



**Attn: Liz Van Genderen
Helena National Forest
2880 Skyway Drive
Helena, MT 59602**

January 15, 2016

HELENA-LEWIS & CLARK NATIONAL FOREST DESIRED FUTURE CONDITION

Comments submitted here largely apply to the Helena portion of the newly merged (within the last two weeks) Helena National Forest and Lewis & Clark National Forest.

Background

The Helena Hunters and Anglers Association (HHAA) has been actively involved with issues on and management of the Helena National Forest for more than a decade, and individual members have routinely participated in Forest Planning and management for more than 30 years, i.e. before inception of the Helena Forest Plan in 1986. Our membership is comprised of hydrologists, archeologists, wildlife and fisheries biologists, land management professionals, philosopher/historians, forest managers, social professionals, fire fighters, aircraft pilots, tradesmen, and at the same time, all of us are hunters, fishers, hikers and advocates for naturally functioning ecosystems. We also are concerned about climate change, and thus how carbon sequestering national forests are maintained, nurtured and managed to provide this important service in the northern hemisphere.

Having such deep history, we believe we offer a long-term perspective that merits serious consideration. We very much appreciate the opportunity to participate in the planning and management of the Helena Lewis & Clark National Forest and believe that we, as a diverse collection of individual members, have perspectives that merit at least equal consideration as any selected group of individuals who may be appointed to collaborative or advisory committees.

Our mission statement is as follows: 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.

Overview

The format of this document made it very difficult to comment on behalf of wildlife. It directs the reader to go to the Terrestrial Vegetation section to discern whether benefits or impacts

may accrue to wildlife. This is clearly not a user-friendly approach and defeats the purpose of soliciting meaningful public comment. The following, which we believe is an untenable format, is how the document directs reviews to consider wildlife issues:

“Wildlife habitats depend on terrestrial vegetation, so it follows that the desired conditions for terrestrial vegetation are, for the most part, also desired conditions for wildlife habitats. Some specific references to wildlife habitat needs are included in the desired conditions for terrestrial vegetation above. Desired conditions for wildlife are described below where specific, fine-filter plan components may be required, or for needs that exist separately from the described vegetation desired conditions. Desired conditions for wildlife are relevant at differing scales, including across the entire plan area (forestwide desired conditions). Because the HLC NFs span a large area with a wide diversity of habitat types, and because not all wildlife species and habitats naturally occur in all parts of the plan area, some desired conditions are discussed only for certain geographic areas, in the appropriate sections of this document. Forestwide desired conditions are split into sub-sections: desired conditions relevant to management of all wildlife species or habitats, those specifically relevant to threatened, endangered, proposed, or candidate species, those specifically relevant to species of conservation concern, and those relevant to other species that may be of specific management interest.” (pg 24)

HHAA inquires: Would you, the reviewer of the Desired Conditions document, be able to decipher this? We went to the HLCNF Assessment (January 2015) to try to cross-reference to the Desired Condition document but there were few direct connections from wildlife to Desired Conditions for Terrestrial Vegetation.

In addition, your assessment that “Wildlife habitats depend on terrestrial vegetation” is too simplistic. *Secure, and thus useable*, wildlife habitats depend on more than what is growing on a site. Thus wildlife habitats need to include clearly defined commitments to provide such things as: wild land retention components, canopy coverage, and non-motorized/non-mechanized management strategies. Simply put, wild land retention for wildlife is an essential desired condition.

We have done our best, given these constraints, to provide our perspectives regarding Desired Conditions that are being proposed for Vegetation, Air, Water, Recreation, Social issues, and then for Desired Conditions that are not reflected at all, for wildlife. Our comments on wildlife are provided in the Conclusion.

Chapter 2: Proposed Forestwide Desired Conditions

2. Terrestrial Ecosystems

2.1 Terrestrial Vegetation

2.1.1. All Terrestrial Ecosystems

Desired Condition (DC) 04 seems to manage for minimums when using the term “adequate”. If this is a desired condition then the statement would be better served if the term “robust” were substituted, thus reading: “The pattern of vegetation across the landscape provides for **robust** habitat connectivity, dispersal, and genetic interchange for native plant and animal species.”

Desired Condition 04 goes on to state, “Patterns support potential range shifts of plant and animal species that may occur in response to climate change.” It is important to note that vegetation “patterns” are also defined by land management which often is not in the best interest of connectivity, dispersal and genetic interchange. A statement to the effect that land management will be tailored to enhance these conditions where possible, would be appropriate.

