



May 25, 2016

HLC National Forest Supervisor Bill Avey  
Lincoln District Ranger Michael Stansberry  
Helena District Ranger Heather DeGeest

Dear Supervisor Avey and Rangers Stansberry and DeGeest:

We are writing to you on behalf of the Helena Hunters and Anglers Association to convey our group's support for Wilderness designation of the entire 58,000-acre Nevada Mountain Roadless Conservation Area. Our members have a nearly 40 year history of conservation support for this area. Our past involvement has included: 1) input on timber sale proposals on both the Lincoln and Helena Ranger Districts within this area, 2) active participation in development of the 1986 Forest Plan, including the R-1 designation for the 12,000 acre Nevada Mountain core area, 3) involvement in closure and signing of former open roads and trails within the roadless area, including Trail #467, the Helmville-Gould Trail, 4) citizen lobbying, petition development, and testimony pertaining to prior Congressional Wilderness bills which included Nevada Mountain, 5) analysis of and input on recent travel plans for the Blackfoot and Divide travel planning areas and, 6) citizen volunteer monitoring of grizzly bear rub sites and winter tracking of large predators focusing on wolverine and lynx.

As we have noted in previous comments, Nevada Mountain is the largest and highest roadless area on the HLC National Forest south of Highway 200. It provides critically important security habitat for sensitive species such as grizzly, lynx and wolverine, and increasingly rare hiding cover for elk during hunting season. The Nevada Mountain area, and particularly the area surrounding the Helmville-Gould Trail #467, has been portrayed as a "wolverine hotspot" by wildlife researcher Steve Gehman of Wild Things Unlimited. Montana Fish, Wildlife and Parks staff members have repeatedly conveyed the importance of the Nevada Mountain roadless area for grizzly bear, lynx and wolverine, and for elk security in comments on the Blackfoot Travel Plan and in testimony at the travel plan objection hearings. The 15 miles of the Continental Divide that runs through the heart of the Nevada Mountain roadless area are widely recognized as an important corridor for wildlife movement within the Northern Rockies Ecosystem. Headwater drainages within the Nevada Mountain Inventoried Roadless Area sustain clean, cold water essential to documented populations of bull trout in Poorman and Nevada Creeks, and to multiple downstream beneficial water uses in the Blackfoot and Missouri Rivers and their tributaries.

Helena Hunters and Anglers feel strongly that the Nevada Mountain roadless area should not be divided along the Helmville-Gould Trail #467 for future management prescriptions. The entire inventoried roadless area including wild lands from the Nevada-Poorman Creeks hydrologic divide and extending to the South Fork of Poorman Creek, and lands to the south of the trail extending to the headwater tributaries of Little Prickly Pear Creek, are of vital importance for big game security and should all be recommended for Wilderness designation. Our group endorses inclusion of the entire area as Wilderness and protests any management recommendation that would reduce the total acreage to

accommodate motorized or mechanized uses. We have previously detailed the long history of the management fiasco entailing the Helmville-Gould Trail #467 following its non-motorized designation in the 1986 Helena Forest Plan. The HLC National Forest should acknowledge and honor the 1986 non-motorized decision for this trail that many of us worked so hard for back in the early 1980s. Again, a Nevada Mountain Wilderness recommendation should include the candidate lands to the north as well as south of this trail.

We are aware of the Montana High Divide Trails Partnership's letter dated April 29, 2016 addressed to Rangers Stansberry and DeGeest conveying a recommendation for Wilderness designation of only an approximately 44,000 acre portion of the Nevada Mountain Inventoried IRA south of Trail #467. That group recommended primitive, non-motorized management of an additional 14,000 acres of the inventoried roadless area to the north of the Gould-Helmville Trail to accommodate future mountain bike use of the trail. Helena Hunters and Anglers Association members have been at the table at many of that group's meetings pertaining to the Helena-Lewis and Clark National Forest's forest planning process and Wilderness inventory. We have generally concurred with the group's prior recommendations, but take exception to the proposed mountain bike use because it would prevent the opportunity for designation of a larger Wilderness area. We are also intimately aware that mountain bike use on that trail would be a new use that is not present now, and that the trail would require substantial improvements to accommodate mountain bike use. A management recommendation to split the Nevada Mountain area along this trail, with a Wilderness recommendation for the southern portion, and a non-motorized, wildlife emphasis management prescription for lands to the north of the trail, cannot be justified on the basis of current or anticipated future mountain bike use. It would also invite a groundswell of opposition from the current motorized user groups who might otherwise support Wilderness designation and permanent closure of the Helmville-Gould Trail for the greater good of enhanced wildlife security and ecological integrity of the entire Nevada Mountain area. Again, we emphasize that mountain bike use does not now occur on the Helmville-Gould Trail #467. Excluding 14,000 plus acres of highly qualified potential Wilderness to accommodate this non-use makes no sense at all. Mountain bike use is neither established nor appropriate in this wild landscape and, if promoted in the future and with required trail improvements, it could lead to fragmentation from illegal user-created tracks. It makes no sense to not recommend all 58,000 acres for inclusion as Wilderness.

