



Montana Fish, Wildlife & Parks

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Ref:DO089-13
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Helena National Forest
Attn: Blackfoot Travel Plan
2880 Skyway Drive
Helena, MT 59602

Reference: Blackfoot Travel Plan--Draft Environmental Impact Statement (designating motorized and non-motorized routes for non-winter travel on the Lincoln Ranger District of the Helena National Forest)

Dear Helena National Forest:

Montana Fish, Wildlife and Parks (FWP) has been actively engaged in the development of a revision of the Helena National Forest (HNF) Blackfoot Non-Winter Travel Plan for over 5 years. Agency staff from a variety of disciplines have attended numerous meetings with the Forest Service and stakeholders. Staff has consistently offered substantive comments during scoping, and has thoroughly reviewed this current Draft Environmental Impact Statement (DEIS) for the proposed travel plan (hereafter, Plan). FWP strongly recommends adoption of Alternative 3 with the exceptions and refinements described in the following letter.

The US Fish & Wildlife Service (USFWS) National Survey estimated that 950,000 persons (resident and nonresident) participated in wildlife-associated recreation in Montana in 2006--this recreation included 291,000 anglers, 197,000 hunters, and 755,000 wildlife watchers (USDI and USDC 2006). Estimated expenditures were \$226 million for anglers, \$311 million for hunters, and \$376 million for wildlife watchers. Clearly, our wildlife is an important driver of Montana's economy--it's why many folks live in and visit Montana. FWP believes Alternative 3 (with limited exceptions) would be the best of the HNF's 2 action alternatives because--compared to Alternative 2--Alternative 3 would better and more sufficiently protect and improve habitat for important game species, terrestrial wildlife species of concern, and regionally significant populations of native trout. This alternative would also remove redundant and unnecessary roads while providing additional wheeled motorized access and recreational opportunities in places where, and at times when, motorized access is compatible with other important Forest resource values.

COMMENT ORGANIZATION

The Blackfoot Travel Plan (Lincoln Ranger District) covers portions of 3 FWP Regions. The majority of the Plan's area is in FWP Region 2 (west of the Continental Divide, headquartered in Missoula), with smaller portions east of the Divide in Regions 3 (Bozeman) and 4 (Great Falls). Our comments are

organized in the following order: **FWP REGION 2**, **FWP REGION 3**, and the **PARKS DIVISION**. (We note that "recreation" is a broad concept with many types of nonmotorized and motorized categories and an even broader range of types of activities that recreationists pursue in the HNF; therefore, recreational comments can be found within all of the 3 main categories of our letter.)

FWP REGION 2

In particular, FWP supports Alternative 3's formal designation of the Helmville-Gould and most of the Continental Divide trails (CDT) as non-motorized. FWP also supports the proposed 9/1 (September 1) seasonal closure of motorized routes in the Stonewall Lookout area. Motorized use of the Helmville-Gould Trail and CDT has been controversial for years--strong arguments can and have been made that they never should have been open to motorized use to begin with. Their designation as non-motorized trails would strategically increase secure habitat within an important grizzly bear Biological Activity Center and would help ensure functional connectivity between the Northern Continental Divide Ecosystem (NCDE) and expanding subpopulations of grizzly bears further south. Designating just these two trails as non-motorized would also dramatically increase elk habitat effectiveness and security in herd units where these values may be limiting. Enacting these important changes makes it possible for us to support the development of, and expected increase in, summer motorized recreation in other areas of the Plan Area where that activity is more appropriate.

In addition to the specific recommendations below, FWP is concerned that Road U-066 above Patterson Prairie is proposed to be opened to year-round motorized ("highway legal vehicles") access under Alternative 3, where it is proposed to remain closed under both the No-action Alternative and Alternative 2. This area is used extensively by grizzly bears (FWP researchers have captured at least two bears on the closed road in recent years), and opening Road 066 would reduce big-game security in an area where such secure habitat is limited. We found no rationale in the DEIS explaining why this particular road should be opened to motorized use. Therefore, unless there are compelling resource issues requiring the road be open, FWP recommends it remain closed.

Elk

Annual aerial surveys of elk in deer/elk hunting district (HD) 281 north of Highway 200 are used to evaluate elk population status in that HD as well as adjacent HDs 284 and 280. Although total elk numbers are currently *within* objective in HD 281 (not "*above*", as stated in the DEIS), bull survival (a 3-year average of 9 bulls:100 cows observed in spring) has consistently been well below the objective of 15 bulls:100 cows described in the Montana Final Elk Management Plan (MFWP 2004).

Annual aerial surveys are also conducted in HD 293 south of Highway 200. Elk numbers are significantly, and chronically, below FWP objective in this hunting district (contrary to assertions in the DEIS, e.g., p. 236). Declines have been most pronounced in the northern portion of the HD that includes this Plan area. The 5-year average bull:100 cow ratio (11:100 cows) is only slightly above the HD's minimum objective of 10:100 cows.

In managed landscapes, open motorized route density and arrangement during the fall hunting season most strongly affects bull survival. Inadequate secure public land habitat may also cause elk to increase use of nearby private lands that provide only little or no public hunting opportunity.