It is understood that DC 05 may preclude DC 04. Every effort should be taken to avoid such future developmental impacts.

2.1.2 Forested Ecosystems

Baseline maps (2015) of current conditions, including existing tree species distribution and cover type proportions must be maintained and available to the public over the life of the Forest Plan.

DC 01

- It would be wonderful if “desired conditions have the capacity to maintain or regain normal functioning following disturbances, and in the face of changing climate.” However, there are no assurances that chosen desired conditions will be able to regain normal function in the face of a changing climate. Such statements promise the public a result that with no degree of certainty can be achieved, particularly when the HLCNF Assessment points out that the HLCNF is the only Forest in the Northern Region that is not trending in a positive direction in storing carbon, i.e. the HLCNF is losing carbon.
- It is easy to “decrease” a species of tree, but can be impossible to “increase” its presence. The stated desired condition could seriously destabilize the ecosystem because all the “decreases” in forest species could be achieved (highly marketable Douglas-fir, for example), while increasing others may be next to impossible – whitebark pine for example. This document clearly states (pg 7) “Plan components are developed that together provide for ecological sustainability ...” yet the desired conditions define what is likely to be an unachievable result. This could become an institutionalized Forest Plan disaster – destabilizing ecosystems.
- What does “as appropriate” mean in the following sentence (pg 8) “Post-disturbance conditions include effective recovery and re-establishment of vegetation as appropriate.” Does this mean at the discretion of the land manager?

Table 1 – percentages add up to 182%. Why?

Table 2 – percentages add up to 88%. Why?

- does not reflect Limber Pine.
- How will lynx benefit from the Desired Future condition reductions in their primary habitat: Spruce-fir forested cover type

For each of the Tables: 1 – 12, the actual acreage, and in some cases the relative percentage, of current estimate that presently constitute the HLCNF for each of the following parameters are not provided but should be to establish trend data.

- Forested area
- Tree Species
- Forest Cover Type
- Vegetation Groups
- Forest size classes and successional stages
- Forest density classes
- Forest size classes
- Old Growth

Provide the “potential” acreage for each of the above categories as well.

Table 3 - percentages in this table do not make sense – substantially over-shooting 100%

- Warm-Dry Vegetation Group adds up to 151% with Douglas-fir (73%) and Lodgepole pine (26%) supposedly constituting 99% of this group.
- Cool-Moist Vegetation Group adds up to 210% with Douglas-fir (42%), Lodgepole pine (53%), Englemann spruce (47%), and Subalpine fir (51%) constituting 193% of this group.
- Cold Vegetation Group adds up to 214% with those species that would be decreased – Subalpine fir (60%) and Englemann spruce (36%) – constituting 96%.
- This table appears to over-emphasize harvest of certain tree species in each vegetation group. For a planning document, these tables are either inaccurate or misleading.

Table 4 – percentages in this table do not add up to 100%

- Warm-Dry Vegetation Group only adds up to 90%
- Cool-Moist group only adds up to 91%
- Cold group only adds up to 90%
- In the Warm-Dry Cover Type, we would like to see the spruce/fir cover type managed at its upper range which is only 0-1%, not below this, which is called for.
- At the elevations where whitebark pine occurs, the plan seems to be removal of all other tree species: “The whitebark pine cover type is present on colder sites after stand replacing disturbance and is maintained/increased.” It seems to us that the only stand replacing disturbance that should occur in these types of areas would be fire – not timber harvest as is implied in the Cool-Moist and Cold vegetation group.

Desired Condition (DC) 02

- Table 5
 - Percentages do not equal 100.
 - Footnote “a” is particularly worrisome because there is no provision to retain any particular size of tree in a give “forest size class”, so clear cutting (or facsimilies such as shelterwood or seed tree harvest) would remove even

desirable sized trees. Where is the finesse that *can* be employed during harvest?
Footnote “a” as defined:

- “The *predominant* diameter class of live trees, calculated as basal area weighted average diameter. A stand in a forest size class may contain trees of multiple diameters.”

- Table 6 Given what should be an emphasis on carbon sequestration, we wonder why forest cover should be reduced and wish to see the science that supports this direction. Especially given the emphasis on increasing Nonforest classes.
- Table 7
 - Percentages within each Vegetation Group do not add up to 100%: Warm-Dry 89%, Cool-Moist 93%, Cold 90%.
- Table 8
 - Percentages within each Potential Vegetation Group almost add up to 100%:
 - Acreages for these potential Vegetation Groups should be displayed.