Based on the Lincoln Ranger District's landscape analysis during development of the Blackfoot Non-Winter Travel Plan, the Lincoln Ranger District needs all the intact, protected roadless/Wilderness designated lands it can muster south of Highway 200. A recommendation by the HLC National Forest for Wilderness designation of the entire 58,000 acre Nevada Mountain IRA is the best and most justifiable opportunity to enhance and permanently protect ecological integrity and wildlife and watershed values south of Highway 200.

Thank you for the opportunity to provide these comments. We are also appending comments previously submitted to the HLC Forest on the Nevada Mountain area during the Forest's Wilderness Inventory component of the new forest planning process.

Sincerely,

Gary Ingman, Vice-President

Bill Orsello, Board Member

March 11, 2016

Liz Van Genderen  
Helena-Lewis & Clark National Forest  
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**RE: Comments on Wilderness Inventory Component of HLCNF Forest Planning Process**

Dear Ms. Van Genderen:

I am writing to convey my personal thoughts on the HLCNF's Wilderness Inventory component of the Forest Planning process. By way of introduction, I am a third generation Helena native, a watershed specialist/hydrologist/biologist by profession, and I have been interested and involved in local forest planning and conservation issues for 40 years. I was actively involved as a citizen advocate in development of the 1986 HNF Forest Plan. I am currently the vice-president of Helena Hunters and Anglers Association. I serve as a volunteer in grizzly bear monitoring on the Helena National Forest and, since 2015, winter monitoring of predators on the Forest.

First, I would like to comment on Upper Blackfoot Inventory Area #10 (UB10), the Nevada Mountain Inventoried Roadless Area (NMRA). This area should be at the top of the list of inventoried areas that are recommended for Wilderness designation. I and my family have used this primitive area for non-motorized recreation and hunting for several generations extending back to the early 1900s. I am intimately familiar with this area and it has a special spiritual importance to me and our family. Through my citizen involvement in the development of the 1986 Forest Plan, we were able to secure designation of a 12,000 acre non-motorized core area within the central part of NMRA in the 1986 Helena Forest Plan. Most of the remainder of the roadless area was to be managed for wildlife emphasis. The integrity of the 57,000 acre area (reduced to 51,027 acres in your inventory unit, and down from 70,000+ acres in the RARE II evaluation) is actually higher today than it was in the early 1980s. Several illegal roads were constructed into the upper Nevada Creek drainage for placer exploration in the 1970s. This was rectified by mother-nature when flooding took out the drainage bottom roads. Several other roads and a fire break road extending to the Continental Divide were closed through travel planning. Subsequent non-motorized travel management of almost the entire area has improved wildlife security, watershed health and solitude for human visitors within Nevada Mountain. The upper portions of the Nevada Creek drainage, and Gleason Creek, were proposed by the HNF for logging in 1981. A groundswell of public opposition quickly caused these proposals to be withdrawn and this input helped develop the protections found in the 1986 Forest Plan.

Recent USFS sponsored studies on wolverine and lynx in this area have clearly demonstrated that portions of the NMRA are "hotspots" for these rare predators, and this speaks to the integrity and uniqueness of the wildlife habitat contained within UB10. The recent grizzly bear studies have regularly and repeatedly documented their presence within the NMRA. I have maintained a 15 station network of passive hair snares along the Continental Divide and down into Nevada Creek for USGS and Montana FWP for the past five years. Samples from these stations have yielded confirmed presence of grizzly bears in upper Nevada Creek. It is also increasingly acknowledged that this area, particularly the 15 miles of the Continental Divide that runs through it, is an incredibly important wildlife corridor which connects increasingly fragmented and shrinking adjacent habitat within the Northern Rockies Ecosystem and allows the transfer of genetic material between isolated populations. Bull trout were documented in upper Nevada Creek a number of years ago by HNF biologists, and in Poorman Creek and other Blackfoot River tributaries by Montana FWP biologists. Bull trout are an increasingly rare,

federally listed and highly sensitive aquatic species that are barometers for cold water and minimally sediment-impacted habitats. Their presence within the NMRA again speaks to the remaining high integrity of this area.

Elk and other hunted big game animals rely on the NMRA for security during the fall hunting season, and the presence of this expansive roadless area, and other roadless areas on the HLCNF, help support Montana's continuing ability to sustain a 5-week general rifle season. Public acquisition of the Grady Ranch conservation easements a number of years ago provides a guarantee of permanent winter range availability for NMRA's large elk herd. With the HLCNF's recent programmatic amendments to the Forest Plan big game security standards for both the Blackfoot and Divide Travel Planning areas, permanent protection of areas like the NMRA will be increasingly important to provide large blocks of high quality security in the absence of a required forest cover component elsewhere on the Forest.