The HNF is proposing to change elk security Standard (4a) by which elk security is measured and provided for within the Blackfoot Travel Plan area. FWP is currently evaluating the proposed change and

will separately provide detailed input during that proposal's public comment period. In general, however, any analysis of elk vulnerability and habitat security must take into account all routes open to any public or administrative motorized use during any portion of the fall hunting season, defined as the period between 9/1 and 12/1 each year. Similarly, analyses of summer habitat effectiveness should consider the period between 5/16 and 8/31. Seasonal road closures should correspond to these dates and should be consistently adopted throughout the Plan area.

Implementation of Alternative 3 (with noted exceptions) would provide the greatest benefit to elk herd units that rely on public land within the Plan area. Habitat effectiveness outside of the hunting season would be greater than under Alternative 2 and, more importantly, elk security would be significantly increased due to permanent and seasonal motorized route closures during the fall hunting seasons. FWP expects that implementation of Alternative 3 would increase bull survival on the Travel Plan area and help affected herds achieve or maintain FWP bull-ratio objectives going forward.

Mountain Goat

FWP strongly supports the proposal under Alternative 3 to seasonally restrict motorized use of Route 417 leading to Stonewall Lookout and to obliterate Trail U330-B1 leading from the Lookout, in order to reduce disturbance to the resident goat herd, especially during the pre-winter period. We disagree that limiting off-highway vehicle (OHV) access to the Lookout during fall would also increase the risk of illegal goat harvest, but agree that restricting similar motorized access to the head of Copper Creek would decrease the risk of illegal harvest there (p. 249). We support the conversion of Trails 485 and 771-A3 to non-motorized trails.

Grizzly Bear¹

The portions of the Travel Plan area north of Highway 200 are within NCDE Grizzly Bear Recovery Zone and are part of the Monture-Landers Fork Bear Management Unit (BMU). Helena National Forest lands within this BMU are composed of the Arrastra Creek, Red Mountain, and Alice Creek subunits and are essential to grizzly bear recovery within the NCDE. The lands in this area should continue to be managed to maintain habitat components vital to the long-term survival of the species. Given this management directive, Alternative 3 is clearly the best approach to managing grizzlies in this portion of the HNF.

Travel Plan lands south of Highway 200 have been re-colonized by grizzly bears and the mountain-ridge systems and drainages along this portion of the Continental Divide offer both high quality habitat and habitat connectivity allowing dispersal to southern HNF lands. In the last 10 years FWP and other agencies have verified multiple grizzly bear occurrences and mortalities as far south as Butte, Anaconda and Deer Lodge. Grizzly bear activity is increasing each year on the Lincoln Ranger District south of Highway 200; Alternative 3 is clearly the most appropriate Travel Plan alternative to benefit grizzlies occupying these lands outside of the designated Recovery Zone.

Specifics

The DEIS is in error when it states there are no grizzly bear Biological Activity Centers (BACs) south of Highway 200. It was noted in Chapter 3 (p. 156) that grizzlies are expanding with numerous occurrences documented south of Highway 200 but then states that "there are no known grizzly bear BAC" south of the highway. Appendix E of the Helena National Forest Plan (1986) provides direction for grizzly bear

¹ Some of this discussion includes areas west of the Continental Divide in FWP's Regions 3 and 4.

management outside of the Recovery Zone. It states that a BAC is an area with 10 years of verified grizzly bear activity with verified family group activity for 5 of those years. One area outside of the Grizzly Bear Recovery Zone south of Highway 200 currently meets these explicit criteria. The Ogden/Dalton Mountain Complex (including upper Nevada Creek) has been used consistently by several radio-collared grizzly bears since at least 2002. FWP has monitored 3 radio-collared grizzly bears (1 adult male and 2 females that have each had a least 1 litter). These bears annually use habitat within the drainages north and south of the ridgeline connecting and flowing from Ogden and Dalton Mountains. All 3 of these bears (including family groups) and other unmarked grizzlies have been documented spending considerable amounts of time utilizing these habitats south of Highway 200. In addition, 1 of the collared females successfully denned and birthed cubs on Ogden Mountain in 2010.

Grizzly bear activity is now occurring throughout HNF lands between the Blackfoot, Little Blackfoot and Prickly Pear watersheds. As a result, FWP recommends that the HNF implement best management practices for BAC management throughout the areas encompassed by the Blackfoot Travel Plan. For both action alternatives (Alt. 2 and 3), open-route and total-route density targets should be strictly adhered to within the US Fish and Wildlife Service (USFWS) Grizzly Bear Recovery Zone, and these densities should also be aspired to within HNF ownerships outside of the Recovery Zone one that are south of Highway 200.

