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Email: comments-northern-helena-helena@fs.fed.us

Helena Ranger District
2880 Skyway Drive
Helena, Montana 59602

September 26, 2014

DIVIDE TRAVEL PLAN - ALTERNATIVE 5 and BIG GAME SECURITY FOREST PLAN AMENDMENT – ALTERNATIVE B

Members of Helena Hunters and Anglers Association (HHAA), and the Clancy Unionville Citizens Task Force (CUCTF) have been involved in Helena National Forest land management issues for more than two decades.

Helena Hunters and Anglers submitted comment on the Divide Travel Plan draft EIS on May 23, 2014. Comment was submitted on the Divide big game security Programmatic Amendment, Alternative A on May 20, 2014 by HHAA along with CUCTF, Anaconda Sportsman's Club, and the Montana Wildlife Federation. All of the above entities wish to comment on Alternative 5 of the Divide Travel Plan along with associated big game security amendment Alternative B.

We are encouraged with the Helena Ranger District's effort to finally bring this travel plan that has languished for more than ten years, across the finish line. Thank you for this opportunity to comment.

Alternative 5

After all these many years, natural resource concerns that we have expressed, are finally being more adequately addressed by Alternative 5. Over and above the other alternatives in the DEIS, water quality, soil and vegetation health, and fish and wildlife habitats, would all be well served by Alternative 5,.

30' – 70' Rule

The previous rule that has allowed driving 300 feet off of roads for camping, has resulted in resource damage (mud bogging, riparian zone damage, erosion, weed spread, fish and wildlife habitat deterioration) along roads throughout the Helena National Forest. Alternative 5 would be a huge improvement over the existing rule for the Divide Landscape in that it would reduce the area of impact to 30 feet for vehicle parking, and to 70 feet if a camping trailer is involved.

A combination of denuded roadsides as a result of the Hazard Tree Removal Project and the existing rule to allow motorized use for 300 feet on both sides of the road conspire to allow motorized access to potentially impact 73 acres for every mile of Forest Service road. (Photos available to show this synergistic effect.) Currently there are a minimum of 2180 miles of road on the Helena National Forest.¹ The Divide

¹ Roads Analysis Report, 2004. Helena National Forest. 112 pg and 488 pgs appendices.

Alternative 5 proposal to allow for 30 to 70 feet of off-road camping would reduce impacts by at least 75 percent.

Designated Dispersed Camp Sites

We agree with Alternative 5's approach in designating Dispersed Camp Sites, i.e. those campsites that are presently in use that exceed the 30-70 foot rule. Modifications to those sites are encouraged so that impacts to water quality or riparian zones can be minimized.

Duplicative Roads

Big game security, habitat effectiveness, winter ranges and other wildlife habitats have been severely compromised over the decades as a result of dead-end and duplicative roads. We applaud Alternative 5 for closing most of these redundant routes.

One of the worst locations for motorized impacts has been in the mule deer and moose winter range of Sweeney Creek in the Priest Pass area that we have expressed concerns about for years and years (correspondence available). Alternative 5 would rectify this abuse that would ultimately result in restoration of important wildlife winter range with designated driving routes yearlong, and no off-road use. The upper Dog Creek-Snowshoe area is replete with a spaghetti maze of roads. Significant improvements to bolster big game security are made in Alternative 5 by closing roads that create larger patches of security areas. As the Programmatic amendment explains, not a single elk herd unit yet reaches the minimum goal of 50% security. However, improvement in security of about 44% would be realized with Alternative 5 over the existing condition, and about 21 percent over the next best alternative.

Wildlife Movement Corridors/Linkage Zones

The Divide Travel Plan straddles the Continental Divide and therefore has important consequences for wildlife movement corridors and linkage zones. A swath of country paralleling the Continental Divide, and secondary routes connecting the Divide to the Elkhorns (Black Mountain-Chessman, and upper Tenmile to the Boulder Hill) would be substantially facilitated with implementation of Alternative 5 – particularly where road density is diminished in the Snowshoe, Dog Creek, Upper Little Blackfoot, and Tenmile drainages, thus reducing habitat fragmentation.

Wildlife movement and genetic linkage zones occur along the Divide and across Highway 12 for lynx, wolverine, and grizzly bears (Wildthings Unlimited tracking information and MFWP records). Therefore minimization of forest road density both to the north and south of Highway 12 as per Alternative 5 is in the best interest of long-term maintenance and enhancement of these species.