DC 04

- Acreages and percentages of existing vegetation types are not provided to compare to desired potential vegetation types. (Potential: Warm-Dry 42%, Cool-Moist 33%, Cold 21%)

DC 05

- Table 9 This table does not provide current acreages of old growth for each group but should. It also does not identify the Desired Condition (only the Current Estimate is given) in terms of percentage or acreage for each group as the title suggests.
- The table seems to suggest that old growth should be decreased in the Cool Moist Vegetation Group. If so, we do not agree. The rationale states: “...the natural proportion of old growth should be lower in this type than in warm dry settings.” While Cool Moist areas may constitute less acreage, proportionally, old growth should not be “lower in this type than in warm dry settings.” Such direction is counter-intuitive for cool-moist settings, for wildlife habitat diversity, and for carbon sequestration.

DC 07

- Table 11. We encourage and support the desired future condition to increase downed woody material (>3” diameter) within each potential vegetation group. However, natural processes, rather than creating slash, is the vastly preferred method to get large material on the ground while creating complex natural openings in older forests.

DC 08.

- We support the desired future condition to increase the large and very large tree component, but wonder how reduction of medium size trees will affect this direction in time.

DC 09

- We support direction that recognizes natural ecological processes and disturbances in wilderness, recommended wilderness and backcountry areas, but we strongly encourage recognition of Inventoried Roadless Areas and allowing natural ecological processes to unfold in those areas as well.

DC 10

- With climate change, there is no assurance that insect and disease occurrence will be within what humans consider to be the natural range of variability (NRV). It is our position that nature will best define ecological processes across the landscape and that human attempts to change that direction can have serious long-term ecological consequences. Allow the landscape heal itself from insect and disease issues.

DC 11

- Designated Tree Improvement Areas need defining, quantification, mapping, and discussion within the context of climate change, watersheds, fish and wildlife habitat.

2.1.4 Fire

- Add this proposed Desired Condition:
 - Annually, educational materials including public service announcements, print media, electronic postings, occur to inform the public about the role of fire in the ecosystem and what the public can do to ensure that their property is properly maintained to resist fire.
- Fire adapted communities are encouraged and supported by USFS expenditures in the Wildland Urban Interface.
- Recognition that forests more than 4 mile(s) from WUI will be allowed to function as per Item 06: "Wildland fire is accepted as a necessary process integral to the sustainability of the forest's fire-adapted ecosystems."
- WUI definition as per the 2005 Tri-County Fire Group:
 - " We defined our wildland urban interface (WUI) boundary as the area within four miles from communities that possess a population density exceeding 250 people per square mile. Projects proposed in the WUI would become a priority for accomplishment."
- HHAA supports this direction provided by the Tri-County Fire Group

2.1.5 Rangelands and Nonforested Ecosystems

- Maintain or expand all sagebrush, mountain mahogany, and most juniper communities as well as other shrub forage for mule deer.

2.1.6 Noxious Weeds

- Add desired condition: “Activities that create conditions that increase potential for weed expansion across the HLCNF will not be employed by land managers.”

2.2 Terrestrial Wildlife

- This section is woefully inadequate. The document states: “Wildlife habitats depend on terrestrial vegetation, so it follows that the desired conditions for terrestrial vegetation are, for the most part, also desired conditions for wildlife habitats.” HHAA cannot accept this approach. We have commented in some detail on the Terrestrial Ecosystems and Vegetation that will affect wildlife, however the analysis approach for wildlife must not be a condition tangential to vegetation, it must be direct.
- Where are the Desired Conditions for big game? Specifically:
 - summer range (habitat effectiveness and hiding cover),
 - fall range (security in the form of necessary vegetative cover),
 - winter range (snow intercept, snow crusting abatement, thermal needs, disturbance factors),
 - spring range (calving /fawning and nursery),
 - retention of big game on public lands
- Where are the Desired Conditions for species-specific connectivity needs?
- Where are the Desired Conditions describing how wildlife will be able to move through the landscape to and from seasonal ranges?
- Where are the Desired Conditions that provide for the habitat of species dependent upon old growth and whether connectivity exists between patches of such habitat?
- Where are the Desired Conditions for snag dependent species?
- Where are the Desired Conditions for species that depend on Mature Forests which are targeted for reduction in this plan?
- Where are the Desired Conditions for large-tract intact forest that are necessary for a host of species whose life-cycle is denigrated by fragmented forests?
- This section of the Draft Desired Conditions for the HLCNF is unacceptable and must not be cast off by relegation to a “fine-filter” discussion that isn’t described.

