

December 27, 2010

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Lincoln Ranger District  
1569 Highway 200  
Lincoln, MT 59639

Reference: Blackfoot Travel Plan  
Proposed Action Scoping Document  
Helena National Forest, Lincoln Ranger District

Thank you for the opportunity to comment on the above project:

North of MT 200

1. Please include my September 29, 2009 Pre-NEPA scoping letter and map on file at the Lincoln Ranger District as part of these comments.
2. The First Gulch Road will provide the public access to the public land as per the easement. The 1000' of construction is needed on the private land plus I recommend developing a parking/turn around/trailhead site on FS land about 2000' past the private land on an existing road. There is a good safe site that would need minimal improvements.
3. Having a portion of the maze of logging roads between Cadotte creek and Alice creek as proposed, open to ATVs < 50" wide for July and August is reasonable to me. Noxious weeds are on these roads plus some spot erosion issues. Some roads are needed for power line management and operations. This area provides a large block of big game security. The elk in this area winter in HD 422 east on the continental divide where private land game damage has a history. Manage this area on National Forest to keep public wildlife on public land. If you are sure the seasonal ATV trail on these logging roads will not displace wildlife, spread weed and cause erosion then they are reasonable to me.
4. The ATV trail between Stonewall Lookout and Cotter mine should be closed yearlong. It is shallow wind blown soil, there is a Mountain Goat population that should not be displaced or have motorized displacement.
5. The Stonewall creek trail should be closed to motorized use due to erosion from vehicles tracks, water damage and noxious weed spreading up the trail. Also it is very wet lush bear habitat.
6. Trails 417 and 418 should have the same season of use as the N. Fk. Keep Kool roads. This will reduce erosion and help wildlife security. Roads and trails open July and August only.
7. The two proposed road construction segments in Lincoln Gulch connecting roads 1824-D1 to 626-B1 and 626-A1 to 4023 would make the public land less secure for wildlife, spread noxious weeds, enhance cattle trespass, increase habitat loss to wildlife and promote land use change at the cost of wildlife. The public land is not obligated to enhance subdivision motorized recreation at the cost of land production or wildlife value.

8. Road U-092 west of Long Point has no public ROW however it provides powerline management access and NWE has maintenance use needs for this road. This road is less than ¼ mile from MT 200, opening this road as proposed will reduce wildlife security plus and increase poaching. This road should be non-motorized year long for wildlife habitat and security.

9. All the roads on the recently acquired TNC land on the west side of Black mountain are covered with noxious weeds, serve as a route for trespass cattle grazing and should be put into storage. Putting these roads into storage would enhance the big game security and winter range.

10. Dry creek road 4106-J2 has been closed for over 25 years, full of trees and shrubs. I recommend storage for this and 4106-J1 for wildlife security and to reduce the potential for grizzly bear accidental killing by road hunters. These roads have lots of bear forage growing on them also.

#### South of MT 200

1. I bring your attention to the Montana Final Elk Management Plan, January 2005, Granite Butte EMU, pages 195-202.

“Past off-road motorized travel has resulted in pioneering of travel routes and thus reduced habitat security and habitat effectiveness.” (pg. 195-196)

“At the same time, motorized use of public lands has diminished wildlife security and habitat integrity.” (pg. 199-200)

2. Road 1163-E1, Road 1823 and 1808 should be kept non-motorized to keep wildlife on public land to avoid private land intolerance of wildlife damage. Private land served by Road 1823 can have land owner use.

3. Road 1163-F1 and 1823-B1 are mostly on private land.

4. Road 1823-J1 could be put into storage.

5. Road 8963 has private access only from private land. This road should be obliterated for the first mile on the forest.

6. Road 1891, Sec 30, T13N ROW that is proposed for no seasonal motorized restrictions is restricted on each end. It makes no sense to have this one unrestricted. I think it's reasonable that this road can be a seasonal (July and August) motorized route connecting Clear Creek Road to Dalton Mountain Road.

7. Road U-1891 was a minerals exploration route pre WWII. I think it is reasonable that this route could be a seasonal (July and August) motorized system trail.

8. In Madison Gulch the proposed storage of approximately one third of a mile connecting Road 4195-A1 to Road 1829-C1, I recommend obliteration for wildlife security and reduce stream bank damage from vehicles crossing Madison Gulch. Lower Sauerkraut Roads 1892-D3 and D1 closing as proposed will enhance wildlife security and reduce erosion and be compatible with Sunny Slope Grazing Association block management area.