Alternative 5 supports the farsighted Resolution 2008-57, of the Lewis & Clark County Commission, entitled "*Resolution to Protect and Promote the Conservation of Wildlife Habitat and Corridors along the Continental Divide*" (dated June 5, 2008) that recognizes the importance of maintaining the wild character of the Continental Divide as a backdrop for the Capitol City of Helena and the wildlife that inhabit it. (Resolution attached)

Roadless Areas

From the Nevada Mountain Inventoried Roadless Area at the north end of the Divide Travel Planning Area to Electric Peak IRA on the south, Alternative 5 would most effectively rehabilitate the battered country of the Divide landscape by reducing road density and yet provide 330 miles of drivable routes. Alternative 5 would help to reconsolidate islands of non-motorized winter range (Sweeney Creek, MacDonald Pass), big game security areas, and roadless areas in between (Jericho and Lazyman).

Alternative 5 would be a responsible step not only toward rehabilitation of the landscape, but for wildlife habitats and the animals themselves, and for recreationists of all types from motorcyclists to walkers who value and appreciate healthy, natural landscapes.

Inventoried Roadless Areas and their value to wildlife and watersheds would be enhanced by reducing poorly placed and often duplicative motorized routes. With the exception of MTR-501 between Limburger Springs and the Little Blackfoot, it is encouraging that Inventoried Roadless Areas would in fact be managed as roadless.

Although the east side of the Nevada Mountain Roadless Area (upper Little Prickly Pear Creek) is not included in this decision, it was originally part of the Divide landscape before it was split off for the Soundwood decision, so the east face of Nevada Mountain Roadless Area should eventually receive winter travel management that would be consistent with the adjoining Blackfoot winter travel plan to the west, and Alternative 5 of the Divide travel plan.

Water Quality and Fisheries

The “Helena National Forest holds the dubious distinction of having the worst watershed conditions of all national forests and grasslands in Montana and portions of Idaho and the Dakotas.”²

It only takes one mile of road per square mile to begin damaging fisheries³.

Alternative 5 does far more to correct water quality problems (and by inference, fisheries concerns) as identified in the Helena National Forest Roads Analysis (2004) than any of the other Alternatives and we applaud that effort. “Watershed and aquatic resources were determined to be the resources at greatest risk from road-related impacts. Generally speaking, aquatic health depends upon watershed health.”⁴

Four of the Helena Forest’s Top 10 roads with the highest mileage in erosive soils occur in areas along the crest of the Continental Divide in the Bullion Parks area (Rd 1863 – 6.9 mi), Telegraph Creek (Rd 495 – 5.6 mi), Hahn Creek (Rd 1856 – 5.4 mi), and Banner Creek (Rd 1876 – 5.1 mi). All of these roads would be at least partially addressed in Alternative 5.

Two of the Helena Forest’s Top 10 roads with the highest mileage of slide-prone soils occur in the Sweeney-Priest Pass area (Road 335 Priest Pass), and Dog Creek (Road 1855). Both of these areas would be addressed through Alternative 5.

Two of the Forests top ten roads affecting wet soils occur in the Divide Landscape including Elliston-Spotted Dog Road 314 (3.3 mi), and Minnehaha Creek Road 527 (3.3 mi). Both of these roads would be addressed in Alternative 5. While there are seven high risk watersheds listed in the 2004 HNF Roads Analysis report in the Divide landscape including: Upper Blackfoot, Austin, Tenmile, Ophir, Snowshoe, Dog, Telegraph, all would receive beneficial watershed treatment through Alternative 5.

² **Helena watershed conditions worst in region.** November 26, 2011 12:00 am • By EVE BYRON Independent Record

³ *Washington Watershed Restoration Initiative; Tom Erkert, Forest Service engineer; USFS; Chris Frissell, ecologist with Pacific Rivers Council; Mary Ann Madej, USGS sediment specialist*

⁴ Roads Analysis. Ibid.

Continuity between Travel Management Areas

Integrity of travel management in adjoining Clancy-Unionville area will be assured through similar management on both sides of the Tenmile Divide. One concern is the proposal to open route 4009-A1 to vehicles 50" or less to motorized use. This route parallels, within 1/4 mile, another open motorized route, and goes through an elk calving/nursery area. At the least this route should be closed until after the calving/fawning/nursery period has passed.

BIG GAME SECURITY FOREST PLAN AMENDMENT – ALTERNATIVE B

We applaud recognition of the actual big game hunting season dates of 9/1 - 12/1.

HHAA has submitted extensive comment regarding big game security. We feel strongly that any big game security standard must involve "cover." Alternative B is a significant improvement over Alternative A that was described in the Divide Travel Plan DEIS.

Because natural function of the Divide landscape has been severely compromised by decades of resource extraction (mining, timber harvest) that has been accompanied by creation of roads and thus substantial destruction of wildlife and fisheries habitats, Alternative B for big game security, in conjunction with Alternative 5 for the travel plan, would be a large step toward rectifying past landscape and habitat damage.