Much more of the southern Lincoln Ranger District will qualify as a BAC in the near future. In the last 10 years FWP, US Forest Service (USFS) biologists, and the US Department of Agriculture's Wildlife Services (USDAWS) have verified grizzly activity throughout the southern portion of the Plan area. For example, south and east of the Continental Divide reports and sighting by agency personnel have increased:

- In 1996 and 1997 a radio-collared female grizzly was located on 3 occasions in the South Fork of the Dearborn River. Between 2000 and 2003, grizzly bear family groups were observed by USFS personnel on several occasions in Dark Gulch. In 2003 an unknown collared grizzly was filmed by USDAWS on a private ranch near Sieben (between Helena and Wolf Creek). In 2007 a sighting of a female grizzly with cubs was verified by USDAWS in Clark Creek south of Sieben. In 2008 a male grizzly was trapped by USDAWS in Wolf Creek. In the summer 2010 a radio-collared grizzly bear traveled south from the Seeley/Swan area to Avon, then to Marysville west of the Divide, and back north and east through the HNF to Lincoln before swinging back to Seeley Lake. In 2010 an unmarked grizzly was photographed at Mitchell Mountain by USDAWS during a helicopter flight. And in 2012, USDAWS set traps for a grizzly at a depredation in Little Prickly Pear Creek.
- Grizzly bears have also been consistently observed along the southwest portions of the HNF across the Avon Valley between Nevada Creek and the Little Blackfoot River basins. Between 1998 and 2002 USDAWS responded to multiple depredations by grizzly bear on domestic sheep (grizzly bear family groups and lone bears) near Nevada Lake. In 2001 a radio-collared grizzly's "cut collar" was discovered in Washington Gulch. In 2003 a sub-adult male grizzly was captured near Nevada Lake. Between 2008 and 2011, unmarked grizzlies were photographed in the Nevada Creek drainage, Threemile Creek, and along the Little Blackfoot River between Elliston and Avon. In 2011 USDAWS responded to grizzly bear depredations in Snowshoe Creek.

The Blackfoot Travel Plan area is exceedingly important to recovering grizzly bear populations in the southern NCDE. Grizzlies are sensitive to vehicular disturbance and road densities. Under both Alternatives 2 and 3, there are proposed motorized trails proposed for both sides of Highway 200. It should be noted again that roads open to Off-Highway Vehicles (OHVs, including 3- and 4-wheeled

ATVs and motorbikes) have similar impacts to sensitive wildlife species as do roads open to motorized highway legal traffic. Disturbance from OHVs may exceed that of other vehicles because they enable access to more remote areas, noise is greater, and vehicle speeds are generally higher. Forest roads open to highway vehicles also provide opportunity for OHV recreation, but dedicated OHV trails create additive disturbance.

The Rogers Pass/Continental Divide Corridor from Red Mountain to Flesher Pass is an important movement and dispersal zone for a variety of wildlife species including lynx, wolverine, and grizzly bear. FWP is pleased that this portion of the Continental Divide Trail (and some of the existing spur roads), under Alternatives 2 and 3, would be designated non-motorized in order to limit disturbance to wildlife and ensure the continued function of this important corridor. However, grizzly bears and other wildlife inhabiting or dispersing through this portion of the Continental Divide are still vulnerable as a result of the constriction of forest lands at this section of the HNF. This is one of the few spots in the Blackfoot watershed where forest lands provide direct connectivity between the NCDE and HNF lands south of Highway 200. Private lands on the east and west side of the Divide at Rogers Pass are only one mile apart at the HNF's narrowest point at Cadotte Pass. This stretch of uninterrupted forest land is, arguably, one of the most important wildlife corridors in the Crown of the Continent. FWP's question the wisdom of developing motorized trail systems on either side of the Highway 200 in this area.

The Bartlett Creek area north of Highway 200 is part of the Alice Creek bear management subunit within the Grizzly Bear Recovery Zone. Development of additional motorized recreation area in Bartlett Creek would impact grizzlies more seriously than routes in the Mike Horse area because of the latter's long history as a mining district, checkerboard ownership, and the fact that the drainage's northern aspect and heavier timber offers more security and hiding cover for wildlife. The existing road system in Bartlett Creek is currently closed to motorized travel, and grizzly bears are known to use the area extensively in the spring, summer, and fall for biscuit root and pine nut foraging. FWP does not recommend any new road construction or motorized trail designation on these (HNF's) recently acquired lands from Plum Creek Timber Company in and around the First Gulch, Bartlett Creek, and Cadotte Creek areas. FWP encourages the HNF to reroute this portion of motorized trail expansion to a trail near or adjacent to Highway 200.

The Mike Horse Creek motorized route would have less impact to grizzlies and other wildlife. FWP supports decommissioning the illegal motorized trails up Seven Up Pete Creek and developing the alternative motorized route between Hogum Creek and Stemple Pass--as long as the seasonal closures are enforced.

The proposed motorized route between the Black Mountain/Long Point road system, Lincoln Gulch and Beaver Creek is used by grizzly bears and other wildlife; FWP does not support its development unless fall closures are adopted and enforced. It is important that the Travel Plan be simple, consistent, and concise. It is also important that all 4 National Forests in and around the NCDE have similar summer travel management plans so as to avoid user confusion and to prevent the concentration of OHV use on one particular forest (adjacent forests largely limit wheeled OHV use to roads designated open for highway vehicle use).

