LAZYMAN-BLACK MTN INVENTORIED ROADLESS AREA ASSESSMENT

Helena-Lewis and Clark National Forest Inventoried Roadless Area Monitoring Project

Helena Hunters and Anglers Association

May 25, 2026

LAZYMAN-BLACK MTN IRA

(looking east from MacDonald Pass)

Lazyman parks mid-left, Black Mountain center-left, Colorado Mountain center
Jericho Mountain IRA in foreground
Red Mountain – south of Lazyman IRA, center-right with snow
Elkhorn Mountains – far ridge on skyline

Report prepared by Helena Hunters and Anglers Association members
Gayle Joslin, Doug Powell, Gary Ingman, Dennis Milburn, Camie Westfall, Steve Platt, and Paul Ferry

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ACRONYMS

HLCNF	Helena-Lewis and Clark National Forest
HHAA	Helena Hunters and Anglers Association
HRD	Helena Ranger District
IRA	Inventoried Roadless Area
MFWP	Montana Fish, Wildlife and Parks
TSH	Tenmile-South Helena (Vegetation Manipulation Project)
BLM	Bureau of Land Management

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Upper Colorado Gulch in the heart of the Lazyman Gulch Inventoried Roadless Area.

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ABSTRACT

Helena Hunters and Anglers Association (HHAA) implemented a monitoring program in 2022 designed to assess the status and trends in condition of Inventoried Roadless Areas (IRAs) on the Helena-Lewis and Clark National Forest (HLCNF). Monitoring focus was on boundary condition, hydrology, wildlife, vegetation, human use and violations, and other observations.

In response to the Tenmile-South Helena Forest Manipulation Project (initiated 2014), from 2014 through 2020, field surveys for the Lazyman-Black Mountain IRA (as it is sometimes referenced) were collected for 39 locations. This effort was part of HHAA's legal defense of the Lazyman IRA's roadless character wherein it was documented that "roads" that were intended to be used for "manipulation" were aspirational rather than actual. Four additional surveys were added in 2022-2024 to cover areas not previously surveyed. Five aerial surveys were conducted, and ten "Incidents" were quantified, totaling 58 reports.

Aerial overflights documented user created motorized routes, heavy equipment incursions, illegal OHV forays, big game winter range usage, occasional wildlife observations, and occurrence of forest management activities.

Field surveys revealed: the status of aspirational "roads" that were intended for use during the Tenmile-South Helena Vegetation Manipulation, signage needs at access points, several miles of illegally constructed trails being used by e-bikers, an illegal outfitter camp, creek disturbance by placer miners, occurrence of noxious weeds, trapping activity that involved capture of a domestic dog, private landowner usage of public lands for property storage, and travel plan enforcement needs in several areas.

The importance of the Lazyman-Black Mountain IRA as a snowpack area producing water for the City of Helena municipal water supply and for beneficial water uses in Tenmile and Prickly Pear creeks is discussed.

Wildlife habitat status is classified as "Good," although threats are discussed. Many native wildlife species have been documented within the Lazyman IRA or in the immediate vicinity by members of HHAA, indicating relatively high biodiversity.

Most of the forest is in mid- to late-seral stage. Forest conditions are discussed and a trend toward early-seral stage is occurring in many areas. Wildfire, an important natural ecological process, has been largely excluded from the IRA for at least the past 80 years. This lack of the natural fire regime has had some impacts on the area in forest composition for structure, age and species.

Readily available public access from all sides of the IRA provide recreational opportunities throughout the area. A "leave no trace" ethic needs to be stressed. Mechanized/bicycle use was apparent within

portions of the Lazyman IRA. Illegal trail/travel route clearing work was documented in several locations. This is a growing trend warranting a proactive response from the agencies.

HHAA recommends that agency monitoring be amplified for Travel Plan enforcement, illegal grazing, noxious weed control, and enforcement against other illegal activities. Permanent signs stating use restrictions are needed at entry points into the IRA.

As a result of HHAA monitoring and coordination with the Helena-Lewis and Clark National Forest personnel, a gate was installed, efforts to remove an illegal camp were initiated, adjacent landowners were made aware of public land use regulations, illegally constructed trails received signage, and private equipment was removed. Importantly, in 2020, HHAA prevailed in its legal efforts to prevent heavy equipment usage by the Forest Service to "manipulate vegetation" within the Inventoried Roadless Area.

This report was prepared by Helena Hunters and Anglers Association members Gayle Joslin, Doug Powell, Gary Ingman, Dennis Milburn, Camie Westfall, Paul Ferry, and Steve Platt.

BACKGROUND AND INTRODUCTION

Helena Hunters and Anglers Association (HHAA) is a small but dedicated group of volunteers who care deeply about Montana's wildlife, wild places and public lands. Our conservation focus emphasizes local public land roadless areas, big game security, travel management, local Fish, Wildlife and Parks Wildlife Management Areas, and ethical hunting and fishing.

We, as twenty-first century Montanans, have inherited an incredible legacy of publicly owned lands and waters that support a diverse array of wildlife and fish, belonging to us all. Our American system of public lands and North American Model of Wildlife Conservation are unique in the world. As hunter-conservationists, we feel a profound responsibility to protect what we have inherited and to improve on it where possible. Unfortunately, there have always been, and always will be, those who seek to destroy this legacy for profit. We believe in constant vigilance and holding public land and wildlife managers to account, encouraging them towards even better stewardship and conservation-minded management.

Few agencies have more history or meaning to us than the Forest Service with its colorful and courageous genesis out of the corporate exploitive era of the late 1890s and early 1900s. The Helena National Forest was one of Theodore Roosevelt's 'Midnight Forests' – one of 21 National Forests that he and his staff created out of western public lands in March, 1907. Roosevelt himself proclaimed that these wild places would be reserved 'for those yet unborn in the womb of time.' We at HHAA are those unborn souls he was referring to, and we are compelled to be involved in the future of our public lands.

HHAA members have a very long history of advocating for protective management of the numerous Inventoried Roadless Areas (IRAs) included within the 2,883,227 acre Helena-Lewis and Clark National Forest. In fact, more than one-half of the Forest (nearly 1.5 million acres) consists of designated IRAs (Figure 1.) These IRAs represent some of the best remaining habitat for sensitive and endangered species including grizzly bear, lynx, wolverine, gray wolf, and bull trout. They also represent the most intact remaining big game security areas that help to sustain elk and deer populations in the face of increasing hunting pressure. Collectively, the IRAs represent stepping stones across the landscape that help maintain linkage corridors between increasingly isolated wildlife populations. They allow for the transfer of genetic material between sub-populations of wildlife. And here, along the Continental Divide – the major movement corridor on the Continent for large carnivores – these IRAs could not be more important.

The major factor contributing to wildlife habitat fragmentation and thus population isolation are roads. A synthesis of scientific information regarding forest roads (Gucinski, et al., 2001, https://research.fs.usda.gov/treesearch/7769) acknowledges that hydrologic basins with the highest ecological integrity index were largely unroaded; that road densities and fish populations correlate negatively; and that roads can increase harassment, poaching, collision with vehicles and displacement of terrestrial wildlife. The report details both negative and positive (economic) value of roads, but

recognizes that roads foreclose options for wilderness designation, nonmotorized recreation, and various types of wildlife refugia.

The Conservation Value of National Forest Roadless Lands reported on by McKinley et al. in 2020 (https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.288), details the ecological effects of roads; iterates the beneficial aspects of roadless country including biodiversity, hydrology, and total carbon capture by protected areas; and describes the perils of development-driven attrition of roadless lands throughout the United States.

With respect to wildlife, habitat fragmentation has been shown to have numerous impacts, including conversion of "interior habitats" into "edge habitats," changes in predation, and productivity rates. The Montana Chapter of The Wildlife Society compendium, *Effects of Recreation on Rocky Mountain Wildlife* (1999) (https://helenahuntersandanglers.org/wp-content/uploads/2020/12/Effects-of-Recreation-on-Rocky-Mountain-Wildlife-Joslin-Youmans.pdf#:~:text=Joslin%2C%20G.%2C%20and%20H.%20Youmans%2C,Chapter%20of%20The%20Wildlife%20Society) stresses the importance of undisturbed, natural landscapes in providing the life-cycle needs of specialist species as well as those that are less tolerated by humanity, such as carnivores and concentrations of wild ungulates. For certain species, *"Habitat fragmentation and degradation resulting from human development and disturbance are the most serious long-term threat[s]." Effects of Recreation on Rocky Mountain Wildlife* provides management recommendations and guidelines for a variety of taxonomic groups of wildlife revealing that roadless country is important for all, and essential for certain species in the face of recreational pressures.

Other values associated with IRAs include high elevation snowpack areas that sustain streamflow for downstream fisheries, irrigation, municipal and industrial water supplies, and hydropower production. They also provide high quality dispersed human recreational opportunities such as hiking, hunting, foraging, wildlife viewing, and solitude. Ecological integrity and biodiversity associated with the IRAs provide a scientific baseline against which we can compare the long-term effects of adjacent development activities and influences of climate change, forest succession, insect infestations, and other variables in a natural setting. HHAA has continued to defend these areas against repeated development proposals and has promoted their importance on a local level, and at a larger ecological scale.

We have recently developed a monitoring program utilizing HHAA members and volunteers to gauge the status and trends in condition of the Helena Forest's IRAs. We believe that engaging our local citizenry in this monitoring effort will instill stewardship and build advocacy for protecting these areas. We plan to present monitoring results to the public and the land managers.

Initially, we developed maps and tables listing the IRAs and their acreages and then we prioritized them for monitoring. Monitoring entails a two-tiered approach beginning with an aerial overflight of each area. The aerial surveys are intended to provide a high-level screening that is then validated with on-the-ground surveys. Aerial and field monitoring together evaluate conditions relating to:

- Physical area, boundary condition and encroachment
- Wildlife habitat and ecological integrity
- Human use and activity

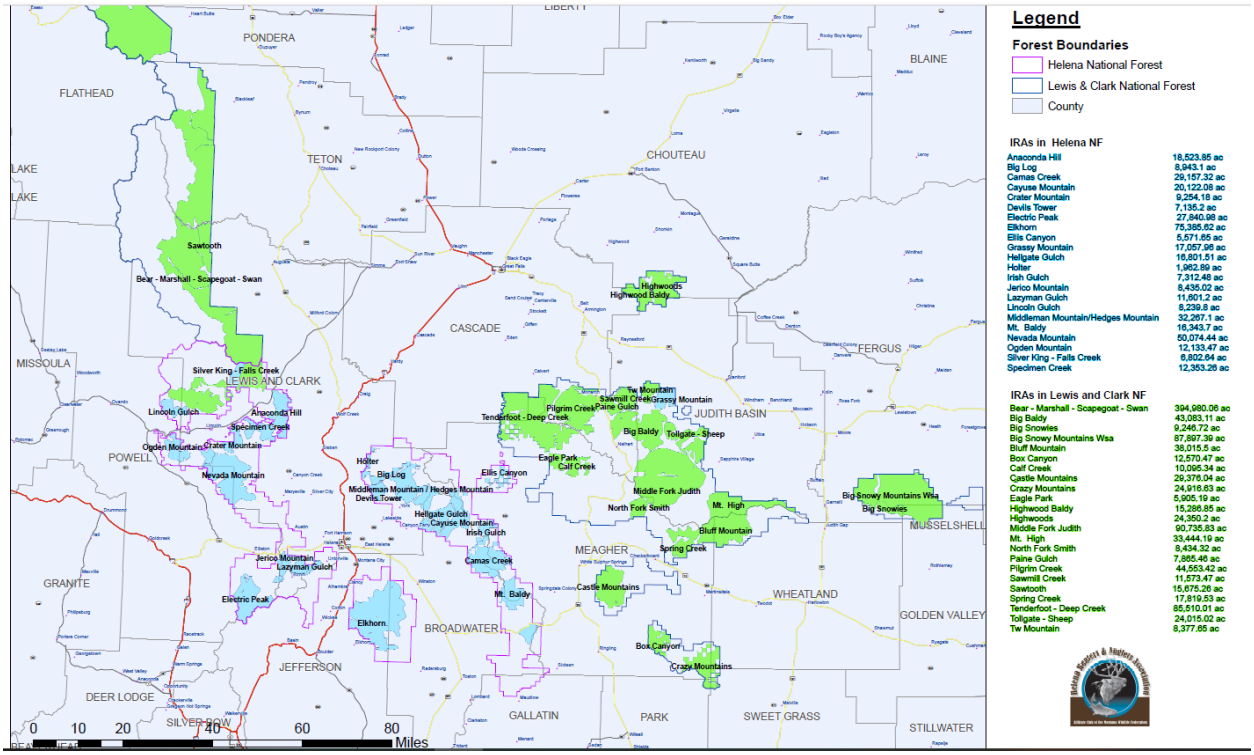


Figure 1. Helena-Lewis and Clark National Forest Inventoried Roadless Areas.