We vigorously endorse Alternative B in recognizing that vegetative cover is an important component of big game security. Alternative B recognizes that security areas are limited, and should be improved where possible. It recognizes concealment cover and that management should retain or improve cover when possible. Alternative B provides for Intermittent Refuge Areas that are defined as areas at least 250 acres in size but less than 1000 acres, also at least 1/2 mile from a motorized route open to the public between 9/1 and 12/1. The term "Intermittent" suggests ephemeral, so clarification of that term to provide for long-term presence of Refuge Areas should be clarified while the minimum goal of 50% security is being pursued.

Since *none* of the Elk Herd Units (EHUs) within the Divide landscape currently meet the 50% security goal, the Montana Wildlife Federation, Helena Hunters and Anglers, and Anaconda Sportsman's Club would like to see language that strives toward providing as much vegetation cover on the landscape as is possible to achieve the minimum goal of 50% big game security in the Divide Travel Planning area.

It is no wonder that the existing Forest Plan big game security standard no longer functions, and that the Helena Forest feels they must devise another standard because there are more than 2,100 miles included in 1,678 inventoried roads on the Helena National Forest. Of these, 62.3% or 1,045 roads rank High as impacting either elk winter range or elk-road densities concerns, or both.⁵ It is clear that a combination of reducing roads (Alternative 5) and providing

⁵ Ibid.

vegetation cover (Alternative B) is crucial in reestablishing big game security as well as creating a livable landscape for all other wildlife.

Travel plan Alternative 5, working in conjunction with big game security amendment Alternative B would enhance security over and above Alternatives 1, 2, 3, or 4 in four of the six EHUs within the Divide landscape.

With suggested modifications listed above, we encourage the Helena National Forest and Helena Ranger District to select, implement and enforce Divide Travel Plan Alternative 5, and Forest Plan Programmatic Amendment Alternative B for big game security,.

We sincerely appreciate the opportunity to comment on Alternative 5 and Alternative B. Thank you.

_____/s//
Gayle Joslin, Board Member
Helena Hunters and Anglers Association
219 Vawter Street
Helena, MT 59601
joznpoz@bresnan.net

_____/s//
Kathy Lloyd, Chair
Clancy-Unionville Citizens Task Force
503 State Street
Helena, MT 59601
drakekath01@gmail.com

_____/s//
Chris Marchion, President
Anaconda Sportsman's Club
2105 Garfield
Anaconda, MT 59711
cjmachion@outlook.com

_____/s//
Nick Gevock, Conservation Director
Montana Wildlife Federation
5530 N. Montana Ave.
Helena, MT 59602
ngevock@mtwf.org

Attachments: Lewis & Clark County Resolution 2008-57

cc: Helena Forest Supervisor Bill Avey
Natural Resource Adviser to Senator Jon Tester, Eric Nylund
USFWS Field Supervisor, Jodi Bush

RESOLUTION 2008 -57

**RESOLUTION TO PROTECT AND PROMOTE THE CONSERVATION OF
WILDLIFE HABITAT AND CORRIDORS ON THE CONTINENTAL DIVIDE**

WHEREAS, the Lewis and Clark County Commission (Commission) is responsible for protecting and promoting the general welfare of Lewis and Clark County's residents for present and future generations; and

WHEREAS, the Continental Divide in Lewis and Clark County is home to wildlife populations and wildlands that are treasured and used by Lewis and Clark County's residents; and

WHEREAS, the survival of wildlife inhabiting the Continental Divide is contingent upon providing sufficient habitat and preserving key movement corridors for wildlife on the Continental Divide; and

WHEREAS, the Continental Divide represents one of the most critical wildlife corridors in the contiguous United States; and

WHEREAS, one of the most fragile and threatened segments of the Continental Divide's wildlife corridor is in Lewis and Clark County.

IT IS HEREBY RESOLVED, that:

1. The Commission hereby formally recognizes the unique and priceless value of the Continental Divide's wildlife populations and wildlands to the residents of Lewis and Clark County.
2. The Commission hereby agrees to advocate for the continued conservation of wildlife populations, habitat, and movement corridors on the Continental Divide.
3. The Commission hereby urges all federal and state land and wildlife management agencies to protect and enhance wildlife populations, habitat, and movement corridors on the Continental Divide in Lewis and Clark County.

DATED this 5th day of June 2008.



Lewis & Clark County

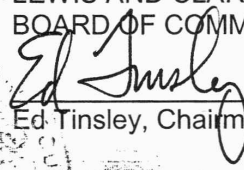
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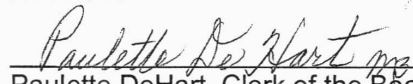
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LEWIS AND CLARK COUNTY
BOARD OF COMMISSIONERS


Ed Tinsley, Chairman

ATTEST:


Paulette DeHart, Clerk of the Board