9. Shingle Mill Creek/Mitchell Creek Road 4047 has no public right-of-way from the Nevada Creek Road to the forest boundary in Shingle Mill Creek. Exclusive private motorized access to

the forest during hunting season exists here. Public right-of-way is needed. Private land owners south of Mitchell Creek along the forest boundary have recently left the block management program so public access has been further reduced.

10. Road 1879, Prickly Gulch has maintenance needs, in particular, cross drains. This road provides access to numerous mining claims and the Prickly Gulch Trail. It is unreasonable to me to have this road open only to vehicles less than 50 inches in width when maintenance can correct the erosion.

11. Route U-416 in Rochester Gulch is an exclusive illegally built user created route. I recommend obliterating this route to reduce noxious weed invasion and exclusive private access.

12. Hogum Creek, 7 Up Pete Creek, and Black Diamond Creek areas: 7 Up Pete Creek Road U-8125 has a private exclusive access and motorized river ford just north of the forest boundary in Section 14, T13NR6. In addition to the proposed obliteration of U-8125, erosion control and noxious weed control is critical. The three above drainages are year around elk habitat with lots of mesic habitat and winter range on public land. This is an area to keep wildlife on public land and avoid private land intolerance to wildlife damage. I am opposed to opening the Hogum Creek Road 1841 and its tributaries to motorized vehicles. This road has had limited permitted vehicle use since construction. It's stable and mostly weed-free. There are no public right-of-ways across the 7 Up Pete patented mining claims. The subdivisions in Hogum Creek historically have been the source of high illegal ATV activity on the National Forest. To me, opening Road 1841 will have a major negative wildlife impact and reward illegal ATV use with a legal route into the heart of this elk security area.

13. The proposed non-motorized trail U-1827 in Roosterville Creek is a good idea. This trail was historically an illegal ATV route from Roosterville Creek to provide access behind closed roads for exclusive big game hunting.

14. Upper Canyon Creek Road 1819 and U-051 were originally built for mineral exploration and have become exclusive private motorized routes from private land onto the National Forest. These two roads are eroding and have noxious weeds throughout. I recommend obliteration and re-vegetation of these roads.

15. The CDNST between Flescher Pass and Stemple Pass should be non-motorized. This trail has very erosive soils. There are miles of logging roads east of Stemple Pass and adjacent to the CDNST that are open for motorized enjoyment.

16. The CDNST from Marsh Creek Divide west for approximately one mile is an eroding unmaintained road. I recommend this one mile be converted to a trail which would include obliterating half of this road. Parking would be at the Marsh Creek Divide. This road is a pipeline for noxious weeds into the Nevada Creek roadless area.

17. The Gould Helmville Trail from its junction with the CDNST west to the Jefferson Creek Road, I recommend becoming non-motorized. Erosion, spreading noxious weeds, and wildlife displacement by the present motorized use are the main resource damages. This trail is in the Nevada Mountain Roadless Area (1606). Solitude is diminished by the current motorized use. Hunting is the most popular recreation in this area. Motorized versus non-motorized hunting conflict exists and is increasing along this trail.

18. Prickly Gulch Trail 487 north of the Helmville Gould Trail has severe motorcycle caused erosion and noxious weed spreading, trail widening. I hike this trail several times a year and obviously see accelerated resource damage from motor cycles in the form of churned up land and a spaghetti network of motorcycle trails. I recommend this trail be non-motorized. It is also in the Nevada Mountain Roadless Area.

In closing, I have spent 31 years on the ground in this area of the Lincoln Ranger District. I know it very well. Identifying and preventing resource damage, i.e. erosion and water degradation, and keeping wildlife on public land to avoid private land damage and intolerance by private land owners are my main issues and concerns for the Blackfoot Travel Plan. As an avid hunter and an advocate for wildlife, I've worked diligently to try and prevent game damage on private land by advocating public land management that prevents displacement from public to private. This is a big deal in wildlife management in the upper Blackfoot.

As per my recent conversation with the FWP TIPMONT Manager, there are 50,000-60,000 OHVs in Montana and growing. Enforcement is difficult, penalties are low, and not a deterrent. The hunters' perception is they are sick and tired of being passed by ATVs when walking. Opening more roads will make it hard to catch violators and increase abuse. Springtime illegal OHV antler hunting is a real problem on winter range.

The subdivisions in Hogum Creek, 7Up Pete Creek, Lincoln Gulch, Poorman Creek, Clear Creek, Roosterville Area have a long history of illegal motorized use, illegal trail construction, and social conflict with non-motorized users on the Lincoln Ranger District.

Sincerely,

Rod Bullis

cc: FWP, PLWA, MWF, MWA, HHA, HNF Forest Supervisor