- The HLCNF’s wildlife, in all their diversity, and importance to the people of Montana, deserve more in this analysis.

2.2.4 Other Wildlife Species

- DC 01: Modify to acknowledge 2015 as the current baseline for hunting opportunity. The way in which this condition is currently stated will not ensure the traditional 5 week rifle hunting season.
- DC 02: Modify to also identify forest removal as a potential disturbance as well as motorized travel. Suggested revision: “Management of potential disturbances (e.g. motorized travel, forest removal) in big game habitat considers seasonal security, hiding cover, and habitat needs for all hunted species occurring in that area.”

3. Watershed, Aquatic, Soil, and Air

3.1 Watersheds and Water Quality

- More than 65% of watersheds are rated as functioning at risk (53%) or rated as impaired (12%), however the majority of those watersheds are on the Helena portion of the HLCNF. A map of impaired watersheds should be displayed.
- Add desired condition in conjunction with DC 05 (addressing fire risk) that recognizes the importance of maintaining native ground cover and reducing openings conducive to increased runoff/sedimentation.

4 Benefits to people: multiple uses and ecosystem services

- Reorder this title to cite ecosystem services first, since without their proper function, multiple uses are moot

4.4 Livestock Grazing

- Add desired condition: “Bring the cost of grazing allotments in-line with private value.”
- Consider how public land livestock grazing affects ecosystem services.
- Consider how public land livestock grazing shifts wildlife onto private lands causing
 - depredations due to inadequate public land forage,
 - population declines due to starvation when wildlife are forced back onto public lands having inadequate forage with the implementation of 6-month-long shoulder seasons
 - cost to the State to set up and administer game damage hunts

4.5 Timber

- Where is the discussion regarding ecosystem services that intact forests provide?

4.8 Fish and Wildlife

- Add to DC 01 the following: “But under no circumstances should habitat be degraded to reduce populations.”

4.15 Carbon storage and sequestration

The inclusion of climate change considerations is indeed appropriate. The plan needs to address carbon production in the context of management choices selected, such as the carbon footprint of mechanized forestry and motorized recreation options.

- As a National *Forest*, the HLCNF has an important role to play in slowing, or at least not accelerating Climate Change and its far-flung consequences. In that effort, carbon sequestration in growing forests and carbon retention in old forests as well as dead and downed material (often called “woody debris” although this description fails to impart the significance of dead wood) that locks up carbon. A more serious discussion of this ecosystem service, and its collective impact when considering all forests within the national forest system is necessary in the forthcoming Forest Plan.
- The 2015 HLCNF Assessment (pg 5) states:
 - “Forests generally act as carbon sinks because growing plants remove carbon dioxide and store it, causing these areas to absorb more carbon than they emit (USDA Forest Service 2015, Heath et al. 2011). In the U.S. in 2003, carbon removed from the atmosphere by forest growth or stored in harvested wood products offset 12-19% of U.S. fossil fuel emissions (Ryan et al. 2010). Forests in National Forest System lands feature greater carbon density, on average 28% more per forested hectare, than that of private land (Heath et al. 2011). In the U.S., land use conversions from forest to other uses (e.g. development or agriculture) are the primary human activities exerting negative pressure on the carbon sink (Ryan et al. 2010; Conant et al. 2007).”
- Carbon stocks on the HLC NFs decreased slightly while all other forests in the Northern Region increased. If forests are to fulfill their potential in storing carbon, management measures need to be taken to do so.
- The single stated Desired Condition for this issue does not provide clarity on how the HLCNF will meet this responsibility: “Carbon storage and sequestration potential is sustained through maintenance or enhancement of ecosystem biodiversity and function, and managing for resilient forests adapted to natural disturbance processes and changing climates.”
- The Assessment goes on to state:
 - “Carbon density increased slightly for the Northern Region from 1990 to 2013, but the densities on the Helena and Lewis and Clark National Forests decreased, as shown in Figure 4.5. Factors such as disturbances along with changes in land use, timber harvest, and site quality may be responsible for these trends (USDA Forest Service 2015).”
- Certain wildlife species, according to the Assessment, will particularly suffer:
Wildlife