The extent and potential impacts of the (nonmotorized) mountain bike trail systems proposed in both Alternatives 2 and 3 need to be more thoroughly described. FWP supports the enhancement of existing trails and roads to accommodate the use of bicycles, but does not support constructing new bike trails on the north slope of Black Mountain. Much of this area is within an inventoried roadless area, and we are concerned that development of a designated trail system would eventually lead to the need for more active management of the area. FWP is also concerned about constructing new bike trails along the south and north bench areas of Beaver Creek for the same reason and would prefer the trail use existing roads and

trails. We also discourage any new trail construction along the ridge system between Baldy Mountain and Crater Mountain southeast of Lincoln.

FWP does not support opening Road 4106-J2 on the north side of what is known as Bull Mountain in the upper reaches of Dry Creek for year-round motorized use (as proposed in Alternative 2). At least 3 different grizzlies have denned just over the top of the ridge in the head of Ward Creek, approximately ¼-mile from where this road ends at the ridgeline.

Fisheries and Hydrology

The Lincoln Ranger District (LRD), located in the headwaters of the Blackfoot Basin, is critical to the long-term conservation of native trout in Montana because this area harbors genetically “pure” native westslope cutthroat trout in most tributaries, as well as Threatened bull trout in several streams. Given the high conservation value of this area’s native trout, Alternative 3 is clearly the best Travel Plan alternative for the long-term recovery and security of native fisheries on the LRD. This determination is obvious given this Alternative’s potential to: 1) reduce sediment delivery to streams, 2) restore aquatic and riparian function, and 3) remove or improve water control structures associated with roads. Alternative 2 would provide relatively minor benefits compared to Alternative 3.

Mitigating the biological impacts of roads is among the most challenging aspects of maintaining high-quality native trout fisheries, both on and off the Forest. Road networks can directly alter hydrology, introduce sediment, and fragment habitat required for populations for native fisheries to persist at a landscape scale. Such impacts are clearly evident in FWP surveys on many waters on and off the HNF, and have been the focus of many years of ongoing remedial activities.

According to the DEIS about 197 miles of road would be decommissioned under Alternative 3 versus only 8 miles under Alternative 2 and none under Alternative 1. In addition, Alternative 3 would close about 566 miles of unauthorized roads and trails, reduce instream sediment by 38 tons per year (versus only 13 under Alternative 2), and would remove 121 culverts (versus only 17 under Alternative 2). Alternative 3 offers a rare opportunity to meaningfully reduce sediment Total Maximum Daily Load (TMDL) at a landscape scale and improve fisheries and other aquatic resources on the Lincoln Ranger District.

FWP suggests sediment-reducing projects (including road decommissioning) should focus on TMDL sediment-impaired streams (DEIS, p. 65), while also emphasizing priority streams supporting pure native trout (Pierce et al. 2005), especially bull trout. Such priority streams surround the broader Lincoln Valley and include Alice Creek, Arrastra Creek, Beaver Creek, Anaconda Creek, Willow Creeks, Poorman Creek, Sauerkraut Creek and the upper Blackfoot River.

FWP supports the decommissioning of crossings (e.g., p. 76) and/or replacement of undersized culverts using “stream simulation” concepts as developed by USFS hydrologists. The removal or improvement of road crossings should be a priority under the Travel Plan and could be coordinated with other ongoing collaborative efforts that are currently attempting to improve fisheries in priority streams that drain the National Forest. Tributaries to upper Nevada Creek, while important, are often hybridized with rainbow trout, providing relatively little biological benefit to the Blackfoot compare to those in the Lincoln Valley.

In addition to the above general comments, it may be that the 150-foot riparian buffer provides adequate protections for most streams associated with new roads as mentioned in the DEIS. However in sensitive riparian areas that support native trout communities, the 300-foot (INFISH) riparian buffer should also be

applied where appropriate. These might include bull trout streams, streams in alluvial valley bottoms, or streams with elevated (e.g., TMDL) levels of instream sediment.

FWP REGION 3

General Comments

FWP Region 3 offers the following comments (1 – 11) as background information and partial rationale for some of our recommendations (i – xv), which are farther below.

1. The area along the Continental Divide (CD) is important for wildlife. The CD functions as a wildlife movement corridor and provides habitat and habitat connectivity. This area is especially important for species such as wolverine, lynx, and grizzly bear.

Grizzly bear are sensitive to vehicular disturbance and road densities. FWP expects that grizzly bear continue to recolonize areas to the south of the recovery zone. Further, FWP expects that grizzly bear are not only occupying habitats along the CD but are also utilizing the CD corridor to move to other areas. Documentation includes the following:

- An adult grizzly was documented in the upper Boulder River area in spring 2012, and another sighting was documented in the Four Corners/Lockhart Meadow area along the CD in spring 2011.
- In 2010, a male grizzly bear was killed in Elk Park, and through genetic testing it was determined that this bear was from Glacier National Park.
- In 2006, an adult male grizzly from the NCDE was poached on the Mount Hagan Wildlife Management Area south of Anaconda.
- In 1980, a black bear hunter illegally harvested an adult male grizzly near Garrison Junction.