Presentation of results includes an assessment of ecological conditions (wildlife, vegetation, hydrology, etc.), human usage (recreation and other uses), and management direction and other factors that could influence the integrity of each IRA over the long term. Protocols for monitoring were developed in 2022 and field tested in 2023. Aerial and field monitoring was completed in 2024 for the Lazyman and Nevada Mountain IRAs. This assessment report represents the second product from this effort and provides an initial "report card" for the Lazyman IRA.

2001 Roadless Rule

Designation of Helena-Lewis and Clark National Forest's Inventoried Roadless Areas, their prescribed uses, and our basis for monitoring stem from the *2001 Roadless Area Conservation Rule* (36 CFR, Part 294, 66 Federal Register 3244-3272, Jan. 12, 2001). IRAs represent a non-legislative, potentially non-permanent protected status. In addition to the Roadless Rule, the Helena-Lewis and Clark National Forest is managed for a variety of uses under the provisions of the *2021 Land Management Plan, Helena*

Lewis and Clark National Forest (USDA Forest Service, R1-20-16, October 2021) and the associated Forest Travel Plans.

Management goals for Inventoried Roadless Areas are defined in the *Roadless Area Conservation Final Rule.* Individual IRAs are identified and mapped in the *Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2*, dated November 2000. The definition of a roadless area for the 2001 Roadless Rule included: undeveloped areas typically exceeding 5,000 acres that meet the minimum criteria for Wilderness consideration under the Wilderness Act and that were inventoried during the Forest Service's *Roadless Area Review and Evaluation (RARE II)* process, subsequent assessments, or forest planning.

The 2001 Rule described IRAs as potentially having some or all of the following characteristics (known as roadless area characteristics):

- High-quality or undisturbed soil, water, or air;
- Sources of public drinking water;
- A high diversity of plant and animal communities;
- Habitat for threatened, endangered, proposed, candidate, and sensitive species and for species dependent on large, undisturbed areas of land;
- Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
- Reference landscapes of relatively undisturbed areas;
- Natural appearing landscapes with high scenic quality;
- Traditional cultural properties and sacred sites; and
- Other locally identified unique characteristics.

The 2001 Roadless Rule establishes prohibitions and permissions on road construction, road reconstruction, and timber harvesting within designated IRAs. The Roadless Rule prohibits activities that have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics, and eliminates permanent road construction and reconstruction. "The unique contribution of inventoried roadless areas is important in maintaining habitats, natural processes, and remote recreation opportunities in the regional and national network of protected lands. Management activities shall follow direction found in the 2001 Roadless Rule (36 CFR 294 Subpart B, published at 66 Fed Reg. 3244-3273). There are approximately 1,499,181 acres of inventoried roadless areas within the HLCNF" (*2021 Land Management Plan, Helena Lewis and Clark National Forest*, October 2021). As previously mentioned, IRAs constitute approximately 50 percent of the land administered by the Forest.

Priority IRAs for Monitoring in 2022-2026

HHAA plans to monitor 22 IRAs totaling 393,204 acres that are located within the Helena National Forest portion of the HLCNF (Table 1). Initially, we decided to focus on the Continental Divide Landscape

portion of the Helena Forest. Realistically, we are learning that we can only expect to monitor one or two IRAs each year. IRAs targeted for monitoring in the first few years of our effort have included: Nevada Mountain (50,112 acres), Lazyman Gulch (11,608 acres), Jericho Mountain (8,440 acres), and Electric Peak (27,858 acres), although Monitoring Assessment reports have been completed for only two areas: Nevada Mountain and Lazyman. However, field work has been largely completed for Jericho Mountain so a report will be out in 2026-27, and field work has begun in the Electric Peak IRA. Additional monitoring for the following IRAs are planned, although the order is subject to change: Ogden Mountain (12,144 acres), Crater Mountain (9,261 acres), Anaconda Hill (18,536 acres), Lincoln Gulch (8,247 acres), Specimen Creek (12,362 acres), Silver King-Falls Creek (6,808 acres), and Elkhorn Mountains (75,415 acres).

Table 1. Inventoried Roadless Areas on the Helena National Forest portion of the HLCNF

INVENTORIED ROADLESS AREAS on the Helena National Forest	**ACRES**
Anaconda Hill	18,536
Big Log	8,948
Camas Creek	29,168
Cayuse Mountain	20,131
Crater Mountain	9,261
Devils Tower	7,139
Electric Peak	27,858
Elkhorn	75,415
Ellis Canyon	5,574
Grassy Mountain]	6,734
Hellgate Gulch	16,809
Holter	1,964
Irish Gulch	7,315
Jericho Mountain	8,440
Lazyman Gulch	11,608
Lincoln Gulch	8,247
Middleman Mountain/Hedges Mtn	32,282
Mount Baldy	16,349
Nevada Mountain	50,112
Ogden Mountain	12,144
Silver King-Falls Creek	6,808
Specimen Creek	12,362
TOTAL	**393,204**

https://www.fs.usda.gov/sites/nfs/files/legacy-media/helena-lewisclark/Volume%202%20-%20HLCNF%20Plan.pdf (Chapter 3, pg 65)

Overview of Lazyman IRA

The 11,608 acre Lazyman Inventoried Roadless Area (2021 Land Management Plan) (11,928 acres according to the Tenmile Ecosystem Watershed Analysis: *"11,928 acres of the Helena National Forest located within the Lazyman Gulch Inventoried Roadless Area"*) is located about three miles southwest of Helena between Interstate 15 on the east and U.S. Highway 12 on the north, in Lewis and Clark County. The Jericho Mountain IRA (and Continental Divide) parallels the Lazyman IRA on the west and is separated from it by Tenmile Creek. Prominent features include Colorado Mountain and Black Mountain, each over 7,000 feet in elevation, and several drainages that comprise a portion of the headwaters of Prickly Pear Creek. The Lazyman IRA falls in the middle of the Helena National Forest IRAs, ranking 13th in size among 22 IRAs, yet its more than 17 square mile area is impressively wild for occurring only three miles from Montana's capitol city. Figure 2 demonstrates this juxtaposition.

https://www.fs.usda.gov/sites/nfs/files/legacy-media/helena-lewisclark/Volume%202%20-%20HLCNF%20Plan.pdf

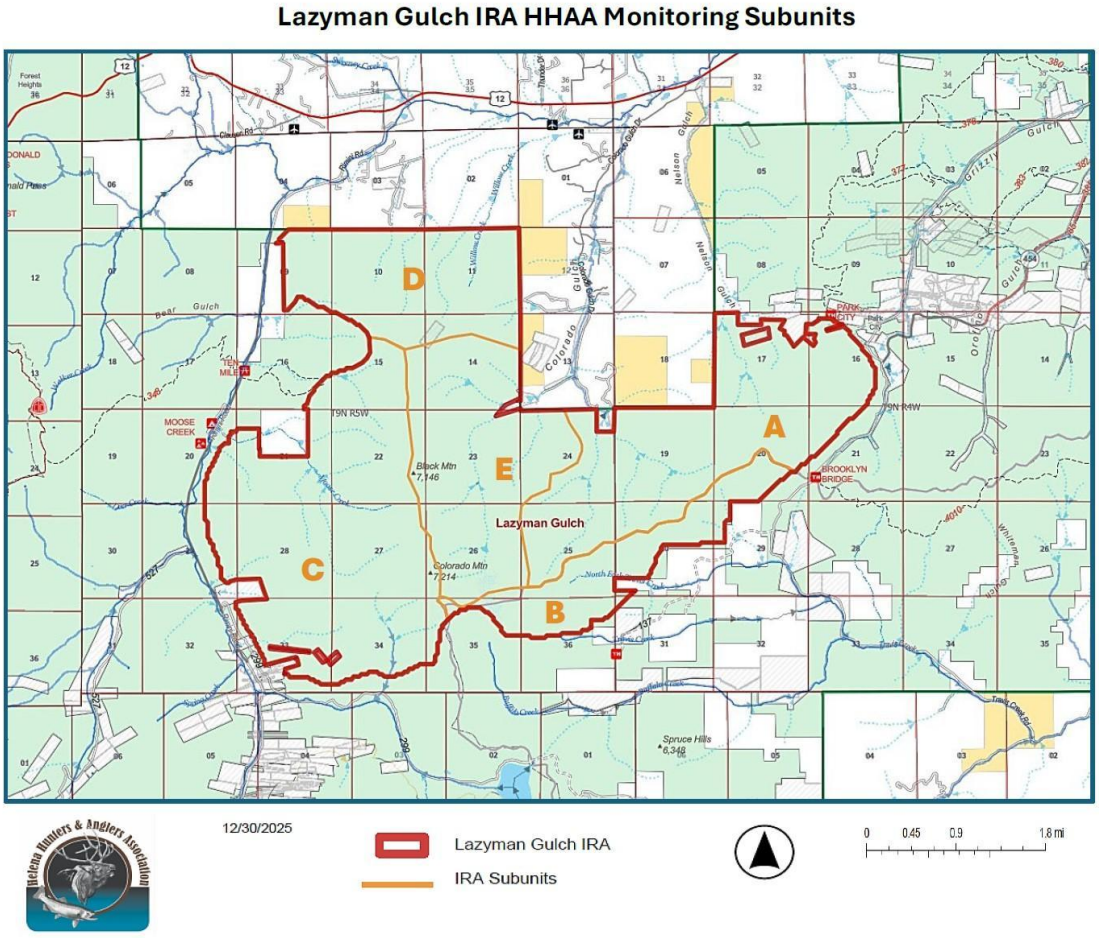


Figure 2. Lazyman Inventoried Roadless Area provides natural settings in an otherwise fragmented landscape, as well as a connection for wildlife movement corridors between the Continental Divide (Jericho IRA) to the west and to the Elkhorn Mountains IRA to the east.

The value of the Lazyman IRA natural landscape, because it occurs in close proximity to various human developments/disturbance, and yet is connected to wildlife corridors to the west on the Continental Divide and to the east through the Elkhorn Mountains, magnifies its importance for both wildlife and the need for human relationship to wild country.

National Forest lands east, south, and west of the Lazyman Roadless Area are roaded from past logging and mining activity. Small private land parcels adjoin the IRA on the north in Colorado and Nelson gulches, on the southeast in Travis Creek, and on the west in Tenmile and Moose creeks. In need of reclamation are illegal user-created routes that extend into the IRA from most of these private parcels.

Across the Nelson Gulch drainage to the north of the Lazyman IRA, non-motorized Forest Service lands encompass the Helena Ridge Trail and extend to the Mount Helena City Park between Highway 12 and Grizzly Gulch.

Although the Lazyman IRA is not technically on the Continental Divide, it is very close and provides an east-west conduit for wildlife movement between the Elkhorn Mountains (75,415 acre IRA) on the east via the Brooklyn Bridge-Skyhi Peak ridge and the Continental Divide on the west. The Continental Divide extends north-south through the adjacent Jericho Mountain IRA (8,440 acres). The Lazyman and Jericho Mountain IRAs are adjacent and within only a few hundred yards of each other, with only Tenmile Creek and the road extending from Rimini to Highway 12 separating them.