The wildlife species identified as potentially vulnerable to climate change on the HLC NFs include American pika, Canada lynx, flammulated owl, greater sage-grouse, pygmy nuthatch, and wolverine. Vulnerabilities are also identified specifically related to changes in snow cover/depth/condition. The potential influences of climate change on these species are summarized as follows (NRAP 2014b):

- In areas where warmer, dryer conditions cross critical thresholds, pikas are likely to experience local extirpations, and recolonization in many cases is unlikely.
 - Loss of snow may shift the balance from lynx to other snow-adapted predators and may be destructive to snowshoe hare populations.
 - Flammulated owls may be affected relative to the extent that large diameter dry forests are affected by climate change; increased disturbances that cause shifts to young forest may be detrimental.
 - The effects of climate change to sage grouse are not straightforward, although it is strongly tied to the condition of sagebrush habitats. Climate caused changes to this species will interact with notable anthropogenic stressors in ways that are complex and hard to predict.
 - Pygmy nuthatches prefer dry forests, and may expand into higher elevation areas with warmer temperatures. However, disturbances that cause shifts to young forests or shifts from forests to grass/shrublands may be detrimental.
 - Trends to wolverine are strongly tied to the expected changes and losses to snowpack and snowy habitats.
- HHAA posits that less timber harvest and burning on the HLCNF in the future could help reverse this trend thus meet at least one of the stated strategies to: “Recognize carbon sequestration as one of many ecosystem services”

4.16 Partnerships and Coordination

- It appears as though the voice of individuals and non-collaborators will be excluded or drastically minimized through this process.
- Where are the voices invited to participate that challenge and test the status quo,?
- HHAA repeatedly asked for a seat in a Collaborative group regarding the Tenmile-South Helena Project but was rejected. Why, therefore, should we, or anyone else who is not part of a collaborative, accept this Desired Condition?
- Given the way Terrestrial Wildlife was addressed in this document it appears as though the intent is to distance hunters and wildlife advocates from this process, through collaboration.

5. Recreation Settings, Opportunities, Access, and Scenery

We could find no discussion of or Desired Conditions regarding use of drones or other unmanned aircraft that would certainly affect a host of national forest components or uses such as wildlife, user experience, livestock harassment.

5.3 Developed Recreation

- DC 04 Modify this to say: “Developed recreation facilities are managed to ensure that environmental impacts do not interfere with functional ecosystem services.”

5.4 Dispersed Recreation

- “Dispersed recreation activities are managed according to fiscal capability.” This statement puts the horse behind the cart in that if there is not adequate funds to manage dispersed recreation, then such management simply does not happen. Responsible management would allow dispersed recreation within the bounds of financial capability.

5.5 Recreation Access

- DC 03 appears to sanction degradation of the environment particularly when budgets are lacking: “***Within budgetary constraints***, Forest system roads and trails provide a variety of high-quality motorized and nonmotorized recreational access to the Forests, during both summer and winter months. The road and trail systems provide recreation access to destination locations and loop opportunities within the Forests.” So, what happens to roads/trails when financial resources are not available to maintain and manage them?
- Desired condition statements need to be more than pie-in-the-sky. How is it determined whether recreation access is “*compatible* with other natural resources”? And what happens if it is not?

8. Infrastructure

- These Desired Conditions are well stated.

Chapter 3: Geographic Areas

While HHAA values all areas of the HLCNF, we offer comment/suggestions for those that we are most familiar, including Big Belts, Divide, Elkhorns, and Upper Blackfoot. However in the Island Mountain Ranges we encourage wilderness recommendation for Big Snowies Wilderness Study Area, Middle Fork of the Judith Wilderness Study Area, North Crazy Mountains – in fact all WSAs and IRAs, because these wild, native areas constitute a minor portion of public lands, they can never be recreated, and therefore should be retained for future generations.

BIG BELTS

We tend to agree with the stated desired conditions, although for Terrestrial Vegetation, we stress the need to retain important forested areas, particularly mature and old growth forests with an earlier aged component retained for recruitment into mature and old growth. While management direction might favor “enhance[ment of] sagebrush, grassland, and aspen communities”, that direction should not oppose important carbon sequestering habitats involving mature and old growth forests, nor should it reduce threatened lynx habitat. (pg 55)

The Edith-Baldy and Camas Creek Roadless Areas and additions to Gates of the Mountains should ultimately be managed as Wilderness but in the interim be retained as roadless to provide critical wildlife habitat (mountain goat, wolverine, wildlife connectivity), roadless hunting opportunities, and necessary ecosystem services.