There have been numerous wolverine sightings on private land adjacent to the HNF near Flesher Pass, and wolverine and lynx have been confirmed as far south as Jericho Mountain and Basin Creek.

FWP would support your efforts to conserve this important movement corridor and habitat connectivity along the CD, and therefore FWP supports decommissioning the following routes as proposed under Alternative 3:

- 4087
- 4088, 4088-A1, 4088-A2
- 1827-J3
- 1840, 1840-B1
- 1825-A1
- 1819, 1819-A1, 1819-B1, 1819-C1 (presumably “C1”; it was labeled on the scoping maps but not on the DEIS maps), 1819-D1
- 1827 in sections 24, 25 and 26; 1827-F1, 1827-G1, 1827-H1, 1827-H2 and 2 unlabeled spurs in the same area
- U4133, U4133A, U4133B and 2 unlabeled routes in the area

- 4089, U-4089
- U-052
- U-053
- U-054
- U-4133, U-4133A, U-4133B and 2 unlabeled routes in sections 23 and 26
- Unidentified spur in T13N R07W S35

Further, FWP supports yearlong closure and “storage”² of the following routes as proposed under both Alternative 2 and 3.

- 1827-II
- 1827-C1
- 1006-A1
- 601-L3
- 4133, 4133-A1; 4133-A1 is a dead-end spur off the CD nonmotorized trail (as proposed under Alternative 3)
- 601-N2, 601-N5 and unlabeled spurs
- 601-L1, 601-M1
- 601-L3
- 1827-K1

FWP supports designation of Route 440, which follows the crest of the CD, passes through roadless areas and is a section of the CD National Scenic Trail, as non-motorized under Alternative 3. Therefore, we also support decommissioning of motorized Routes 1840-B1 and 1825-A1, which overlap Route 440 under the existing condition.

2. Due to the epidemic bug-kill across the HNF, the condition of the Forest will be vastly different in the not too distant future. This presents obvious management challenges for the HNF as a land manager and FWP as managers of Montana’s fish and wildlife populations. This will directly impact security cover, hiding cover, and thermal cover. We are particularly concerned with the reality that many elk herd units are below standards for security and thermal cover and that conditions may decline after the implementation of the HNF’s recent *Forest-wide Hazardous Tree Removal and Fuels Reduction Project*. FWP would like to know, how much of the Hazard Tree Project been implemented, and where do the elk herd units stand in comparison with respect to the standard post-treatment?

3. FWP is at present coordinating with the Lincoln Ranger District biologist to develop accurate elk herd unit boundaries east of the CD. The boundaries of the elk herd units east of the CD as presented in the DEIS do not incorporate elk herd use areas year-round, during winter, or during fall. To our knowledge, the boundary of the existing “elk herd units” east of the CD were not generated with input from FWP biologist(s) for any of the iterations listed in the DEIS (2003, 2004 or 2011). The recommendations from the joint FWP-USFS Working Group for this new habitat security model/standard included an analysis area that captured elk herd use during: 1) the fall, or 2) year round if fall-use areas were not able to be determined with current data and information, or 3) watershed if it was not possible to determine either fall- or winter-use areas. FWP strongly disagrees with the boundaries as they are presented in the DEIS, because FWP has

² In the HNF scoping document and DEIS, “the ‘storage’ classification would count as an effective closure [to motorized use] only if the first ¼ mile of the road was ripped and berms put in place.”

documented extensive and continual elk habitat use far from the Forest Service boundary during both fall and winter. A much broader area must be incorporated into the existing elk herd units to capture year-round and/or fall use areas of elk. With this updated information, FWP will be able to evaluate the proposed big game security amendment, how the three alternatives will, or will not, provide adequate security cover, as well as hiding cover and thermal cover, and the Travel Plan as a whole. FWP appreciates that the HNF is trying to establish a better metric for big game security, because during scoping for this Travel Plan FWP asked what long term plans the HNF had for bringing the Forest into compliance with big game standards, and more specifically, asked how this Travel Plan would assess and address big game security standards. However, FWP needs the opportunity to review an analysis that utilizes elk herd unit boundaries that reflect elk herd use either year round or during fall. Changing the big game security standard to come into compliance is not sufficient in and of itself; the standard must adequately conserve secure habitat.