Ongoing research demonstrates that mountain corridors connect the HLCNF IRAs along the Continental Divide to the Crown of the Continent -- the transboundary region of the Rocky Mountains spanning northwestern Montana, southeastern British Columbia, and southwestern Alberta, with wildlife traveling south along the Divide to the Yellowstone Ecosystem. Lewis and Clark County recognizes the importance of the Continental Divide wildlife corridor in its *"Resolution to protect and promote the conservation of wildlife habitat and corridors on the Continental Divide"* (Appendix J: Resolution 2008-57, June 5, 2008).

Colorado and Black mountains provide an important source of high-quality water that contributes to streamflows in Tenmile Creek which is the largest source of the City of Helena's municipal water supply. These streams are vital to downstream fisheries and agriculture. Warming climate trends indicate lingering snowpack in high-elevation mountain headwaters will become even more critical as precipitation increasingly falls as rain.

Historical Background of Lazyman IRA

The Lazyman IRA is located three miles southwest of Helena and was originally a 13,000 acre mid-elevation wildland area. First proposed for Wilderness status in 1978 by local Helena residents, it would be another nine years before four non-governmental groups (NGOs) (Montana Wildlands, Montana Wilderness Association, Helena Forest Conservation Coalition, and the Black Mountain Wildlife Association) and hundreds of individuals were successful in lobbying the Lazyman area into a

congressional proposal for wilderness. The Lazyman area was renamed Black Mountain (in recognition of a prominent feature in the area) and the area was ultimately included in the 1988 Wilderness Bill which received support from Lewis and Clark County, City of Helena, State of Montana Governor's office, the US Congressional delegation (Max Baucus, Pat Williams, John Melcher), and governor Ted Schwinden. The U.S. Congressional Bill passed overwhelmingly by both houses of Congress only to be "pocket-vetoed" by President Regan. But advocacy for the area never waned.

Because two IRAs within the Helena portion of the Forest encompass a "Black Mountain," to avoid confusion, the name for the Lazyman/Black Mountain IRA has reverted to "Lazyman."

Wilderness support for the Lazyman/Black Mountain area arose after the Helena National Forest released a November 1, 1976 draft logging plan for the Lazyman Area (Helena Independent Record (IR) 1-31-1978 *"Protestors have say at forest meeting"* by Bill Skidmore). About 100 people from Unionville, Rimini, and Colorado Gulch objected to the "CUT" Colorado-Unionville-Travis land use plan to log the area by the Helena National Forest. The group pressed for the area to be considered for Wilderness designation. In April 1979, the RARE II (Roadless Area Review and Evaluation II) FEIS was released and Lazyman was included as Inventoried Roadless Land #1608.

In 1984, the Forest Service proposed another timber sale in the Lazyman Area, and labeled Lazyman the "Black Mountain Roadless Region" (Helena IR, 3-15-1984, *"Helena's closest roadless area proposed for timber cut"*; and Helena IR, 3-21-1984, *"Nobody happy after discussions on nearby timber sale"* by Bill Skidmore.) The sale was to begin in 1988. However, that sale was preempted by a U.S. Congressional bill designating Lazyman/Black Mountain as Wilderness. Four NGOs (Montana Wildlands, Montana Wilderness Association, Helena Forest Conservation Coalition, and the Black Mountain Wildlife Association) and private citizens, all lobbied for inclusion of the area into a congressional proposal for Wilderness (Helena IR, 4-10-1987, *"A wild proposal for Helena*" by Bill Skidmore).

With the support of Lewis and Clark County, City of Helena, State of Montana Governor's office, the U.S. Congressional delegation (Max Baucus, Pat Williams, John Melcher), and governor Ted Schwinden, Lazyman – by then called Black Mountain, was recommended for Wilderness. The Congressional Bill was passed unanimously by both houses of the U.S. Congress, however the bill was not signed by President Regan. This 1988 "pocket-veto" prevented the bill from becoming law.

In the interim, the Helena National Forest Management Plan was released in 1986 wherein the Lazyman IRA was recognized as Inventoried Roadless Area 1608.

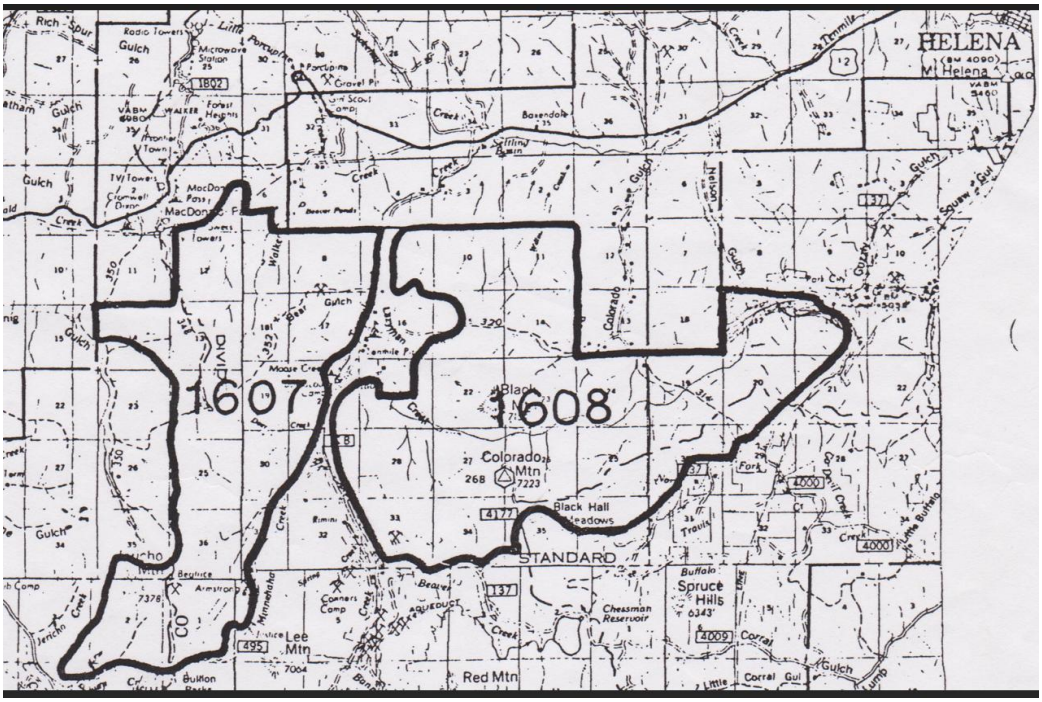


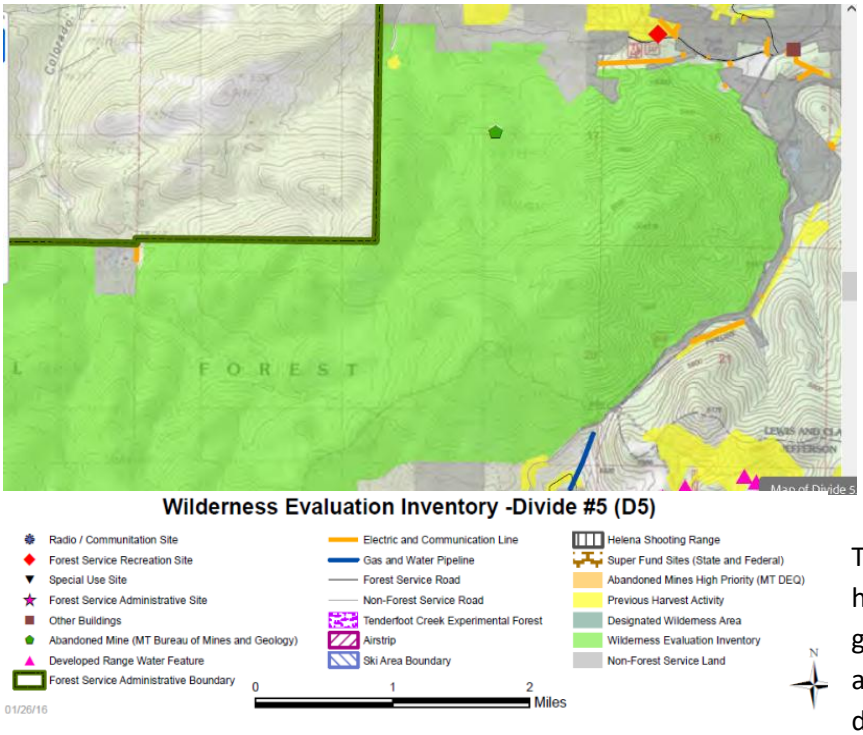
Figure 3. Map of Lazyman Inventoried Roadless Area (1608) in Helena National Forest 1986 Forest Plan, and the Jericho Mountain IRA (1607).

In October 2014, the Helena-Lewis and Clark National Forest released a scoping proposal for the Tenmile Helena South Hills Project which included logging portions of the Lazyman/Black Mountain Area. The City of Helena enacted resolution No. 20106 to form the Tenmile/South Helena Forest Restoration Collaborative Committee to make recommendations to State and Federal agencies on projects in the Tenmile municipal watershed and South Helena area. The group voted unanimously to keep heavy equipment out of the Lazyman Inventoried Roadless Area, in order to allow for possible designation of the IRA as Wilderness. The Collaborative recommended protecting roadless area values in the project area, especially in the Lazyman IRA which had previously been proposed for Wilderness designation.

Helena Hunters and Anglers Association (HHAA) (with some of the same members as were present from the 1976 endeavors) challenged proposed road construction into the Lazyman IRA in 2018 as part of the Tenmile-South Helena Vegetation Manipulation Project. During the litigation process the District Court judge directed HHAA to supplement the record when "findings of fact" between the Helena-Lewis and Clark National Forest and HHAA materially differed. As a result of intensive photographic field surveys compiled by HHAA that revealed that "roads" which the Forest Service planned to utilize did not actually exist, the Court ruled against the portion of the project that would have occurred within the Lazyman Inventoried Roadless Area.

Because HHAA has catalogued an extensive photographic library of the Lazyman IRA within 43 individual field surveys, baseline information is comprehensive for current and future monitoring efforts (Table 2).

Divide Travel Plan and Lazyman IRA



Motorized access into the Lazyman IRA is banned by the Divide Travel Plan (2016).

Figure 4. Map of Lazyman Inventoried Roadless Area in 2016 showing its boundary extending to the county road between Helena and Clancy. (FS pdf: fseprd490505)

Diminishing Size of Lazyman IRA

The actual boundary of the IRA has not been defined on the ground, but the original 11,928 acre Roadless Area has diminished with each iteration of Forest project planning. Figure 4 shows the 2016 Lazyman IRA boundary immediately adjacent to the County Road compared to Figure 5 depicting the diminished 2021 boundary which resulted in timber harvest activity during the Tenmile-South Helena Project.

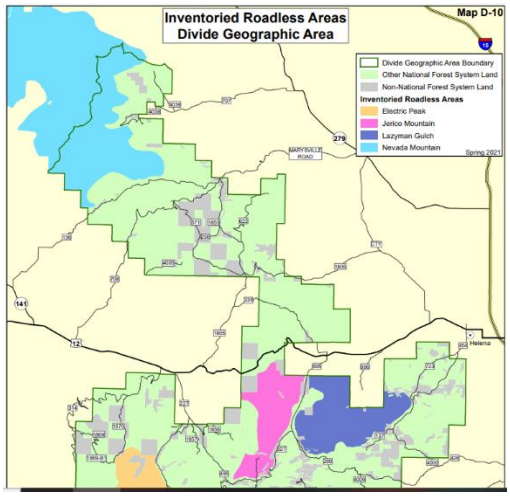
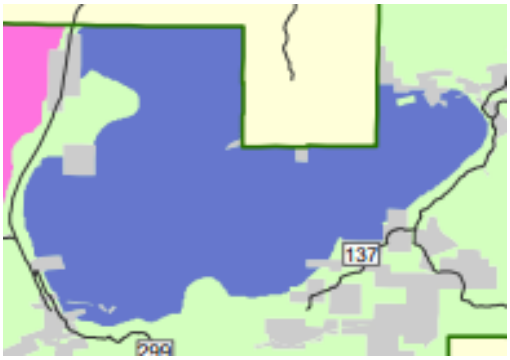


Figure 5. Map of Lazyman Inventoried Roadless Area in 2021 showing that its boundary has been diminished compared to previous maps. Second map zooms in to the Lazyman IRA.



