



Ms. Amber Kamps, Ranger
Lincoln Ranger District
1569 Highway 200
Lincoln, MT 59639

September 30, 2009

Re: Blackfoot Travel Plan

Dear Ranger Kamps,

Please accept the following comments from the Helena Hunters and Anglers Association for the Blackfoot Travel Plan scoping effort. 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 recreation opportunity for all citizens to share equally.

Accessing the boundary of public lands is important, and reasonable distribution of motorized routes to public lands should be available and reasonably distributed across the landscape so as not to compromise the ability of habitat to provide security to hunted species. We wish to be clear that our interpretation of "access" to public lands involves fair chase principles of hunting wherein motorized transport is not used by the hunter to gain advantage over the quarry. There may be special circumstances such as where handicapped hunters might be provided some level of motorized privilege to designated areas.

We also support equal footing for all hunting seasons (bow season, general rifle season) with regard to motorized access and therefore recommend that hunting season motorized restrictions apply to the bow season as well as the general rifle season.

To meet obligations of Forest Plan standards for wildlife and wildlife habitats as well as Executive Order 11644 to, "ensure that the use of off-road vehicles

on public land will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those public lands,” we request the following:

- Eliminate user created motorized routes (yellow trails on your scoping map) and where use has created rutted, eroded, or damaged vegetation or soils, restore the ground to sustainable healthy condition.
- If all routes are not identified on your scoping map, consider them unavailable for future consideration of use. On the other hand, if routes that appear on the map, do not in fact occur on the ground, neither should those routes be considered for any type of use.
- Implement a “Closed unless Posted Open” motorized use policy.
- Aggressively and perpetually address the presence and potential spread of noxious weeds.
- A clearly stated standard of 50 inches or less for motorized trail use – ever larger ATVs should not be accommodated on public lands.

We are particularly concerned about impediments to wildlife linkage corridors as they affect site specific habitat, flow of wildlife genetics as well as movement of individual animals across the landscape. Wildlife connectivity is clearly an issue of concern. So much so that Lewis and Clark County passed Resolution 2008-57 RESOLUTION TO PROTECT AND PROMOTE THE CONSERVATION OF WILDLIFE HABITAT AND CORRIDORS ON THE CONTINENTAL DIVIDE. And, the Western Governors Association has focused on: “identification of key wildlife corridors and crucial wildlife habitats in the West in order to conserve these lands—and the vast wildlife species that depend upon them—for future generations” (<http://www.westgov.org/>). The density of both “open” roads and user created routes in T15N, R05-06W, is alarming in the context of wildlife connectivity in the vicinity of the Continental Divide. Similar concerns exist in T13N R07W and T14N R07W, as well as in the Ogden-Dalton area. We are particularly concerned about the Gould-Helmville trail and route 487 that bisects the Nevada Mountain Inventoried Roadless Area (IRA) from east to west and from north to south. The importance of Roadless Areas as larger blocks of non-motorized country cannot be overstated for wildlife species that particularly benefit from low human contact. In and immediately adjacent to the Nevada Mountain Roadless Area, our members have personally observed grizzly bear, wolverine, wolves, and mountain lions. We request removal of motorized routes from Inventoried Roadless Areas, and in other wildlife linkage areas, a low road density (approximately 1 mile per square mile or less).

We wish to see an analysis of the following and how implementation of any selected travel plan would comply:

- Big game standard #3 (elk summer range hiding cover and winter range thermal cover) and #4 (implementation of an aggressive road management program to maintain or improve big game security).
- Forest plan soil standards.

- Cumulative effects and how implementation of the selected travel plan would ameliorate or exacerbate such.
- Grizzly bear standards and how grizzly use south of Highway 200 would be accommodated
- Lynx guidelines and implications of the travel plan for lynx analysis units.
- Sensitive species
- Climate change implications to landscape function for wildlife (such as pika and wolverine, etc.)
- How this plan contributes to a reduction of greenhouse gasses and thus locally addresses climate change concerns

Helena Hunters and Anglers Association appreciates implementation of “Closed Unless Posted Open” designations on other areas of the forest and would like to see it applied to the Blackfoot Travel Plan. In addition, we would like to see a decision that clearly commits to enforcement of provisions of any adopted plan.

HHAA is committed to promoting ethical hunting environments and healthy functional landscapes for wildlife, so we are keenly interested in development of the Blackfoot Travel Plan and appreciate this opportunity to be involved

Respectfully,



Stan Frasier, President
Helena Hunters & Anglers Association
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