4. It is appropriate to have varying seasonal closure dates with respect to resource management, not only to prevent soil disturbance and erosion in the spring or in wetland areas but also to meet a variety of wildlife requirements at different times of the year and to increase recreational enjoyment of the resources. While your travel planning objectives include simplification, FWP would be concerned about creating seasonal closures that may be too broad or ineffective at meeting wildlife requirements.
5. On the existing condition map distributed with the DEIS, Route 1819 was identified as an Open Highway Legal Vehicles route, but it is not legally accessible for the public from any other motorized route. FWP fully supports decommissioning of the following routes as proposed under Alternative 3.
 - 1819, 1819-A1, 1819-B1, 1819-C1 (presumably, it was labeled on the scoping maps but not on the DEIS maps), 1819-D1
6. FWP supports decommissioning the following redundant and non-arterial routes and dead-end spurs to improve wildlife security as well as the integrity of the CD wildlife corridor under Alternative 3:
 - 1827 in sections 24, 25 and 26; 1827-F1, 1827-G1, 1827-H1, 1827-H2 and 2 unlabeled spurs in the same area
 - U4133, U4133A, U4133B and 2 unlabeled routes in the area
 - U-057, a private-land only connector
 - 1840, 1840-B1
 - 1825-A1
7. FWP supports managing roadless areas (RAs) as both roadless and non-motorized. “Non-motorized” should exclude all motorized vehicles, including snowmobiles and over-snow vehicles. FWP would support the HNF’s decision to decommission the following motorized routes within and adjacent to RAs under Alternative 3:
 - 4089 and U-4089
 - U-051
 - U-052
 - U-1815
 - 1828, 1828-A1, 1828-B and additional unlabeled spurs in T14 NR07W S31 and 32

- 4088, 4088-A1 and 4088-A2; these routes have already been naturally reclaimed, and FWP is pleased to see the Forest Service take them off the travel system under Alternative 3.
8. FWP supports the HNF intent to exclude “unauthorized”/user-created routes that have been identified to date, as well as those that may be created or discovered in the future, from the forest transportation system. FWP would prefer that unauthorized routes not be incorporated into the forest transportation system; FWP thinks that incorporating such routes will send a message to the public, including landowners in the area, that this is an acceptable practice. Over 156 miles of unauthorized routes were identified on the Lincoln Ranger District throughout this travel planning process. If unauthorized routes are incorporated into the forest transportation system in the Record of Decision, FWP would be interested to know what that decision for each route was based upon.

Route U-1827 is proposed as a non-motorized trail, the lower end of which connects directly to private land. However, it is also proposed under both Alternative 2 and 3 that a motorized trail, U-New-1006, be constructed to the end of U-1827 on public land. FWP recommends that U-1827 be obliterated. If that is not possible, then FWP recommends that Route U-New-1006, which is about 1/3-mile in length, be non-motorized instead of motorized. FWP makes this recommendation because we are aware of continued and increasing illegal motorized use in this problem area, which has not been enforced by the HNF.

Route U-1884 is less than ¼ mile in length and is proposed as a Motorized Highway Legal Vehicle route, currently designated as a motorized trail, to a parcel of private land under both Alternative 2 and 3. FWP recommends that the route remain a motorized trail if possible.

FWP would support the HNF’s decision to decommission the following unauthorized routes under Alternative 3, which link directly to the CD. Decommissioning will improve habitat security and the integrity of the CD wildlife movement corridor.

- U-053
 - U-054
9. The unlabeled orange-yellow route in T12N R07W S9 on the east side of the divide has the same designation as the existing condition. Was there some other change intended for this route?
10. FWP supports the HNF’s yearlong closure and “storage”³ of the following routes as proposed under both Alternative 2 and 3. FWP thinks that obliteration will be necessary at the entrance to reduce illegal motorized use in this problem area.
- 1827-I1
 - 1827-C1
 - 1006-A1
 - 601-L3, connects private lands parcels only

RECOMMENDATIONS

³ In the HNF scoping document and DEIS, “the ‘storage’ classification would count as an effective closure [to motorized use] only if the first ¼ mile of the road was ripped and berms put in place.”

- i. Open-route and total-route density targets designated for the grizzly bear recovery zone should be aspired to within HNF ownerships outside of the recovery zone, south of Highway 200.
- ii. In the HNF Scoping Document and DEIS, HNF acknowledges that gates do not constitute 'effective closures' for motorized access—however, "storage" south of Highway 200 would use gates under either Alternative 2 or 3. FWP recommends that the "storage" policy proposed for routes north of Highway 200, which includes ripping the first ¼ mile of road and putting in berms, be implemented for routes south of Highway 200 as well. FWP thinks that this will be necessary to curb illegal motorized use, especially in areas where we are observing a continuing and increasing problem and lack of enforcement by the HNF, such as the Stemple Pass Road area east of the CD.
- iii. Arterial routes should be capitalized on for dual use by both legal highway vehicles and OHVs. Roads open to Off-Highway Vehicles (OHVs, including 3- and 4-wheeled ATVs, UTVs, and motorbikes) have similar impacts to sensitive wildlife species as those open to general vehicular traffic. Disturbance from OHVs may exceed that of other vehicles when they enable access to more remote areas, noise is greater, and vehicle speeds are generally higher. It should be recognized that forest roads open to highway vehicles also provide opportunity for OHV recreation. Dedicated OHV trails are additive to that opportunity and disturbance.
- iv. FWP recommends that redundant and non-arterial routes and dead-end spurs be closed yearlong, remain closed yearlong, be put into "storage", or be decommissioned to maintain or improve wildlife security. Grizzly bear activity in the area continues to increase, and reducing the extensive motorized routes in this landscape will be key to providing functional habitat for them. FWP recommends decommissioning of the following routes, which are slated for storage with a gate at present under both Alternative 2 and 3.
 - 1881-A1, slated for closure under both alternatives, a dead-end spur about 1/3-mile in length that parallels an Open Highway Legal Vehicle route in a problem area for illegal motorized use
 - 601-N2, 601-N5 and unlabeled spurs; all 1/3-mile or shorter length and parallel to Open Highway Legal Vehicle Routes
 - 601-L1, 601-M1; redundant, already private land access from different point off Open Highway Legal Vehicle route; 601-L1 comes off CD
 - 601-L3, redundant, other access to private land, private land connector only
 - 1827-K1, 1/3-mile long spur off CD non-motorized trail, dead ends
 - 1827-J2, dead-end, redundant route with three spurs that lead to the CD, and parallel to Open Highway Legal Vehicle Route