HHAA contends that the original boundary of the Lazyman IRA should be reinstated (its current condition not withstanding) because there was no public process to diminish the size of the IRA.

In October 2021, a new Forest Plan was completed for the Helena-Lewis and Clark National Forest. The ROD did not designate any of the nearly 12,000 acre portion

of the Lazyman IRA as Recommended Wilderness even though it meets most criteria for such designation.

The Lazyman Inventoried Roadless Area is reported as 11,608 acres in the 2021 Land Management Plan, although the stated acreage is larger in the Tenmile Ecosystem Watershed Analysis: *"… 11,928 acres of the Helena National Forest located within the Lazyman Gulch Inventoried Roadless Area."*

However, the "Existing Situation" in 1983, when the Roadless Area Review and Evaluation occurred on the Helena National Forest, listed the Lazyman IRA as being 12,700 acres. The RARE II inventory, established in 1979, helped inform land management decisions and is still used as a basis for identifying Inventoried Roadless Areas (IRAs) in some cases.

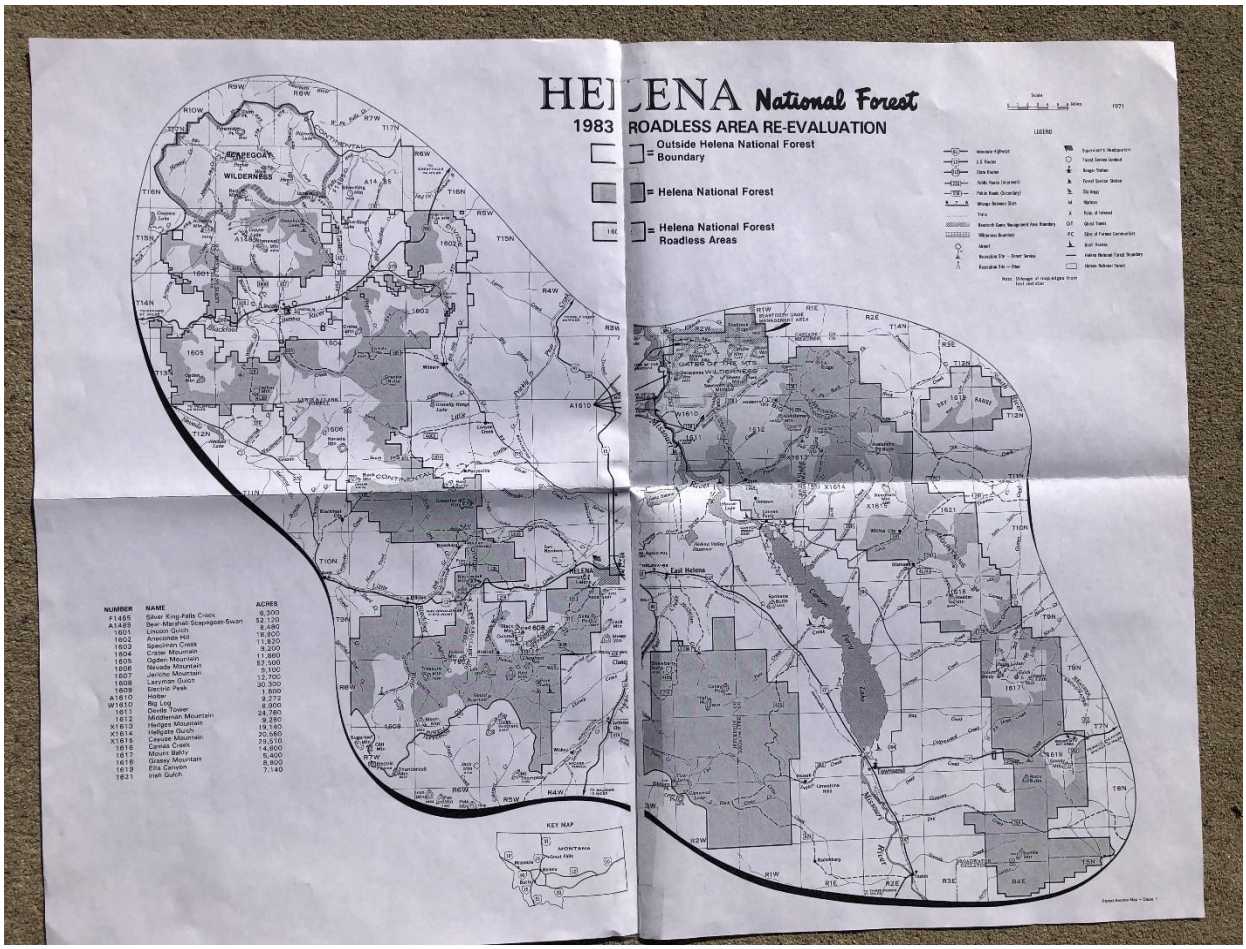


Figure 6. Roadless Areas on the Helena National Forest in 1983, with acreages for individual roadless areas. The Lazyman IRA was listed at 12,700 acres.

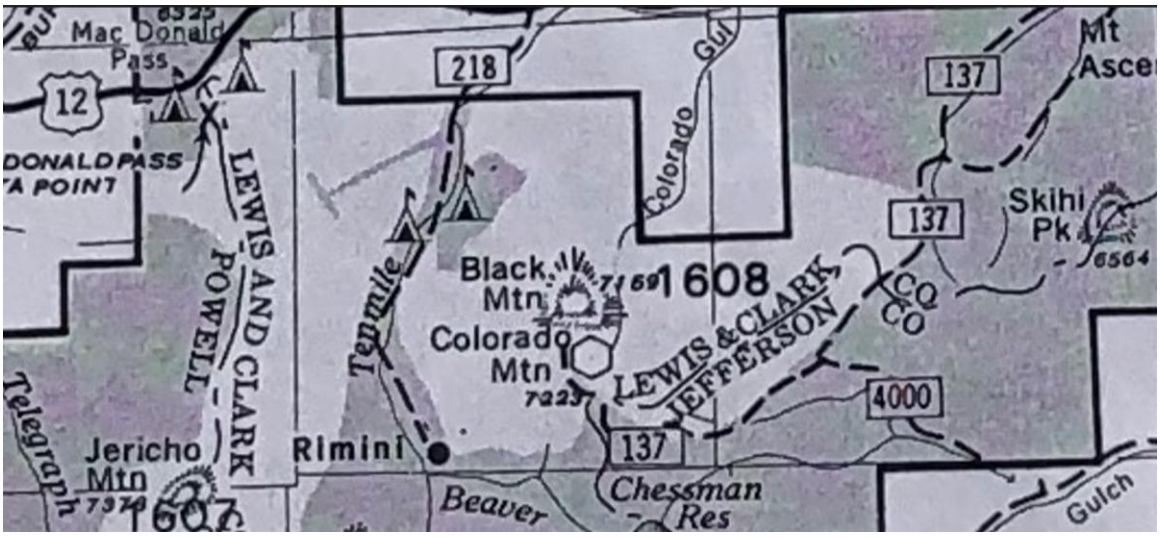


Figure 7. Expanded portion of 1983 Roadless Area map showing the eastern boundary of the Lazyman IRA extending to the County Road (dashed line labeled 137) between Unionville and Clancy.

Alternative D of the Record of Decision for the 2021 Helena-Lewis and Clark National Forest Plan references the "Colorado Mtn Wilderness Area" and indicates the area is 8,168 acres in size (2021 Plan ROD pg 20; and pg 29 rwa-14 MAP of Colorado Mtn Recommended Wilderness Area.) FEIS Vol IV (pg 91) in a different size and type than used in the document, inserts an acreage of 8,168 acres for the Colorado/Lazyman area. The area mapped in Map RWA-14 shows a much larger area. So, this 8,168 acre number for the Lazyman area (in 2021) was ratcheted down yet again even though the earlier acreages of 11,928 and 12,700 have previously defined the area.

The Lazyman IRA meets the following criteria for Wilderness as noted in the FEIS Vol. IV Appx E. Recommended Wilderness Analysis Process,

> "A wilderness area must meet size criteria set forth in Forest Service Handbook (FSH) 1909.12, chapter 70. Lands included in the wilderness inventory within the HLC NF met one of the following size criteria: • National Forest System Lands outside of existing designated wilderness that were at least 5,000 contiguous acres or greater…

Important to note that the 2021 Forest Plan states,

> "Under all alternatives the acreage and distribution of Congressionally designated Wilderness, conservation management area, and IRAs would not change from the existing situation," (2021 Plan pg 66 in wolverine section).

And yet, the acreage defining the Lazyman IRA has consistently been administratively diminished over the years. The 2021 Forest Plan ROD (pg. 57) seems to try to justify the smaller referenced size of the IRA by stating:

> "Roadless Area Conservation Rule Management direction for IRAs is compliant with the 2001 Roadless Area Conservation Rule (36 CFP. 294 Subpart B, published at 66 FR 3244-3273). The 2001 Roadless Conservation Rule includes a prohibition on road construction and road reconstruction in IRAs and prohibitions on timber cutting, sale, or removal except in certain circumstances."

Helena Hunters and Anglers Association is concerned that by giving the Lazyman IRA a Wilderness option of 8,168 acres in Alternative D and calling it the proposed Colorado Mountain Wilderness Area rather than Lazyman, and referring to it in the Environmental Impact Statement that preceded the 2021 plan, that the FS may be trying to conclude that this action absolves them from considering the full extent of the area under Roadless Rules, both currently and in the future. We would like clarification on this issue, and believe that the original size of the Lazyman IRA (12,700 acres) should be honored, and areas that have been disturbed be renovated to their original Roadless Area condition.

METHODS

Monitoring methods are detailed below. Refinements and possibly streamlining are likely to occur as we gain field experience and test our methods. HHAA recruited volunteers for monitoring each of the roadless areas covered. The team gathered data following the protocols detailed below. As the program expands to include multiple volunteers, training will be provided in data gathering, and quality assurance measures will be employed to ensure data collection comparability and consistency (precision and accuracy) within and across IRAs.

Monitoring entailed a two-tiered approach beginning with an aerial overflight of each area. The aerial surveys provided a high-level coarse screening for later validation with the on-the-ground data gathering and observations. Both aerial and ground monitoring activities included observation of anthropogenic and natural stressors resulting from a combination of Forest Travel Plan implementation and compliance, forest management activities such as timber harvest and prescribed burns, recreational activities (legal and illegal), overall forest health and succession, disease and insect infestations, noxious weeds, vegetation, wildlife and hydrologic conditions. A list of key questions for each criterion has been included within field forms and provides the basis for the scoring. Some general examples include the following: Is the roadless area boundary accurately described in the Forest Plan and the associated Travel Plan and is it intact physically? Is there evidence from the aerial and/or ground surveys of illegal trails/user created routes – both motorized and non-motorized? What is the overall forest health condition, etc.?

Subunit delineations -

Where practical, each IRA was divided into several subunits to ensure that monitoring was representative of the entire IRA. Subunit delineation was done as a group effort and considered access, hydrologic boundaries/sub watersheds, management authority (i.e. multiple USFS ranger districts), elevation, adjacent land ownership and uses, and other criteria.

Aerial Overflights -

Aerial overflights were performed by pilot Doug Powell and, in some cases, an observer who recorded notes and took photographs. Aerial surveys noted vegetation health and types, wildlife, boundary conditions and encroachment, adjacent land uses, livestock grazing, recreational use, travel plan compliance and illegal trail or road construction, and other general observations. Aerial data were recorded on a field sheet (Appendix A), digital photographs were taken, and map locations were recorded with the Avenza mapping app onto digital satellite imagery.