The importance of North American raptor flyway that runs the length of the Big Belts needs to be identified in a Desired Condition to elevate its importance and assure perpetual, unhindered use by raptors.

DIVIDE

To our surprise, there are no Terrestrial Vegetation Desired Conditions listed for Divide as there are for most other Geographic Areas. The Divide geographic area is a crucial landscape linkage for grizzly bears, lynx, wolverine, among many other species, yet is the most narrow and fragmented of all HLCNF geographic areas, making it much more susceptible to impacts from private property management that borders this unit which has a greater ratio of “edge” with private property compared to its land mass than any other Geographic Area. For this reason, Desired Condition for Terrestrial Vegetation should include provisions for forested cover provided through mature and old growth forests, and factor in provisions to meet Desired Conditions for Terrestrial Wildlife that acknowledge important North-South connectivity for wildlife including lynx, wolverine, and grizzly bears – all species that require forest cover. It is not enough to simply say that Divide “continues to provide habitat connectivity for wide-ranging species...” without assuring that it will be able to continue to do so. (pg 59)

To this end, critical Inventories Roadless Areas and other unroaded parcels that contribute necessary habitat to provide linkage and connectivity for wildlife should be identified in Desired Conditions.

On the Helena portion of the HLCNF, from north to south these areas include Scapegoat Wilderness Additions, Anaconda Hill, Flesher-Stemple, Nevada Mountain IRA, Sweeney Creek, MacPass North, Jericho Mountain IRA, Black Mountain-Lazyman (proposed Wilderness), Little Blackfoot Meadows-Electric Peak IRA. Again a variety of needs would be met with retention of these areas in roadless status.

Within the Divide GA, five of these important linkage areas occur including Nevada Mountain IRA, Sweeney Creek, MacPass North, Jericho Mountain IRA, Black Mountain-Lazyman IRA. These link to the Blackfoot Meadows/Electric Peak IRA to the south and the Stemple-Flesher area to the north.

Given damaged watersheds (worst in the National Forest System, and the source of water for the Capitol City), the Upper Tenmile Creek Mining Super Fund Area where millions of tons of toxic waste are being deposited at the very head of the watershed in the Luttrell pit (in a seismically active area), a spaghetti-network of eroding roads, massive movement of toxic soils, and hundreds of leaking mine adits, we cannot agree with the following statement on page 58:

“While the GA has a rich history of prehistoric occupation, *it’s signature on the landscape is not obvious.*” If any Geographic Area demands watershed restoration – which is obvious – it is Divide. And such restoration, we believe, would involve only judicious forest removal.

Recognition should be given to Divide, that it provides an important hub of wolverine movement within the state according to MFWP.

Divide should not only be listed under Terrestrial Wildlife, but under Unique Characteristics as well because it is the most dissected, fragile yet critical linkage for wide-ranging wildlife along the Continental Divide – providing a crucial link between the Northern Continental Divide Ecosystem and the Yellowstone Ecosystem. All parcels capable of providing wildlife linkage, and there area 5 of them, should be retained.

Item 04 (pg 59) regarding the Spotted Dog Wildlife Management Area is appreciated in that “Elk habitat on NFS lands adjacent to the Spotted Dog WMA is managed to provide for elk occupancy throughout most of the year.”

Are “habitat characteristics and conditions” being “maintained that provide for use by...” grizzly bears, lynx, and fisher? If not, why not, since a similar provision for terrestrial wildlife is offered in the Upper Blackfoot GA?

Why is there not a provision for the Little Blackfoot similar to Item 10 (pg 75) for the Upper Blackfoot GA that states, “Recovery and delisting of bull trout is the long-term desired condition.”

ELKHORNS

On page 61 it states that “...MTFWP has made the Elkhorns a permit-only bull elk hunting area.” That is not correct. Spike bulls may be hunted with a general elk license.

And use of the terminology “...in the *nation* encompassing portions of both the Helena and the Beaverhead-Deerlodge National Forests” seems a little odd. (pg 61)

Item 05 (pg 62) calls for habitat conditions to re-establish bighorn sheep. What about re-establishing mountain goats which occurred in the Elkhorns much longer than did bighorns?

HHA fully supports designation and full implementation of the Elkhorn Wildlife Management Unit, the only one of its kind in the National Forest system.