From a human recreational perspective, the segment of the Continental Divide National Scenic Trail through the NMRA is among the most scenic in many miles of the trail when compared to segments to the south or north. Hiking the CDNST is increasingly popular and I have encountered many people, young and old, from many states and all walks of life on the trail within the NMRA during their traverses. I spend many days (more than 30) each year in all seasons within this area and on the CDNST and the predominant recreational use is hiking and sight-seeing, hunting on foot, horseback riding, and other non-motorized, non-wheeled travel. People come from Helena, Missoula, eastern and central Montana and, increasingly, from out of state to hunt in the NMRA and to hike the CDNST within NMRA. I have never encountered a mountain bike user within the NMRA, on or off the CDNST, in 50 years and hundreds of days of personal use in this area. Non-existent mountain bike use within the NMRA or on the CDNST should not be considered as a reason to exclude the area for a Wilderness recommendation. Use of the area for backcountry hunting has continued to increase every year and the quality of the wildlife and the backcountry experience is very high.

The high elevation Continental Divide country, Nevada Mountain and Black Mountain, and the prominent Gould-Helmville Ridge (Nevada Creek-Poorman Creek Divide) are critically important snowpack areas that sustain water supplies for downstream irrigators and instream flows that support major blue ribbon fisheries in the upper Missouri and Blackfoot Rivers and their tributaries. This needs to be an increasingly important consideration in land management planning decisions as we come to terms with global climate change and altered runoff hydrographs. Winter snowpack in the NMRA supports irrigation in the Avon-Helmville Valley (Threemile Creek, Nevada Creek, Little Prickly Pear Valley (South and North Forks of Little Prickly Pear Creek, Lost Horse Creek), and the Upper Blackfoot Valley (Poorman Creek and others). Little Prickly Pear Creek is a critically important trout spawning stream that supports record numbers of fish in the Missouri River near Wolf Creek and Craig and which has a huge economic impact to Montana. Wilderness designation would provide permanent protection for these water supplies that could otherwise be compromised by alternative land management scenarios.

Nevada Mountain also has cultural values that may not be well known. Paleo-Indian (8,000-9,000 ybp) use of this area is documented and projectile points have been recovered within the NMRA demonstrating the presence of aboriginal hunting and the long-term importance of the area as wildlife habitat and for human hunting.

Given all of the above attributes, I strongly urge you to recommend including the entire Nevada Mountain Roadless Area in your recommendation of areas suitable for inclusion in the Wilderness system. I also encourage you to consider removing adjacent timber suitability inventory areas that are reducing the area from the potential 56,000 acres to the inventoried 51,027 acres. Nevada Mountain was included in Pat Williams' 1988 Montana Wilderness Bill which passed both houses of Congress but

was pocket vetoed by President Reagan. I worked on that bill with Pat and other members of the Montana delegation, testified before Congress, saw firsthand the broad support that the bill, and this area, had from industry and conservationists. As I have stated, the integrity of this area is greater now than 30 years ago and its importance to man and nature for the above described multiple uses continues to grow each year. Wilderness would be an appropriate management designation for this incredible and highly unique landscape.

In addition to my experience with the NMRA/UB10, I am familiar with many of the other Wilderness inventory areas on the HLCNF. I have attended a number of the recent meetings convened by the Montana High Divide Trails Partnership. I have taken part in the group discussions and collaborations. I would like to go on record as supporting the recommendations of that group pertaining to Wilderness designation of several of the inventoried areas. Particularly, I would like to encourage you to recommend the following areas for new Wilderness: 1) the Scapegoat Wilderness additions (50,000 acres) in the Upper Blackfoot inventory, 2) Black Mountain south of Helena (11,000 acres), 3) Electric Peak (20,000 acres), 4) Camas Creek and Mount Edith and Baldy in the Big Belts (48,000 acres total); the Elkhorns Mountains (75,000 acres). Most of these areas were previously included in Pat Williams' 1988 Wilderness Bill that passed both Houses of Congress. Like NMRA, these areas have increased in value since 1988, for non-motorized human recreational uses, wildlife security and migratory corridors, aesthetics, provision of water supplies, and other values. Public demand for these dispersed non-motorized recreational opportunities continues to increase at a steady pace. I encourage you to be forward thinking and recommend these areas for permanent protection at this opportune time.

Lastly, I would urge you to look for opportunities to designate special management areas for high elevation lands that can connect the above inventoried roadless areas and facilitate wildlife movement/migrations, help overcome habitat fragmentation, and enhance wildlife security in the face of the new, less protective big game security standards.

Thank you for the opportunity to offer my perspective, and good luck with this huge undertaking! When in doubt, let good science prevail in your decision making.

Sincerely,

Gary Ingman

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