Field Surveys -

On-the-ground field surveys collected information on boundary condition, hydrology, wildlife, vegetation, human uses, and general observations following the protocols described below (Appendices

B – G). A field monitoring summary guide sheet used to advise field assessments is included in Appendix H. A log of field monitoring trips by date and location is included in Appendix I. Completed field forms used to catalogue information for each module and for the aerial surveys are housed in HHAA office files.

Boundary Condition -

Rationale: Land ownership, land uses and management of lands bordering IRAs may influence the long-term integrity of the IRAs and their ability to maintain key values. A buffer zone surrounding each IRA that has minimal development is desirable. This assessment category is to provide documentation of current conditions which are likely to be influenced by management and human uses.

Encroachment may occur within the mapped boundary of an IRA - inadvertently or purposely. Forest management activities such as logging, public uses such as firewood cutting, and illegal trails constructed from adjacent private property where it is not visible to the public or managers, are all documented examples of encroachment in IRAs on the HLCNF in recent years. Monitoring of IRA boundaries for these problems is warranted.

Scoring: Assign a score of 0-10 for this evaluation category, considering following extremes:

10 = IRA boundary is entirely publicly owned lands with a minimum level of development activity. No unauthorized activities are known to have occurred or are presently occurring;

1 = Intensive land use/management activities and roads are present along some portion of the periphery of the IRA; Portion of the IRA boundary are private lands affording opportunities for unscrutinized encroachment and illegal activities and a reduced ability to monitor and protect IRA values. Unauthorized activities have or are currently negatively affecting the IRA.

Some of these are YES/NO questions, therefore only 10 or 1 is applied as a score. Otherwise, it will appear that an illegal activity is only partially wrong.

Field:

- Are the boundaries intact?
- Are boundaries mapped and available as per 2001 Roadless Rule?
- Distance to human habitation in meters (within ¼ mile). Denote on map.
- Distance to other human activities (within ¼ to ½ mile). Denote on map.

1. Identify the presence of unauthorized travel-related activities, including motorized and non-motorized recreation, trail building, violations of Forest Travel Plan travel restrictions.

2. Identify the presence of encroachment into the designated areas by management activities such as logging, forest road construction, unauthorized livestock grazing, firewood gathering, Private land activities encroachment, and other activities.
3. Identify intimidation designed to keep the public out of IRA: signage; fences/gates by private entities on public lands.
4. Identify agency actions that could prevent the public from monitoring activities that may not be legal or are not following FS protocols, e.g. excessive area closures.
5. Are the IRA boundaries described in the Forest Plan and associated Forest Travel Plans? Are maps available?
6. Does signage occur at all IRA entrances?
7. Are travel restrictions being monitored and enforced?
8. Is monitoring and enforcement of designated uses apparent or lacking?
9. Are the boundaries identifiable on the ground through any means?
    a. Is this IRA circumnavigable on the ground?
    b. How many days and people would it take to complete a boundary check?
    c. Would HHAA be allowed to physically "mark" the boundary? And if so, with what?
10. Other?

Office:

1. What is the designated acreage of the management unit/IRA?
2. Are actual acreages consistent with mapped acreages?
3. Google Earth aerial photo evaluation and flights with photos by HHAA

Hydrology -

Rationale: Many IRAs are important snowpack areas providing water supplies for multiple downstream uses, including fisheries. Precipitation amounts and timing have a direct influence on plant communities, wildlife, aquatic resources, and wildfires.

Scoring: Assign a score of 0-10 for this evaluation category, considering following extremes:

10 = Hydrology appears to be functioning properly within the constraints of climatic variables.

1 = Persistent drought conditions and water diversions are altering plant communities, degrading riparian habitat, affecting fisheries, and reducing streamflows.

Field:

- Sedimentation, headcuts, dredging. Photos/GPS location
- Catastrophic erosion event/washout. Photos/GPS location
- Evidence of hydrologic impacts of wildfire (streamflow and erosion). Photos/GPS location
- Riparian trampling. Photos/GPS location

Office:

1. Streamflow conditions and trends (visual observations and statistics from USGS gauging stations, where available: https://waterdata.usgs.gov/mt/nwis/rt

2. Snowpack conditions and trends from visual observations and statistics from NRCS SNOTEL sites, where available: https://www.nrcs.usda.gov/programs-initiatives/sswsf-snow-survey-and-water-supply-forecasting-program

3. Statewide drought index maps (https://drought.mt.gov)

4. MT DEQ water quality databases, TMDL information, integrated statewide report, etc.

5. FWP fisheries info; Heritage Program data.

Wildlife -

Rationale: IRAs provide important habitat and security cover for big game and a variety of sensitive and endangered wildlife species. IRAs also contribute to a geographical network of wildlands that serve as linkage corridors for wildlife movement and the exchange of genetic material between isolated subpopulations. The status of wildlife populations within IRAs, including seasonal usage, provides a direct measure of biological integrity.

Scoring: Assign a score of 0-10 for this evaluation category, considering following extremes:

10 = Excellent wildlife diversity and sex and age structure, including a mix of predator and prey species and a demonstrated presence of sensitive and endangered species.

1 = Ecological or anthropogenic variables appear to have reduced wildlife use of the area to a bare minimum.

Field:

1. Note observations of wildlife: squirrels, chipmunks, nutcrackers, camp robbers (gray jays), woodpeckers, etc. [1 point for each wildlife species encountered – assume score would easily make it to 10]
2. Note tracks of wildlife (species); scat (species); rubs (elk/deer/moose); scrapes (lion); porcupine bark feeding; bedding areas and number of beds [1 point for each type of field sign encountered – assume score would easily make it to 10]
3. Wildlife - Trail Cam data – regularly establish then check sites to hopefully document rarer species.

Office:

1. Are wildlife populations healthy and diverse? [10 = very]
    a. If positive or negative trends exist, do we know the causes (e.g. predation, habitat changes, hunting pressure, harboring on private, adjacent land use changes, climate/drought, etc.
    b. Metrics:
        i. Elk Plan objectives being met for Elk Management Units overlapping the IRA:
            1. Population levels below or above objective Up (5)/Stable (10)/Down (1) (within 10% of objective)
            2. Bull:Cow ratios
                a. At or above objective = 10;
                b. Below objective by 1-9% = 9
                c. Below objective 10-19% = 3
                d. Below objective 20-29% = 1
            3. Calf:Cow ratios
                a. At or above objective = 10;
                b. Below objective by 1-9% = 9
                c. Below objective 10-19% = 5
                d. Below objective 20-29% = 4
                e. Below objective 30-39% = 3
                f. Below objective 40-49% = 2
                g. Below objective 50% or more = 1

        ii. Management Plans for other species: mule deer; mountain goats; bighorn sheep. Are objectives being met? Yes = 10 No = 1
        iii. Aerial survey trends at the Hunting District level from MFWP biologists
            1. Up (5)/Stable (10)/Down (1) (within 10% of objective)
        iv. Is disease an issue within or near the IRA? (CWD, brucellosis, avian influenza, pneumonia) YES = 1 NO = 10
2. Known presence of Sensitive, Threatened, Endangered species in the area? (list for each IRA – refugia for such species in an otherwise altered landscape)) Scoring for each category: YES = 10 NO = 1.
3. Critical wildlife habitat – does it exist in this IRA? Yes = 10 No = 1
    a. Sensitive:
    b. Threatened:
    c. Endangered:
4. Critical wildlife habitat – does it exist in this IRA? Yes = 10 No = 1
    a. For species that do not migrate – mountain goats
    b. Denning areas; nesting areas; hibernacula; are elk (ungulate) parturition/nursery, wintering, and summering areas included inside the IRA?
5. Connectivity or movement corridors – do they occur in this IRA? Are approximate maps available?

a. Genetic Connectivity: Species known to move through the area (g. bear, wolverine, lynx, wolves)
b. Movement corridors for seasonal migration: elk, mule deer, bighorn sheep, moose, herps

6. Wildlife - Trail Cam data – regularly establish then check sites

Office:

1. Sensitive species presence (sightings, tracks and scat, trail cameras)
    i. Heritage Program reports
2. Fisheries data (where available, e.g. Blackfoot Watershed)
3. Other indicator metrics from university and other researchers
4. Agency monitoring efforts (grizzly, lynx, wolf, wolverine, etc.)
    i. grizzly: MFWP
    ii. lynx: FWS, Wild Ideas LLC
    iii. gray wolf: MFWP; Heritage Program
    iv. wolverine: universities, Wild Ideas LLC

Plants/Vegetation –

Rationale: Plant communities within IRAs provide food and cover for wildlife and define "forest health." The Natural Range of Variation (NRV) describes the diversity of forest conditions that provides the full range of habitat conditions that would support the natural diversity of both flora and fauna. It is important to evaluate how the existing forest conditions compare to the NRV to understand how well the plant and animal communities are functioning.

Field: Site-specific field trips were conducted to document vegetation conditions, such as:

1. Overall forest condition
2. Presence and spatial extent of insect infestations/beetle kill
3. Presence and spatial extent of noxious weed infestations
4. Evidence of wildfire and/or prescribed burns
5. Is forest succession/regeneration apparent following disturbances (insects, fire)
6. Riparian health and apparent causes of any degradation
7. Unique/rare/sensitive species: orchids, white bark pine, etc.
8. Species diversity
9. Conifer encroachment and/or sagebrush on meadows and parks
10. Noxious/county listed weeds: toadflax, knapweed, leafy spurge, hound's tongue, Canada thistle, musk thistle, hawkweed, black henbane, bindweed, whitetop, oxeye daisy, common tansy, hoary alyssum, smooth brome, Japanese brome, cheatgrass, mullein, etc.

Office: In addition to field observations, data from remote sensing and vegetation modeling systems were assessed to compare selected existing conditions within the IRA to those described for the Geographic Area(s) in the Helena-Lewis and Clark Forest Plan. The Lazyman IRA is found within the Divide Geographic Area as defined in the Forest Plan. Using the same processes as the Forest Service employed – cover type, size class, canopy density, and past fire history were examined as a measure of

how existing conditions met Forest Plan and NRV expectations for the area. Please see Appendix L, "General Forest Area Condition Lazyman Inventoried Roadless Areas" for the complete methodology and report.

Scoring: Assign a score of 0-10 for this evaluation category, considering following extremes:

For the forested areas, scoring is based on how well current vegetative conditions meet what would be expected for them to be within the Natural Range of Variation (NRV). A score of 10 indicates the cover type, size class, density class and disturbance regimes (fire, disease, insect infestation, etc.) are all represented to be within the NRV. A score of 5 indicates around 50% of these elements function with the NRV but others do not. A score of 0 indicates none of the elements are within the NRV.

For grass and shrublands a score of 10 would indicate their distribution is within the NRV and noxious weeds are not present. A score of 5 indicates there has been a reduction in their distribution and/or some noxious weeds are present at a moderate level. A score of 0 indicates a severe loss of their distribution and/or noxious weeds are very common with infestation levels over a significant portion of the IRA.

Human Use and Activity -

Rationale: IRAs provide a diversity of high quality non-motorized human recreational opportunities. However, recreational overuse can directly and negatively impact wildlife and other ecological processes. Recreational use on all public lands has shown rapid increases since the 2020 Covid pandemic. This trend poses a significant threat to the long-term integrity of IRAs and should be monitored – including authorized and illegal recreational activities.

A variety of other (non-recreational) human uses take place on forest lands and may impact the integrity of IRAs. Monitoring of these activities (authorized as well as illegal) will occur as part of this plan and any impacts noted. Examples include livestock grazing, firewood gathering, mining/prospecting, and others. Some of these uses may overlap with so-called recreational uses.

Scoring (Do not score individually, but document to indicate areas where the overall IRA score/ranking can be improved upon). Overall score: No specific land use = 10; 1 land use = 5; 3+ adjacent uses = 1

Field:

1. What recreational uses are occurring during what seasons and at which locations?
2. Are recreational uses occurring illegally - in opposition to Travel Plans?
3. Is recreational use interfering with other values associated with the IRAs?
4. Vehicle counts at trailheads and other access points.
5. Aerial and ground level observations (snowmobiles, skiers, bikers, ATVs, wood cutting; tracks, cut trees/shrubs, gravel placement at water crossings, constructed facilities such as tree stands, lean-tos, water pipes, ground leveling, corrals, etc.).
6. What other human uses are occurring within the IRAs besides recreation?
7. Identify these activities and associated trends and gauge impacts.