UPPER BLACKFOOT

Critical Inventories Roadless Areas and other unroaded parcels that contribute necessary habitat to provide linkage and connectivity for wildlife should be identified in Desired

Conditions. These include Nevada Mountain, Crater Mountain (Flesher-Stemple), Specimen Creek, Anaconda Hill, Green Mountain, Alice Creek, Stonewall.

Item 06 (pg 74) is either seriously misinformed or appears to be a mistake in that it credits *roads* for "...sustaining grizzly bear population in the NCDE and providing the opportunity for movement of bears to the Greater Yellowstone Ecosystem." We do not agree that roads are necessary for grizzly bears to move. In fact, quite the contrary.

Item 08 (pg 74) "The potential for connectivity of wildlife habitats and population is maintained across MT Highway 200." How specifically is this being accomplished?

Conclusion

If publicly acceptable Desired Conditions are to be achieved, *clear, measurable standards are essential.*

Desired Conditions for Vegetation

Certain Desired Conditions for Vegetation that the HHAA would like to see for the HLCNF are not displayed in this document. Although pine beetles have taken a toll on the HLCNF, their action has now largely come to an end and management should be taken to encourage forest recovery. Native forests not only reduce carbon in the atmosphere and thus buffer climate change, but forests sustain streams and entire watersheds, filter sedimentation, encourage moist microhabitats, provide wild animals (from wood frogs to wolverines) cover from heat, cold, wind. Forest canopy is essential in guarding against deadly winter snow crusting that occurs where sun glazes open snow fields into landscapes of glass, shredding legs of pawing big game and preventing access to buried forage – as it is doing this winter of 2016.

Forests provide natural resistance to noxious weeds, helping to shade out weeds from otherwise preferred open area. Forests filter sediment from runoff producing clear shaded stream pools for cutthroat and bull trout.

Forests provide homes for forest-dwelling species that are becoming ever more rare (pileated woodpeckers, goshawks, hermit thrushes, fisher, martin, among others). Forests provide essential security cover in autumn for big game animals, and essential hiding cover for summering animals.

Forests provide mystery, solace, and quiet places for people, not only in wilderness and distant locations (4.13) but also at the local Forest level. Forests buffer noise, heat, and gently release snow packs – allowing for streams and rivers to run stronger for longer periods over the years. Fish benefit, anglers benefit, municipal watersheds benefit, ground water is reliably recharged. The climate will benefit.

We think a primary focus of the HLCNF should be to restore complex, natural forests. Desired Conditions addressing the above issues should be incorporated into the Plan.

Desired Conditions for Wildlife

The wildlife section must be developed since it was entirely lacking in the Desired Condition document.

We have reviewed the Assessment regarding big game and as we have submitted in numerous recent documents (Big Game Security Amendment for both the Divide and Blackfoot areas), we cannot accept its conclusions relative to the [non]value of vegetative cover to big game security and hiding cover needs. Vegetation cover is not necessary for big game security according to the Assessment. Scientific literature does not support that approach.

Contrary to direction given in the Desired Condition document for the public to discern whether wildlife needs will be met by reading the Terrestrial Vegetation Desired Conditions, we request that the HLCNF tailor Desired Conditions for wildlife and their habitat needs. In addition to the discussion and list of Desired Conditions we would like to see for Wildlife that were listed under 2.2 above, we offer the following.

At a *minimum, additional* Desired Conditions for Wildlife would involve:

- Desired Conditions for big game security that represents the seasonal habitat needs of all big game species; this may require specific Conditions for each species.
- Recognize that the terms ‘big game’ and ‘elk’ are not necessarily interchangeable.
- Desired Condition: hiding cover is a crucial component of big game security.
- Desired Condition: Retain big game hiding cover through various components of Terrestrial Vegetation, as a functional and measurable component of the landscape.
- Desired Condition: frequent dense cover areas will be maintained adjacent to roads.
- Recognize that bull elk vulnerability on public lands is an important measure in defining elk security on public lands.
- Desired Condition: hiding cover on the Forest will be adequate to retain big game on the HLCNF Forest during the entire hunting season, 9/1 – 12/1.
- Desired Condition: elk security is adequate to assure that no more than 40% of bull elk harvest occurs by the end of the first week of the general rifle season

