



January 5, 2011

Mr. Kevin Riordan  
Forest Supervisor  
Helena National Forest  
2880 Skyway Drive  
Helena, Montana 59602

Amber Kamps  
District Ranger  
Lincoln Ranger District  
1560 Highway 200  
Lincoln, Montana 59639

Jackie Heinert  
Project Leader  
Lincoln Ranger District  
1560 Highway 200  
Lincoln, Montana 59639

SUBJECT: Blackfoot Travel Plan Scoping Comment Summary

Dear Supervisor Riordan, Ranger Kamps, and Project Leader Heinert:

The Helena Hunters and Anglers Association (HHAA) appreciates the time that you both took with us to discuss the proposed Blackfoot Travel Plan. We are heartened by your comments indicating that the final plan will address Area Management and careful placement of designated motorized routes to avoid circumvention of either road closures or the intent of travel planning. We are anxious to be active participants in development and implementation of a comprehensive plan that fully addresses the needs of water quality, soil integrity, native vegetation, fish and wildlife populations and their habitats, as well as fair chase hunting opportunities.

Helena Hunters and Anglers Association members live, work, and recreate on the Helena National Forest, and several of our members are intimately familiar with the Blackfoot Travel Planning Area. Our membership includes several professionally trained natural resource managers. We either are now or have previously worked in the fields of fish, wildlife, forestry, recreation management, water quality, and environmental assessment. Our mission statement is commensurate with stated management objectives for the Helena National Forest:

*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.*

The following members of our club formed the Blackfoot Travel Management Evaluation Committee, and includes: Rod Bullis, Gary Ingman, Gayle Joslin, Bill Orsello, Charlie McCarthy, Steve Platt, Jim Posewitz, and Ron Steg. We have reviewed the conceptual alternatives in the Blackfoot Travel Planning area and provide extensive detailed comment in the attached narrative. Our comment focuses on the following issues:

- **Wildlife, fisheries, soils, and water quality standards** must be met in accordance with the HNF Plan.
- **Subpart A of the Travel Management Rule** should be stringently applied to support watershed restoration and resource protection to sustain healthy ecosystems and ecological connectivity.
- **Area management for the Blackfoot.** We request that the Blackfoot landscape be managed on an area basis rather than through simple designation of individual routes. Such an approach will take into consideration the larger long-term positive context of travel management: natural resource maintenance and land rehabilitation. Non-motorized Areas are itemized and discussed.
- **NEPA process.** All routes considered in this planning process must have already gone through the **NEPA process**. User created routes and unclassified routes constructed for short-term use must not be included in this travel decision.
- **Water quality** compliance with Ninth Circuit Court of Appeals, Case No. 07-35266; NEDC v. Brown – the application of Clean Water Act to logging roads.
- **Criteria to evaluate road presence and placement.** Please describe how the proposal will correct for issues raised in the 2004 Roads Analysis Report.
- **Access and Hunting Opportunity.** Hunting opportunities should be managed to facilitate *fair chase*. Where access to national forest lands is limited, efforts should be made to accommodate it, but where excessive motorized access occurs on public lands, it must be reduced to improve habitat effectiveness and security and not contribute to wildlife displacement to private lands where depredations create social intolerance for wildlife.
- **Motorized routes** are just that – motorized. There should not be various classes of motorized users (motorcycles, ATVs, full-sized vehicles).
- **Ethical hunting environments.** Land and wildlife management agencies must address the issue of ethical hunting environments in their planning processes. Montana citizens, through the Hunter Behavior Advisory Council, have identified motorized and off-road vehicle use as the primary cause of unethical hunter behavior.
- **Continental Divide wildlife linkage corridor.** Lewis & Clark County Resolution 2008-57: Resolution to Protect and Promote the Conservation of Wildlife Habitat and Corridors on the Continental Divide. Continental Divide wildlife linkage corridor needs to be recognized and accommodated via non-motorized or very low density motorized use.
- **Non-motorized area expansions.** HHAA supports non-motorized area expansion as offered by the Montana High Divide Trail Group for the Continental Divide Conservation Area.
- **Grizzly bear road density standards** for open routes and total routes should be applied throughout the USFWS Grizzly Recovery Zone, and those densities should be applied to Helena National Forest lands outside the Recovery Zone south of Highway 200. The HNF south of Highway 200 is recognized by experts as critical linkage landscape for grizzlies as well as other species.
- **Lynx habitat** and the persistent presence of lynx south of Highway 200 have been documented. Managing HNF landscapes to insure lynx recovery through proactive habitat management and connectivity is required through USFS management direction.
- **Climate change and carbon footprint.**
- **Detailed discussion of individual routes**

We are anxious to work with the Helena National Forest and others who have expressed an interest in shaping an alternative that meets the needs of fair chase hunting opportunities, non-

motorized recreation, as well as the careful stewardship of fish, wildlife, vegetation, water, and soils.

In conclusion, we ask that our concerns and suggestions be given full and serious consideration in travel planning and impact analysis, and ultimately travel plan implementation on the Helena National Forest.

Sincerely,

A handwritten signature in black ink that reads "Stan Frasier". The signature is written in a cursive, flowing style.

Stan Frasier, President

Attachments

Cc: Montana Fish, Wildlife & Parks  
Region 2 Supervisor, Mack Long  
Region 3 Supervisor, Pat Flowers  
Region 4 Supervisor, Gary Bertelloti