8. Are these activities consistent with Forest Plan direction and area management prescriptions?
9. Examples could include livestock grazing, firewood cutting, mining/prospecting, foraging, fishing, hunting, trapping etc. Some of these activities overlap with the recreational use category.
10. Describe adjacent land use – heavily roaded; agricultural; logged (how recently; monoculture?); mining; recreational use (ski area; ATVs; mountain bike)
11. Does the IRA landscape status contrast with surrounding areas within ½ mile? In what way?
    - Roads, motorized trails Yes/No
        - Occur along 10% or less of boundary (10)
        - Occur along 25% of the boundary (9-5)
        - Occur along 50% of the boundary (3-0)
        - Occur along 75% of the boundary (0)
        - Occur along 91-100% of the boundary (0)
    - Recreational facilities Yes (0)/No (10)
        - Facilities themselves; infrastructure; roads accessing
    - Timber harvest Yes (0)/No (10)
        - past (>5 years old)
        - present (0-5 years)
        - future (planned within 10)
    - Agricultural Yes/No
        - No agriculture (10)
        - Along 10% or less of boundary (8-9)
        - Along 25% of boundary (5-7)
        - Along 50% of boundary (3-4)
        - Along 75% of boundary (2)
        - Along 91-100% or more of boundary (1)
    - Houses
        - No houses (10)
        - Along 10% or less of boundary (8-9)
        - Along 25% of boundary (5-7)
        - Along 50% of boundary (3-4)
        - Along 75% of boundary (2)
        - Along 91-100% or more of boundary (1)

Office: (review of the above when scoring in the office)

1. Is recreational use increasing and/or changing?
2. Online databases (Trailforks, CDNST use, etc.)
3. Hunter, fisherman, and trapping use from MFWP surveys

General Observations -

Rationale: There may be additional concerns and observations that won't be captured by the prior assessment categories. Record general positive and negative aspects and assessment of conditions

observed in each subunit. Record any general observations not captured on any of the other monitoring forms. This category is not being scored.

RESULTS

Subunit Delineations -

Five aerial surveys of the Lazyman Inventoried Roadless Area were conducted between 2019 and March 2026. Field monitoring surveys of the Lazyman IRA, representing the entire area, were largely initiated in 2020 (see IRA field monitoring and incident reports at https://helenahuntersandanglers.org/our-impact/habitat/). With the advent of the Tenmile-South Helena Vegetation Manipulation Project, the Forest Service intended to access the IRA using routes that they claimed existed on the ground. HHAA provided photographic evidence to Montana's Federal District Court demonstrating that such routes either do not exist or that major reconstruction would be required to accommodate the desired project access. Ultimately, access into the IRA was denied. Additional field surveys involved incidents in which HHAA photo-documented unauthorized human activity within the IRA.

The Lazyman IRA was sub-divided into five units for field assessment purposes, as follows:

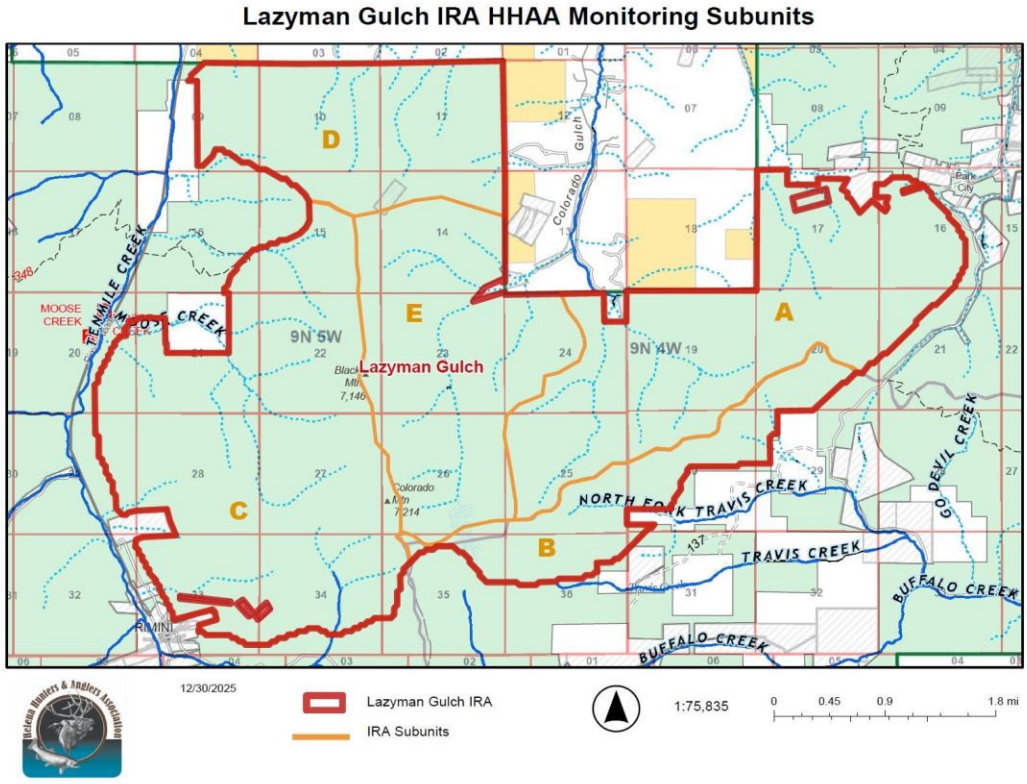


Figure 8. Subunits within the Lazyman Inventoried Roadless Area.

Legal Descriptions of Subunits

Subunit A: Area includes drainages of East Fork of Colorado Gulch, Nelson Gulch, Grizzly Gulch. Area is the northeastern subunit of the Lazyman IRA and extends east from the hydrologic divide between the West Fork of Colorado Gulch Creek and the East Fork of Colorado Gulch Creek along the northern edges of Sections 24 and 19 then north along the western edge of Section 17, then easterly through the northern portion of 17 and 16, then south paralleling the county road through northwest 21, then westerly along the hydrologic divide between Nelson Gulch, Colorado Gulch, and Travis Creek through Sections 20, 19, 30, and 25 (near the southeast edge of Blackhall Meadows), then northerly along the hydrologic divide between the East Fork and the West Fork of Colorado Gulch in Sections 25, 26 (tiny portion along NE edge), through 24 to its northern edge, the point of beginning between the W. and E. Forks of Colorado Gulch.

Subunit B: Area includes all drainages of Travis Creek (western tributaries). Area is the southeastern subunit of the IRA and extends south and west from the hydrologic divide in SE¼ of Section 20 between Grizzly Gulch on the north and Travis Creek on the south (adjacent to the county road on the divide between Lewis and Clark County and Jefferson County); then around private land in a southwesterly direction through Section 20, 29, 30, 31 (tiny portion in northwest corner), then north along the western edge of Section 36 along the hydrologic divide that separates Travis Creek, Buffalo Creek, Beaver Creek, and Colorado Gulch; then northeasterly along that divide through Sections 25, 30, 19 (SE corner), and 20, the point of beginning between Grizzly Gulch and Travis Cr. A portion of Blackhall Meadows is included.

Subunit C: Area includes drainages of Beaver Creek, Tenmile Creek, Moose Creek and Lazyman Creek. Area is the western subunit of the IRA and extends from the top of Colorado Mtn south along the Section boundary between 27 and 26, southeasterly along the Colorado Mtn trail to Beaver Creek in Sections 26 and 35, then southwesterly through Section 35, then through the southwestern corner of Section 34 where it intersects with the Beaver Creek Road (299) west along the southern boundary of Sections 34 and 33, then northwest through Section 33,then north through the eastern half of 29 and 20, then east and north through 21 around private land in Moose Creek, then north through the SE corner of 16, then making a curve through 15 east then north (IRA includes upper reaches of Lazyman Creek), then the boundary takes a sharp turn to the southeast through the NW ¼ of Section 15 to the hydrologic divide between Lazyman Creek and Willow Creek, south through 15 along the hydrologic divide between Lazyman Creek and Colorado Gulch, south through the eastern half of Section 22, and to the top of Colorado Mtn at the center of the east edge of Section 27, the point of beginning at the top of Colorado Mtn.

Subunit D: Area includes Willow Creel and headwaters of lower Colorado Gulch and drains toward Highway 12. Area is the northwestern subunit of the IRA and includes all tributaries of Willow Creek in Sections 9, 10, 11, northeastern portion of Section 15 and northern portion of Section 14 along the hydrologic boundary between Willow Creek and Lazyman Creek; Subunit D also includes the upper tributaries of the North Fork of the West Fork of Colorado Gulch in the N½ of 14, and the W½ of 11.

Subunit E: Area includes Blackhall Meadows north and upper drainages of West Fork of Colorado Gulch. Area is in the donut hole in the center of the IRA and is surrounded by the other four Subunits. Beginning at the top of Colorado Mountain on the center east edge of Section 27, north along the hydrologic boundary between the West Fork of Colorado Gulch and Tenmile Creek, through the northeast corner of 27, eastern portion of 22, southeast portion of 15 then east to the north half of 14 to the east edge of 14, then south along the east

edge of 14 to Section 23, then east to the northern edge of Section 24, then south along the hydrologic divide between the West Fork and East Fork of Colorado Gulch through Section 24 to the northeast corner of Section 26, then southerly along the eastern edge of 26 to the hydrologic divide between Colorado Gulch, Buffalo Creek, and Beaver Creek, then west along said divide to the Colorado Mountain trail (4177), then north along the trail to the top of Colorado Mtn, the point of beginning.

Table 2 displays 53 field monitoring ground surveys (including incident reports) and four aerial surveys conducted by HHAA members over the period from May 2017 to April 2026. Monitoring reports, field sheets, and associated photographs are provided in Field Reports for each Subunit (page 43).

TABLE 2 . Lazyman Inventoried Roadless Area – Monitoring Routes

Subunit	Route# [1]/Monitoring Area/Incident Rpt # During TSH Proj / Lazyman Monitoring Area Name Incident Report = I: Action Report = A:	Date	Location	Surveyors	Field Report Name/Info (pdf files)
	HHAA Meeting to establish process	2023-08-02	Powell, Ingman, Westfall, Milburn, Joslin		2023-08-02: Committee Meeting-Nevada & Lazyman
	HHAA Meeting – defining process	2024-02-14	Powell, Ingman, Westfall, Milburn, Joslin		2024-02-14: Committee Meeting IRA report write-ups
	Lazyman IRA Hydrology	2025-12-31	Lazyman IRA drainages: Tenmile & LPP	Ingman	Lazyman IRA Hydrology-pending Ingman
A-B	4000 All routes & 647 All Rts		Table of Contents for Reports A,B,C,D,E,F,G		Report 00: Intro to Lazyman-Travis 4000-001
A-B	4000-001	2019-06-02	Travis Pass-Colorado Pass-Nelson	Joslin, Powell, Bishop	Report B: 4000-001 North
A	647-NS16	2020-05-11	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS15	2020-05-11	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS13	2020-05-11	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS12	2020-05-16	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS10	2020-05-16	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS09	2020-05-16	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS08	2020-05-11	Nelson Gul.	Ingman	Report F: 647-NS: 08-10,12,13,15-16
A	647-NS06	2020-05-11	Nelson Gul.	Joslin	Report G: 647-NS: 01, 02, 04, 06
A	647-NS04	2020-05-11	Nelson Gul.	Joslin	Report G: 647-NS: 01, 02, 04, 06
A	647-NS02	2020-05-11	Nelson Gul.	Joslin	Report G: 647-NS: 01, 02, 04, 06
A	647-NS01	2020-05-11	Nelson Gul.	Joslin	Report G: 647-NS: 01, 02, 04, 06
A	723-NS01, NS04	2020-05-10	Grizzly Gul.	Joslin	Report: 723-NS01; 723-NS04
A	4000-NS03 - 06	2020-05-04	Colorado Gulch -"China Gulch"	Joslin	Report E: 4000-NS: 03, 05-06
B	I: "Feature Road"	2020-02-21	Travis Cr N.Fk.-illegal access to IRA	Joslin, Powell, Ferry	Notice.Supplem.Authority.FILED.EXHIBIT.1
B	4000-001	2020-05-04	Travis Cr. N.Fk. - Colorado Pass	Joslin	Report A: 4000-001 South
B	4000-NS01	2020-04-28	Travis Cr.	Joslin	Report C: 4000-NS01
B	4000-NS04	2020-04-30	Travis Cr. N.Fk	Joslin	Report D: 4000-NS04
B	4000-NS08	2020-05-04	Travis Cr. N.Fk.	Joslin	Report E: 4000-NS: 03, 05-06, **08**-12

