

January 15, 2009

Divide Travel Plan Leader  
Helena Ranger District  
2001 Poplar  
Helena, MT 59601

RE: Comments on Continental Divide Travel Plan Proposed Action

Dear Travel Plan Leader:

Thank you for the opportunity to attend the December 1, 2008 open house meeting on the Divide Travel Plan and to relay the following comments in response to the proposed actions. By way of background, I am a third generation Helena native and have been actively involved with forest planning issues on the Helena National Forest for nearly 30 years. I was a co-founder of the Nevada Mountain Concerned Sportsmen in 1981 and the Helena Forest Conservation Coalition in 1982. Both citizen groups were actively involved in the formulation of the current Helena National Forest Plan and in the development of forest management prescriptions and a travel plan for the Helena National Forest portion of the Continental Divide.

It is my strong opinion that forest management direction established for the Divide area over the last 20 years is providing major returns today in the form of a growing elk herd, increasing wildlife diversity, improved watershed health, and enhanced opportunities for dispersed non-motorized recreation. Actions that were implemented under the 1986 Forest Plan included designation of R-1 non-motorized core areas along the Divide, additional area travel closures and travel restrictions on a growing number of forest roads, reductions in timber harvest and associated road building, and better enforcement of certain unpermitted activities on the forest.

I offer the following comments on the proposed travel plan revisions which are based on my knowledge of the areas and their resource values.

#### General Comments on Proposed Actions

- 1) Authorization of illegally created travel routes is poor public policy and rewards lawbreakers.
- 2) Decisions to re-open roads that were previously closed to address fish and wildlife habitat or water quality problems will need strong site-specific justification that the problems have been resolved and proof that the improved conditions can be maintained under motorized use scenarios.
- 3) Opening roads to increase hunter opportunity is poor logic. Abundant literature demonstrates that hunter opportunity is best increased by reducing open road densities on the forest.
- 4) Creation of new motorized routes in proposed Wilderness areas compromises the Wilderness option and should not be considered.
- 5) The Continental Divide should be managed for non-motorized uses because of its importance as a wildlife migration corridor and to ensure consistency with national non-motorized policy direction for the Continental Divide Trail.

- 6) New snowmobile use should not be authorized on existing ski trails thereby inviting user conflicts.
- 7) Snowmobile use should not be authorized in areas adjacent to closed trails. Non-motorized buffer areas should be established adjacent to those trails.
- 8) New motorized travel routes should not be authorized within documented seasonal habitats for sensitive species, especially lynx and wolverine.
- 9) In general, a forest-wide goal should be adopted to reduce the density of open motorized travel routes rather than increasing them. Existing open road densities are too high and motorized use of the present road network contributes to the spread of noxious weeds, disturbs wildlife, degrades water quality, damages vegetation and soils, and contributes to global warming.
- 10) New motorized travel routes should not be authorized in watersheds with documented water quality impairments that are attributable to sedimentation or aquatic habitat degradation associated with forest roads.
- 11) Enforcement is the key to the success of any travel plan. A plan must be developed, funded and implemented to ensure area and seasonal use restrictions are monitored and effectively enforced. This is presently a huge problem on the Helena National Forest.

#### Site-specific Comments on Proposed Actions

##### **Nevada Mountain Roadless Area –**

Travel plan decisions for this area need to be compatible with decisions for the adjoining area on the Lincoln Ranger District and protective of future options for a Nevada Mountain Wilderness area. The proposal to move the motorized closure at its present location on Black Mountain south to Dana Springs is a good one. A buffer area should also be established along the west side of the Divide Trail where winter snowmobile use is not permitted.

##### **Electric Peak Roadless Area –**

The 15,000-acre Electric Peak roadless area has been previously recommended for Wilderness designation and this opportunity should not be compromised by increasing motorized travel routes in the vicinity. The core roadless area is flanked by other important roadless tracts on the north and east including Kading Ridge and along the Continental Divide east of Bison Mountain. The Electric Peak area was closed to motorized traffic year around in 1997 to protect the wilderness characteristics. I support the proposed expansion of the non-motorized designated area to the east, but opening Bison Mountain to snowmobiling is inconsistent with the 1997 area closure and compromises the Wilderness option. The adjacent roadless headwater areas of Bison and Ontario creeks, including about seven miles of the Continental Divide National Scenic Trail, is a critically important wildlife security area and habitat for sensitive species. The proposed action incorrectly allocates this sensitive wild area to motorized uses and reverses permanent year round road closures to accommodate expanded snowmobile use and ATV traffic. I urge you to leave roads closed and to fully protect the Continental Divide Trail and its roadless corridor in a year around non-motorized prescription.

I support the proposal to manage the trail above the Kading Cabin as non-motorized and encourage you to close other user-created ATV trails in this area to protect wildlife security attributes. User-created trails should be rehabilitated immediately and closures enforced.

The Hat Creek road should not be opened to motorized access in order to protect existing wildlife security values.

**Jericho Mountain Roadless Area –**

The Jericho Mountain roadless area along the Continental Divide from Jericho Mountain to MacDonald Pass is an important non-motorized recreational area, includes seven miles of the Continental Divide Trail, is a critically important wildlife migration corridor, and is the municipal watershed for the City of Helena. The proposed action fails to include the Continental Divide Trail corridor itself within a non-motorized prescription and should be reconsidered. It also would authorize a winter motorized travel route across the Continental Divide Trail and Bear Gulch, which are currently locally important non-motorized winter recreational use areas. I urge you to manage all roadless forest lands along the Divide from Jericho Mountain north to MacDonald Pass and east to Tenmile Creek to be classified and managed as non-motorized use areas.

**Sweeney Creek Primitive Area –**

The Sweeney Creek is an important and well documented winter range area for elk, deer and moose. Due to poor enforcement, illegal off-road vehicle use has been allowed to increase in this area over the last decade despite repeated public requests to reverse the trend. The proposed changes to the travel plan fail to reverse the resource damage that has occurred in this area (including erosion, weed infestations, and compromised wildlife values). Instead it would legitimize the abuse by opening formerly closed roads and authorizing motorized use of the user-created routes. Please consider closing lower Sweeney Creek to off-highway vehicle traffic year-round and allow the area to heal. Additionally, the 5,000-acre Sweeney Creek Primitive Area should be classified and managed as a year around non-motorized area to protect dispersed non-motorized recreational uses and to restore the wildlife values.

This concludes my comments for the present time. In addition, I would like to go on record as endorsing the separate comments submitted by Stan Frasier on behalf of the Helena Hunters and Anglers Association, of which I am a board member.

Thanks you again for the opportunity to comment, and please retain me on the mailing list for future comment opportunities and decision notices.

Sincerely,

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