Further, FWP recommends reducing road density in T13N R07W at Granite Butte by closing dead-end spur routes and motorized trails. FWP supports closure for Granite Butte Routes 4133 and 4133-A1 and supports decommissioning of Routes U-4133, U-4133A, U-4133B and 2 unlabeled routes in sections 23 and 26. FWP would be supportive of the HNF's efforts to decommission redundant and non-arterial routes and dead-end spurs where priority allows and hopes the HNF will consider obliterating the entrance to 4133 if illegal motorized use continues to be a problem.

Route 1827 is slated for closure in section 3 from September 1– June 30 under Alternative 3. This section of the route from Stemple Pass to its proposed closure in section 3 extends about 1.5 miles along the CD, and due to the switchbacks in section 3, is over 3 miles long. FWP thinks that leaving this route open through to section 3 is not beneficial to hunters and may be detrimental to their success given the route density because of the tight switch backs and because the route is nearly mirrored immediately west of the CD by Route 1841, which is slated as an Open Highway Legal Route under the existing condition and both Alternative 2 and 3. FWP recommends that Route 1827 be closed at Stemple Pass beginning on September 1. Additionally, this would help improve the wild character of the area immediately north of Stemple Pass Road compared to the more heavily roaded area immediately south of the Stemple Pass Road, thus providing for differing recreational hunting opportunities in the same vicinity.

- v. FWP would support formal designation of the CD trail as non-motorized through Specimen Creek RA, Roger's Pass Anaconda Hill RA, Lewis and Clark/Alice Creek RA, and the Nevada Mountain RA.
- vi. In our 2009 and 2011 letters, FWP requested that motorized use be reduced in the vicinity of the CD to reduce impact on wildlife in the corridor. We continue to recommend reducing motorized use along the CD, and we support designation of Route 440, which follows the crest of the CD and passes through a roadless area, as non-motorized under Alternative 3.
- vii. FWP recommends that adequate signing be placed at likely illegal motorized entry points to the Anaconda Hill RA along Route 1807.
- viii. In general, FWP supports decommissioning of roads and removal of stream crossings. An inventory of existing road crossings would allow prioritization of crossings in crucial habitats and identify culverts and/or crossings that disrupt connectivity within stream habitats. Crossings without appropriately sized culverts should be replaced with crossings adequate for fish passage and flushing flows, or the crossings should be removed completely.
- ix. Elements specifically listed in the Proposed Alternative that influence bull trout and/or westslope cutthroat trout species include moving Route 4134 on the South Fork of Poorman Creek and new construction on Route 1006 to Rooster Bill Gulch. Removal of multiple crossings on Route 4134 would benefit not only bull trout but all species present in the stream. Rooster Bill Gulch contains a Conservation Population of westslope cutthroat trout, and as a result, FWP recommends against constructing a new crossing of that stream and questions the necessity of a new road. Construction of a new road in the drainage could potentially further degrade cutthroat habitat through increased sedimentation and runoff from the new road. If a road crossing is constructed, it should be done in a manner to accommodate fish movement to avoid further fragmentation of the population; it is unclear from the Travel Plan documents whether stream crossing is planned.
- x. For wildlife security, FWP supports a uniform September 1 to June 30 closure period, which corresponds with the opening of some hunting seasons (e.g., deer and elk archery and fall black bear seasons), as proposed under Alternative 3 over the dual closure dates of September 1 and October 15 for different routes as proposed under Alternative 2. The September 1 closure date would then also be consistent with closure dates on the Lewis and Clark National Forest. FWP supports the September 1 – June 30 closure for Route 1827 but recommends closure at Stemple Pass.

- xi. April 1 is the date commonly accepted by land managers as the spring emergence date for grizzly bears in the Northern Continental Divide Ecosystem. FWP recommends at least an April 1 – December 1 closure to snowmobile use. In the spring, our concerns include grizzly bear emergence and wolverine natal denning, and in the fall our concern is overland travel at higher elevations, or lower elevations in the event of early winters, and the impact that may have on wildlife security during some hunting seasons (e.g., deer and elk archery and fall black bear seasons).
- xii. In general, FWP supports consistency in closure/opening dates across the HNF and with adjacent Forests, provided that resource concerns are met or exceeded.
- xiii. In the US Forest Service HNF Plan, Granite Butte is a proposed Research Natural Area (RNA). FWP supports reduction in motorized use in this area under Alternative 3, and FWP would be supportive of official RNA designation, because this is an important piece of the wildlife corridor.
- xiv. FWP supports the Forest Service's efforts to eliminating roads that provide exclusive access to private land or private landowners wherever possible.
- xv. FWP recommends that unauthorized routes be decommissioned.