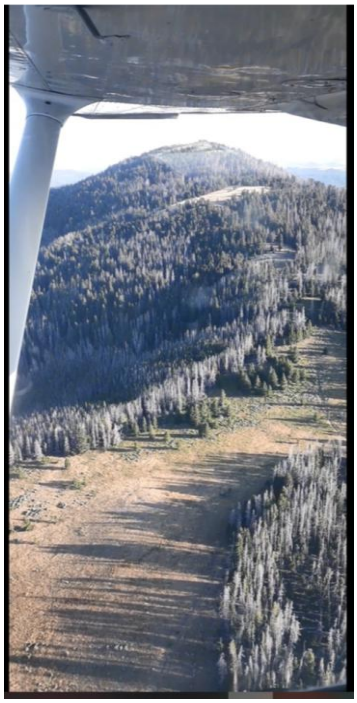
B	4000-NS09 & NS10	2020-05-04	Travis Cr. N.Fk.	Joslin	Report E: 4000-NS: 03, 05-06, **08-**12
B-D	4000-NS11	2020-04-28	Travis Cr.-Colorado Gul.	Joslin	Report E: 4000-NS: 03, 05-06, **08-**12
B	4000-NS12	2020-05-16	Travis Cr.	Joslin	Report E: 4000-NS: 03, 05-06, 08-**12**
B-C	T587-1	2020-05-08	Blackhall Meadows-Travis-Beaver	Platt, Orsello	T5781 Blackhall
B	Chessman Ditch- Travis Creek Subunit B	2023-06-04	"E side: Chessman Ditch to north" (aspirational mtn bike trail) in Travis Cr.	Joslin, Powell, Milburn Westfall, Ferry	Chessman Ditch- 6-4-2023
B	I: Blackhall Mtn Bike Trail construction	2023-07-19	Blackhall 46.491190 by -112.172742 Nad 83	Powell, Ingman, Platt	Blackhall Bike Damage Report
B	I: Trapped dog	2016-10-30	Little Corral Gul-Travis Cr	Kent	Domestic dog trap incident 10302016
C	4177-Colorado Mtn Tr	2020-05-16	Beaver Cr-Colorado Guch	Westfall	4177-Colorado Mtn Tr
C	299-NS05	2020-05-17	Beaver Cr	Westfall	299-Series report
C	299-C1	2020-05-17	Beaver Cr	Westfall	299-Series report
C	299-U007	2020-05-17	Beaver Cr	Westfall	299-Series report
C	1880-NS01	2020-05-07	Moose Cr	Ingman	1880 Series - Moose Cr.
C	1880-NS02	2020-05-07	Moose Cr	Ingman	1880 Series - Moose Cr.
C	1880-NS03	2020-05-07	Moose Cr	Ingman	1880 Series - Moose Cr.
C	1813	2020-05-02	Lazyman Cr	Sovner	1813 Series - Lazyman Cr.
C	Telegraph Trail	2017-05-22	Colorado Mtn	Powell, Joslin, Barkley	2017-05-22 Colorado Mtn-Telegraph Trail
C	Lazyman Cr - VP Parks	2023-05-21	Lazyman Cr to VP Park to Tenmile Rd * Lazyman-VP Parks Field Observations 5-21-23	Milburn, Powell, Joslin, Westfall, Ingman	Lazyman-VP Parks Report Field Obs 5/21/23
C	I: 299 - in this vicinity;	2025-11-11	Beaver Cr- discover mot.trail clearing	Westfall	fs_5300_16Statement_Westfall_20251118/ FS299-B1_Nov25Westfall
D	4782-01	2020-04-28	Colorado G.	Powell	4782-000 Series N. Lazyman IRA
D	4782-02	2020-04-28	Colorado G.	Powell	4782-000 Series N. Lazyman IRA
D	4782-03	2020-04-28	Colorado G.	Powell	4782-000 Series N. Lazyman IRA
D	I: Illegal Construction Bike/Hike Trails	2022-09-24 2022-10-09	Lazyman (Landmark), Willow Cr	Powell, Westfall, Joslin, JJolliff, AJolliff	Willow Cr Bike Trails Report 9-24 & 10-9 2022; Complaint-Illegal Trails Lazyman IRA-Willow Cr 2022-11-4; 2022-11-23 FS Response to HHAA Official Public Complaint
D	A: Willow Cr Trail Signs Install	2023-07-15	Lazyman(Landmark), Willow Cr	FS personnel, HHAA	Willow Trails Signs Installation
D	I: Willow Motorized Use	2025-09-18	Willow Cr - illegal side-by-side use	Powell	Law Enforcement Report sent to Helena Ranger District
D	I: Ebike trail clearing	2026-01-11	Lazyman (Landmark), Willow Cr	Powell	Willow Incident e-bike clearing 2026-01-11
E	Blackhall – Colorado Gulch-L.Buffalo Gulch	2023-07-19	Colorado Gulch	Ingman, Powell, Ferry, Milburn	Hydrology Rpt 7-19-2023 Blkhl-Lzymn, GIngman IRA Meeting notes 8/2/2023

E	I: Proposed Spring & Access Development	2025-12	Upper Colorado Gulch - discover illegal motorized entry to IRA	Powell	Stock Tank Spring Development
E	I: Illegal Hunting Camp	2009-2011	Upper Colorado Gul-Blackhall	Powell, Joslin	Illeg Trails-Hunters-Blackhall/ Camp Remove-ThanksLtr to FS
C	Aerial Survey: 4/2019	2019-04-03	Lazyman & Jericho bdry-bulldozer	Powell	FLIGHT REPORT 2019-04-3 Lazyman bull dozer
B-C-D	Aerial Survey: 8/2019	2019-08-29	Blackhall Meadows-MP4 file	Powell	FLIGHT REPORT 2019-08-29 Lazyman MP4
C	Aerial Survey: 1/2022	2022-01-20	Lazyman-Jericho; Logging Chessman; burning Travis	Powell	FLIGHT REPORT 2022-01-20 Lazyman-Jericho
C-D-E	Aerial Survey: 3/01/2026	2026-03-01	Lazyman-Black Mountain; Nevada Mtn; Electric Peak IRAs	Powell, Ingman	Flight Report 2026-03-01 Lzmn Jcho Nvda
C-D-E	Aerial Survey: 3/29/2026	2026-03-29	Lazyman-Black Mountain; Nevada Mtn; Electric Peak IRAs	Powell, Ingman	Flight Report 2026-03-29 Nvda Jcho Lzmn
Subunit	**Route# [1]/Monitoring Area/Incident**	**Date**	**Location**	**Surveyors**	**Info**

[1] Forest Service# for aspirational routes that the FS wanted to use to access sale units planned within the Tenmile-South Helena Project Area. Most routes either do not exist or have been naturally reclaimed over decades. 38 areas were quantified in litigation Case 9:19-cv-00047-DLC Document 112, where the District Court judge ordered HHAA to supplement the record with photographic quantification of status of routes. It was determined that alleged (non)routes could not be used for timber harvest in the Lazyman IRA.

Aerial Overflights -

Five Lazyman IRA overflights were conducted on April 3, 2019, August 29, 2019, January 20, 2022, March 1, 2026, and March 29, 2026 (Fig. 8. and 9). Flight objectives were to make general observations as well as document incursions into the IRA or other activity. Substantial information resulted from these flights. For example, on April 3, 2019 pilot Doug Powell reported:



Figures 9 and 10. *Over flight of Blackhall Meadows and Colorado Mountain parklands, August 28, 2019.*

"Flew the boundaries of Jericho and Lazyman IRA today. No equipment tracks leading into the IRA's. No equipment tracks on the south side of Lazyman IRA. On the northeast side of the Lazy-man IRA there are three bulldozers, two skid type machines and two forwarders.
One bulldozer was near the mount Helena ridge, on the old Alm place. Two forwarders and one bulldozer are on private land between Colorado and Nelson Gulch.

Another bulldozer is at the south end of Nelson Gulch, near the Grizzly Gulch Park City area, may be mining equipment. Did not see any activity on the east side or north side of Jericho, (flew the Continental Divide Trail from McDonald Pass to Whiskey creek), missed the Bullion parks pass on the south side of Jericho."

On August 29, 2019, pilot Doug Powell surveyed the Blackhall Meadows and Colorado Mtn portions of the Lazyman IRA, observing deer and noting vegetation conditions. An MP4 video was taken, with the flight's goal to take photos of the pole sale in the IRA east of Blackhall Meadows. The proposed sale targeted the only green trees in the area.

On August 24, 2022, Powell observed a red tractor loader above private property within the IRA in Moose Creek and reported it to the Helena Ranger District. The Helena Ranger District compelled its owner to remove the tractor.

On January 20, 2022, logging activity along Chessman Reservoir as well as burning in the N. Fk. Travis Creek-Blackhall Meadows area was noted (Fig. 11).

Just to the east of the Inventoried Roadless Area, previous logging of the riparian zone around Chessman Reservoir (Fig. 12) seriously disrupted the spring nursery area that elk were known to use.

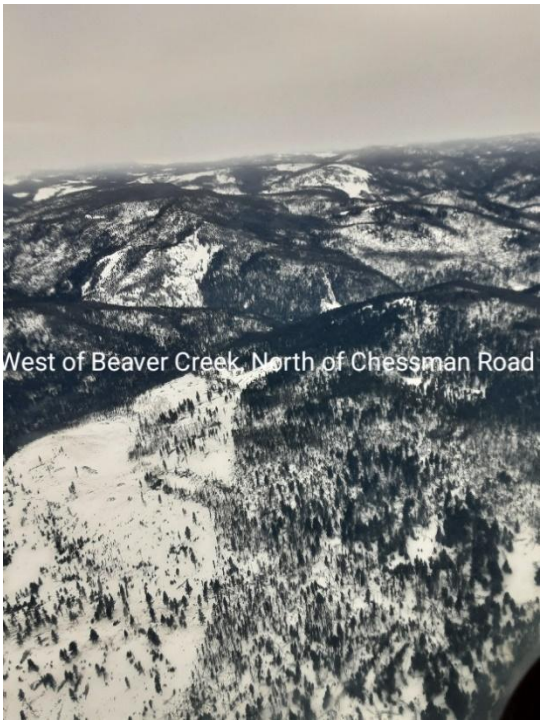


Figure 11. January 20, 2022 Aerial Survey of southern Lazyman IRA in the Beaver Cr-Travis Cr area.

Figure 12. Previous logging along Chessman Reservoir (Aug 2, 2016) impacted wildlife habitat known for its flying squirrels and elk nursery area – immediately adjacent to the West Beaver Creek portion of the Lazyman IRA.

During March 1 and 29, 2026, flights over the Lazyman IRA conducted by pilot Doug Powell and photographer Gary Ingman, observed no motorized vehicle tracks in the placer mining area in Colorado

Gulch, Moose Creek, or the area around the water tanks west of the top of Colorado Gulch. However, during the March 29 flight over Colorado Gulch, where the formerly identified e-bike trail through BLM land to private land had been documented, it was observed that the trail forked leading to two different private properties, indicating that e-bike access may be emanating from more than one access point.

