized by special use permit.	?-needs evaluation (provide map)	Appears that legal access does exist through Special Use Permit
Allotment Management Plan (MacPass and Ten Mile/Priest Pass)	MacPass, Sweeney/Priest, Ten Mile/Divide	3 identified pastures in Ten Mile/Priest Pass Allots. MacPass grazed June-mid Oct. Proposal within this allotment.	(provide map)	Is project area to be fenced to keep cattle out? If so, describe fencing and consequences to wildlife. Where is salt used throughout allotments? (wildlife attractant)
Noxious Weed Treatments	Throughout HNF	Spray by ATV or by hand; biological; possible goats/sheep.		Use of goats/sheep often attract carnivores resulting in conflicts with wildlife; bears, lions, wolverine, bobcat, lynx present.
Developed Recreation Sites	Quigley Group Use, Trailhead, Cromwell Dixon Campground, Ten Mile Picnic Area, Moose Creek Cabin, Moose Cr Group Use Site, Moose Cr Campground	Open seasonally May-Oct. Cromwell Dixon provides 15 camping units. Cross-country skiing occurs within Quigley Site. Moose Cr site is snowmobile trailhead		Total acreage should be noted. Length of roads and groomed trails should be noted. New connecting road to Quigley site – EA justification to accommodate increasing human use.
Continental Divide Trail relocation	Top MacPass (specific segments and location not noted)	At some future date, a new segment of CDNST may be constructed connecting MacPass and Priest Pass	Length? (provide map)	
Power & Phone Utilities	MacPass T10N R6W Sec 25, 36	Utility lines are authorized under Special Use Permit. Routine maintenance of buried and aerial line is required.	Length? (provide map)	Micro-wave road is primary access route through Sec 25 and 36. Substantial use of road can be expected during all seasons. The fact that short segments of this road will not be groomed in winter

				is irrelevant since it will be compacted by use.
Yellowstone Pipeline Buried Gas Line	MacPass T10N R6W Sec 1,2 T9N R5W Sec 6	10" buried pipeline is located on NF. Occasionally maintenance is required	Length? (provide map)	What does "maintenance" of buried pipeline entail?
Touch America Buried Fiber Optic Line	Co-located with Yellowstone pipeline			What does "maintenance" of buried optic line entail?
Vista Point	South side of U.S. Hwy 12 – top MacPass	Vista point is a popular observation site and also provides access to CD trail	Length? (provide map)	Cromwell Dixon Campground expansion
LARGE PENDING PROJECTS OR EXISTING DEVELOPMENTS THAT INVOLVE OR AFFECT THE HNF & ITS MANAGEMENT				
Highway 12	MacDonald Pass	Access provided by Highway 12 to public and private land projects		Wildlife collisions will increase with increased developments on public and private lands. Where highways cross the divide, mitigation projects for wildlife should be implemented.
Private Land Development	Continental Divide – at least 10 miles in either direction of proposal	A buffer of 1.5 miles on either side of the CD should be considered		Private land development cannot be controlled but should be evaluated for impacts to the CD
Blackfoot-North Divide Winter Travel Planning	Blackfoot-North Divide	Pending project for 2007 – not yet completed in 2010		
Timber Sales/Fuel Reduction	Dozens of projects along Continental Divide have occurred in past 20 yrs	Elliston Face, Mullan Pass, Telegraph, Bryan, Hahn, Sweeney Cr, Greenhorn, Minnehaha, etc,		Have promised road reclamation-closures been completed? Weeds and OHV issues.
Great Divide Ski Area	Little Prickly Pear Creek Within 2 mi. of CD 11 mi N of MacPass proposal			
Military Training Exercises	Greenhorn; Sweeney; Ten Mile and Dog Creek areas	Special User Permits have been requested regularly for past 15-20 yrs		HNF issues special use permits for training. HRD has denied some requests based on wildlife concerns (9/23/1991). MFWP is on record with wildlife concerns.
Illegal OHV Use Area	Sweeney Creek (Ten Mile Cr) T10N R5W Sec 21, 22, 27, 28	See Photos of illegal user-created damage. Within 2 mi of MacPass proposal.		Helena Ranger District has not responded to MFWP request for intervention at this site.
Rimini Forest Recreation Highway	Ten Mile Creek T10N R5W; T9N R5W	Straighten, widen, and possibly pave approximately 8 miles of road to within 0.5 mile of Rimini. A project proposed by	8 mi upgraded	Parallels Continental Divide for 8 miles. Two secondary movement corridors from the CD are accessed

		Helena National Forest and Federal Transportation Dept.		by wildlife by crossing Ten Mile Creek.
Forest Service Mine Waste Cleanup on FS lands	Ten Mile Creek, Little Blackfoot	Tailings from selected mines are being moved to the crest of the Continental Divide for at least a 10 year period. On-going disruption to wildlife on the Divide.		Hauling material to repositories has resulted in road expansion on the crest of the Continental Divide. Activity: spring, summer, fall.
Mine Waste Haul Roads	Ten Mile, Little Blackfoot	Haul roads have been expanded for waste hauling on the Continental Divide	9+ miles	Passenger car road has been expanded and now occurs on crest of the Continental Divide. Upgraded road up Minnehaha provides convenient access to private in-holdings.
EPA Mine Waste Cleanup on private lands	Ten Mile, Basin Cr	At least 150 mines occur in the Ten Mile drainage alone, 70 of which are being treated during a 10+ year period		
Marysville Highway Project	Little Prickly Pear Creek-Silver Creek T12N R5W; T12N R6W; T11N R5W; T11N R6W	Straighten, widen, pave approximately 9 miles of road to near Great Divide Ski area; parking lot development for snowmobile off-loading near crest of Continental Divide	9 mi upgraded to paved	Will attract more use and funnel more people to the Continental Divide to a groomed snowmobile system that comes to within 3.0 miles of the Little Porcupine Loop of the Nordic ski trails.
Travel Management	Both in the Ten Mile and Dog Creek drainages	New travel management has been repeatedly deferred for the Divide Landscape Unit	?	Miles of road within 1 mile either side of CD needs to be considered
Snowmobile Trails	Both in the Ten Mile and Little Blackfoot drainages	Designated snowmobile routes for Helena and Lincoln Snowmobile Clubs occur near or across CD		All snowmobile trails (groomed and not groomed) should be evaluated for cumulative effects.

Length of Road – Most activities have associated road use. All road (or groomed trail) use within the Lynx Analysis Unit should be evaluated in the EA.

Activities in the Ten Mile drainage as well as the Dog Creek/Little Blackfoot drainage should be evaluated. The proposal occurs within 0.5 mile of the Continental Divide; its impact to wildlife use/movement in the Little Blackfoot drainage cannot be disregarded.