PARKS DIVISION

Motorized recreation (primarily OHVs) has grown significantly in Montana since 2000. When Montana's permanent vehicle registration provisions went into effect in 2003, keeping accurate records and statistics on OHVs changed. The best information available today, however, indicates there are now 70,000+ OHVs registered in Montana. This, along with the increasing nonresident OHV use in Montana, indicates that interest in motorized outdoor recreation in areas such as this will likely only increase over time.

Both Alternatives 2 and 3 maintain the traditional motorized recreational use that has developed in the area over the past two to three decades; however, Alternative 3 provides the best balance of protecting and improving the area's fish and wildlife resources and providing both motorized and non-motorized recreational use.

The following are some general but important points related to the proposed Travel Plan;

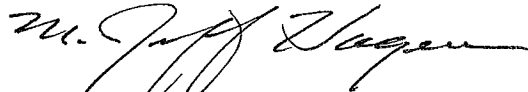
- The US Forest Service should prioritize and dedicate the necessary management resources to the project's implementation. This includes on-the-ground recreational management, education and enforcement efforts, weed control, and similar management activities which will be of benefit to the Travel Plan, the public, and the land base.
- The requirement of restricting motorized vehicles to designated routes only is appropriate and the backbone of the Travel Plan.
- There will be cases where it may be appropriate for OHV riders to utilize the US Forest Service roads as connector routes between designated motorized trail systems. Where and when this is appropriate, the Travel Plan should acknowledge these specific locations and thus designate the Forest Roads as such to allow legitimate OHV travel on them.

- Loop trail systems are important for OHV riding opportunities. Whenever possible, trail loops should be planned so recreationalists have a place to ride to, a satisfying experience, and easily end up back where they began. Not only does this provide the outdoor recreational experience most riders' desire, but it likely reduces the likelihood that people will seek to create their own routes, find fault in the management decisions that created the loop system, and similar factors. Looped trail systems provide the opportunity for riders to do the right thing from the start.
- Where appropriate, connector trails between loop trail systems should be considered and implemented. It is one more way to plan and design a motorized trail system that users will respect and utilize. Defined connectors between existing road systems, the designated motorized trail loops in a specific area or drainage, the popular area campgrounds or camping areas--they are all important to recreationalists seeking a motorized outdoor experience in the area.
- Clear and concise route mapping is important. The information should convey the designated trail usage, vehicle width restrictions (single-track motorized vs. 50" width), any seasonal closures, and similar information.
- It will be important to provide appropriate signage, maintenance of signage, and improvements to the area signage as the new Travel Plan is implemented.

CONSULTATION

For further consultation or questions concerning FWP's comments, please feel free to contact Rob Brooks (phone 406-444-5786 at our office, robbrooks@mt.gov) or the appropriate area personnel listed in the attached Consultation Details section (next page, with References Cited). Thank you for providing the opportunity for FWP to comment on this Travel Plan.

Sincerely,



M. Jeff Hagener
Director

JH/sr

c: Amber Kamps, Lincoln District Ranger, Helena National Forest
Mack Long, Sharon Rose, Pat Flowers, Rob Brooks, Chas Van Genderen

CONSULTATION DETAILS

For specific consultation regarding these Travel Plan comments, please feel free to contact the following FWP personnel:

Wildlife

West of the Divide: Blackfoot area wildlife biologist Jay Kolbe (phone 406-210-9830; jkolbe@mt.gov; PO Box 1288, Seeley Lake, MT 59868).

East of the Divide: Wildlife biologist Jenny Sika (phone 406-495-3268; jsika@mt.gov; PO Box 200701, Helena, MT 29620-0701).

Fisheries

Blackfoot area fisheries biologist Ron Pierce (phone 406-542-5532; rpierce@mt.gov; 3201 Spurgin Rd., Missoula, MT 59804).

Parks

Montana State Parks assistant administrator Tom Reilly (phone 406-444-3752; treilly@mt.gov; PO Box 200701, Helena, MT 59620-0701).

REFERENCES CITED

MFWP (Montana Department of Fish, Wildlife and Parks). 2004. Montana statewide elk management plan. MFWP, Helena.
<http://fwp.mt.gov/fishAndWildlife/management/elk/managementPlan.html>. Accessed 3 March 2013.

Pierce, R., R. Aasheim, and C. Podner. 2005. An integrated stream restoration and native fish conservation strategy for the Blackfoot River basin. Montana Department of Fish, Wildlife and Parks, Missoula.

USDI (US Department of Interior, Fish and Wildlife Service) and USDC (US Department of Commerce, US Census Bureau). 2006. National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.