- Develop a Forest Plan standard that recognizes forest cover as an important component of big game security and requires retention of existing cover and steady restoration of hiding cover where biological potential allows.
- Desired Condition: large unroaded areas are providing forested cover for elk security,
- Desired Condition: vegetative cover types are classified as to whether they are capable of providing elk hiding cover at a 40% canopy closure. This metric must be clearly described.
- A combination of principles regarding security from Hillis et al.ⁱ, along with an evaluation of existing and potential forest cover as per Jellisonⁱⁱ should be explored to design and implement revised Forest Plan Standard that reflects security for bull elk on public lands.
- Do not use elk population numbers as proxy for deer and moose population health.
- Desired Condition: current and potential habitat for deer and moose are described.
- Desired Condition: habitat cover needs of deer and moose as well as elk are described.
- Desired Condition: the HLC National Forest's various landscapes' abilities to meet their respective biological potential to produce vegetation capable of providing hiding cover are described.
- Desired Condition: a percentage greater than the minimum of each landscape's biological potential to produce hiding cover will be applied to the landscape for the benefit of big game in conjunction with a prudently monitored and responsively managed transportation system.
- Desired Condition: Montana's wildlife species occur across Montana National Forests, therefore their habitats across the full landscape of those forests are recognized.
- Desired Condition: habitat improvements for moose are leading to stronger moose populations. Particularly where motorized uses bring people into contact with moose, screening habitat is essential.
- Desired Condition: mule deer and white-tailed deer seasonal needs for snow intercept are being met to combat energy demands and forage availability needs during winter.
- Desired Condition: motorized access impacts that bring people into contact with mule deer are being reduced through vegetation screening, particularly along roads.

- Desired Condition: diverse, abundant shrub forage species are being emphasized in suitable vegetation cover types for mule deer and moose.
- Desired Condition: screening vegetation along motorized roads/trails, as well as motorized road/trail density standards are benefiting deer and moose that otherwise are extremely vulnerable to criminal behavior outside of the hunting season, and to easy harvest during the hunting season.
- Desired Condition: a minimum vegetation buffer of 90 m to serve as screening cover along roadsides to improve survival of grizzly bearsⁱⁱⁱ is established (research from west-central Alberta,)

Desired Conditions for Watersheds

Motorized recreation and timber harvest have and are seriously impacting watersheds and need to be scaled back.

Desired Conditions for Recreational Opportunities

Retain as much undeveloped/unroaded landscape as possible for future choice. Once developed and/or roaded, reversal of those actions and restoration of natural processes is extremely difficult. There should be options for the future.

Desired Conditions for Social Benefit

Although not technically a “commodity”, one of the rarest of “experiences” that society seeks in this day and age is peace, solace, the chance for quiet reflection – opportunities to experience the rejuvenating power of nature. The value of the natural experience cannot be accurately measured, but we believe that natural landscapes, in their native form, far outweigh other “commodity” values. And, very importantly, future options are retained.

We believe the HLCNF has an obligation to educate the public about the ecosystem services that forests provide, and avoid engendering public pyro-panic that results in fear of forests. The latter has clearly been driving many if not most of the recent projects on the Helena National Forest.

We reiterate that if publicly acceptable desired conditions are to be achieved, *clear, measurable standards are essential.*

We are anxious to see the next version of Desired Conditions for the HLCNF, and appreciate this opportunity to provide what we believe are important Desired Conditions that will help guide future management of the Helena Lewis and Clark National Forest.

Sincerely,



Stan Frasier, President

ⁱ **Hillis, J.M., M.J. Thompson, J.E. Canfield, L.J. Lyon, C.L. Marcum, P.M. Dolan, D.W. Cleery.** 1991. Defining elk security: The Hillis Paradigm. *in* Elk Vulnerability - A Symposium. Montana State Univ., Bozeman, April 10-12, 1991.

ⁱⁱ **Jellison, B.A.** 1998. Rocky Mountain Elk vulnerability within the Bighorn National Forest. Rocky Mountain Elk Foundation (WY96107), Bow Hunters of Wyoming and Wyoming Game and Fish Department. *In* A ROCKY MOUNTAIN ELK HABITAT CONSERVATION PLAN FOR THE WGFD SHERIDAN REGION (And Portions of the Cody Region) Wyoming Game and Fish Department Sheridan Region Updated May 2004. 62pp.

ⁱⁱⁱ **Kite, R., G. Nelson, T. Stenhouse, and C. Derimont.** A movement-driven approach to quantifying grizzly bear (*Ursus arctos*) near-road movement patterns in west-central Alberta, Canada. *Biological Conservation*, Vol. 195, March 2016. pp 24-32