Field Surveys - Lazyman Inventoried Roadless Area – 5 Subunits

Dozens of field reports photographically documenting conditions along monitoring routes comprise the current status of the Lazyman Inventoried Roadless Area. In addition, when incidents of unauthorized or illegal activity were noted within a Subunit, an Incident Report was filed.

Table 2 (Lazyman Inventoried Roadless Area – Monitoring and Incident Reports) categorizes all reports according to the five Subunits within the IRA. All field reports are listed below and can be cross-referenced from Table 2 and accessed via the linked Subunit files in Google Drive. Report titles that begin with numbers, such as "723 Series Report", are referencing aspirational roads that the Forest Service intended to use to access the Lazyman IRA for "vegetation manipulation."

The monitoring process that the IRA monitoring committee devised is described in two sets of committee meeting minutes in Subunit A, although the process applied to all reports.

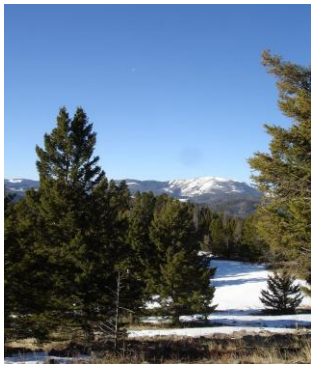
At least 43 individual field surveys (including Incident Reports) were conducted within the Lazyman IRA between 2019 and 2026 by volunteers Doug Powell, Camie Westfall, Gary Ingman, Dennis Milburn, Steve Platt, Bill Orsello, Paul Ferry, Nick Sovner, and Gayle Joslin. Reports for each field survey are listed in Table 2 and referenced to the appropriate Subunit. In addition to field surveys, ten different Incident Reports (nine illegal actions or response to those actions and one concerning event) were documented and are noted in Table 2 (gray background). "Incidents" generally involved documentation of illegal activity or an "Action" follow-up effort to correct the situation.

The large number of Field Surveys for Lazyman stems from the fact that HHAA legally challenged the Tenmile-South Helena Vegetation Manipulation Project specifically because the Project intended to manipulate vegetation inside the Lazyman Inventoried Roadless Area using "roads" that were aspirational rather than actual. HHAA meticulously documented the on-the-ground status of said "roads" and thus built an extensive record of the condition of the Lazyman IRA.

Summaries of Subunits: Narrative descriptions and select photos recorded for each of the five Subunits are summarized from associated aerial and individual field surveys. Completed field data sheets, additional photographs, narratives, and maps occur in each field report and are linked to Subunit Field Reports in HHAA's Google Drive.

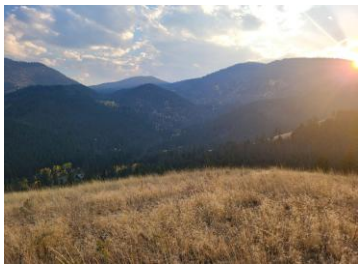
Please click links to access Subunits A through E Summaries displaying 148 photos.

Subunit A: Northeast Area - East Fork of Colorado Gulch, Nelson Gulch, Grizzly Gulch



Subunit B: East – Travis Cr

Subunit C: South & West – Beaver, Tenmile, Moose, Lazyman



Subunit D: Northwest – Willow, West Fork Colorado Gulch

Subunit E: Center – Upper West Fork Colorado

Individual Field Monitoring Reports

Individual field monitoring reports and incident reports for each subunit are listed below.

A Subunit field reports
Report 00 describes how Reports A-G mesh Subunits A and B.
Report B – 4000-001 North
Report F – 4000-001 Spurs 647-NS
Report G – 647 roads detached
723-Series

B Subunit field reports
Report A – 4000-001 south
Report C – 4000-NS01
Report D – 4000-NS04
Report E – 4000 South Spurs 03, 05, 06, 08, 09
Chessman Ditch- 6-4-2023 E side Lazyman
T578-1 Blackhall-sp
Blackhall Bike Damage Report
Feature Road –
Notice.Supplemental.Authority.Filed.Exhibit

C Subunit field reports
299-Series
1813 Lazyman May 2 2020
1880 Moose Creek-NS01, NS02, NS03
Colorado-Telegraph Trail 5-22-2017
Colorado Mtn OHV use on 299-B1 – email
Lazyman-VP Parks Report Field Obs 5-21-2023
fs_5300_16Statement_Westfall_20251118/
FS299-B1_Nov25Westfall

D Subunit field reports
4782 Series Report 001, 002, 003 N Lazyman
Willow Cr Bike Trails Report 9-24 & 10-9-2022
Willow Cr Trail Signs Installation
Willow Incident e-bike clearing 2026-01-11
Complaint-Illegal Trails IRA-WillowCr2022
Resp to HHAA Trails OfficialComplaint-KBushnell
Illegal Trails in IRA-cover 10-17-2022 EPlatt

E Subunit field reports
Confidential-Illegal Trails Blkhall
CampRemoval ThxPosewitzToAvey
Hydrology 7-19-23 Blackhall-Lazyman_GI
Stock Tank Spring Development-dp
2023-08-02 IRA Meeting Lazyman & Nevada

F – FLIGHTS LAZYMAN
Flight Report 2019-04-3 Lazyman bull dozer
Flight Report 2019-08-29 Lazyman MP4
Flight Report 2022-01-20 Lazyman-Jericho
Flight Report 2026-03-01 Lzmn Jcho Nvda
Flight Report 2026-03-29 Nvda Jcho Lzmn

Summary of Illegal roads and trails

During aerial reconnaissance, HHAA observed heavy equipment on public land behind private property in Moose Creek and associated illegal road construction was documented. An extensive network of trails being used by both hikers and e-bikers was documented in the Willow Creek area in the north portion of the Lazyman IRA (Subunit D, Figure D12), and then two years later, subsequent violations were also documented in the same area. Clearing of non-motorized trails to accommodate ATVs and side-by-sides was documented in the Beaver Creek area. In the Blackhall area, illegal construction of a banked mountain bike trail was photographed. New access for grazing infrastructure was discovered in the Willow Creek-Lazyman Creek area. In the Nelson Gulch drainage several trails leading from private property into the IRA were recorded as well as a two-track that crossed wet areas where the builder had dumped gravel to facilitate motorized travel. The Helena Ranger District was notified in all instances. In some cases, the Helena Ranger District undertook efforts to correct the situation. Where illegally

constructed and/or maintained trails and two-tracks occur, enforcement action and restoration or obliteration measures are needed.

Tabulation of person hours, mileage, level of effort

More than 650 person-hours of volunteer time and over 1,300 vehicle miles were driven conducting the Lazyman IRA monitoring effort from 2019 to 2026 (Appendix I). All monitoring was conducted during single day trips. Time spent developing this report is not included, which tallied 200+ hours.

CONCLUSIONS AND SCORING

The Lazyman Inventoried Roadless Area requires immediate agency and community attention. The Lazyman IRA scores relatively low compared to IRA's further from populated areas, such as the Nevada Mountain IRA. And yet, the Lazyman IRA has values that go well beyond its boundaries and are particularly important to the people of Montana, precisely because of the area's proximity to Helena. However, the Lazyman IRA is at a *critical* point because human use and intrusions are substantially expanding.

The IRA's very special qualities are being threatened as a result of ignorance and short-sighted disrespect. Vigilant oversight and agency enforcement, as well as public education about roadless area contributions to the healthy functioning of natural systems and community values, is essential. Particularly salient is the fact that the Lazyman IRA is a critical stepping stone along the Continental Divide for direct wildlife movement as well as generational genetic flow for rare species.

Aerial Overflight -

This assessment category is not scored.

Five overflights of the Lazyman IRA were conducted April 3, 2019; August 29, 2019; January 20, 2022; March 1, 2026; March 29, 2026; and focused on general IRA conditions, but with an emphasis on identifying boundary violations.

The flights documented ground conditions, tracks of motorized vehicles in closed areas, and heavy equipment behind the Lazyman IRA boundary. Additional flights are warranted to monitor boundary integrity of the IRA, as well as unauthorized activity in the interior of the IRA.

Boundary Condition –

Boundary signage does not exist or needs improvement at all public access points. In general, the boundary condition and adjacent areas posed a major problem to the integrity of the IRA. Actions that would benefit the area include:

- Clearly sign and effectively gate all IRA access points to educate the public about Inventoried Roadless Area benefits as well as restrictions on unauthorized uses.
- The parking area on the Travis Creek Road leading to Blackhall Meadows needs more explanatory and permanent signage because new user-created trails are encroaching on the boundary from mechanized and motorized uses, including e-bikes.
- The parking area at the Beaver Creek (299-B1) hiking access to Colorado Mountain needs more explanatory and permanent signage, and a better gate.
- Gate and sign maintenance is regularly needed at Lazyman Gulch to avert illegal motorized camping and motorized use.
- Signage along the boundary in Nelson Gulch would dissuade two-track use into the IRA.
- Informational signage as well as adjacent landowner education is needed to avert trail building and use by mountain bikers on the north end of the IRA in Willow Creek.
- Full restoration of the mountain side damaged by the "Feature Road" to its original contour by removing the roadbed, reseeding with vegetation native to that site, and signing to prevent motorized use would avert unauthorized access from the county road that did not exist prior to construction of the "Feature Road."
- Travel plan enforcement must be beefed up.
- Require adjacent private landowners to remove private property from within the IRA and enforce the no motorized rule where private encroachment is occurring on public lands.
- Adjacent to private lands, visibly mark the IRA boundary with signs identifying it as an IRA and include applicable regulations.
- Logging activity has encroached on most sides of the IRA leading to boundary impacts including along Grizzly Gulch, Travis Creek, Beaver Creek, and Lazyman Creek.
- The original IRA boundary should be identified and marked on the ground as well as digitally. As harvest units slowly regenerate, a more natural and functional IRA boundary will emerge and wildlife security will improve.
- Mining activity must be investigated and mining equipment removed from the area.

The level of boundary intrusions relative to the size of the Lazyman IRA area has led to a lower score for the Lazyman IRA than it otherwise would be.

On a positive note, as a result of HHAA monitoring:

- a steel gate has been installed in Lazyman Gulch next to the Tenmile picnic area,
- signs have been erected in the Willow Creek area to dissuade use by e-bikers,
- educational materials have been distributed to landowners in Willow Creek and Colorado Gulch,
- an illegal hunting camp was reported and some of the materials and trash has been removed.

Figure 13. Steel gate installed at entrance to Lazyman Creek.

Score

70% out of a possible 100%, with a declining trend. There is growing concern that management agencies are not getting ahead of the curve from human pressures. Educational outreach fosters an appreciation for management restrictions that benefit ecosystem/landscape function. Solutions to problems are never easy, but they can be simple if they are consistently applied. Public education without enforcement doesn't work. Efforts should be made to reach out to companies that promote apps to facilitate access to public lands such as OnX, TrailForks, Avenza with educational information that could be included in the app. Clearly, a sensitivity to and understanding of management restrictions is necessary.

Overall, the boundary condition was somewhat tattered but moderately intact. There are problems that need correction. The documented ATV and side-by-side intrusions from private lands in Willow Creek and Colorado Gulch, and from Beaver Creek to Colorado Mtn and Blackhall Meadows – through to Travis Creek, were detractors from a higher score. We also have concerns about motorized intrusions into the IRA from special use permits holders. Their needs have, in the past, been accommodated with non-motorized access. Significant user created trails in the Willow Creek portion of the Lazyman IRA need obliteration, immediate attention and enforcement since violations continue despite newly installed signs. Broadly speaking, the frequency of boundary violations is significant because of inadequate signing. The Forest Service must take a more comprehensive approach to signage across the forest as a whole so the public becomes familiar with the management intent.

Hydrology -

The Lazyman Inventoried Roadless Area is an important snowpack generating area that contributes to streamflows in Prickly Pear and Tenmile creeks, and supports multiple beneficial water uses ranging from fisheries and associated aquatic life, municipal drinking water supplies, and irrigation in the greater Helena Valley. Tenmile Creek is fed by tributaries draining the west and north sides of Lazyman IRA and provides more than 50 percent of Helena's municipal drinking water. Prickly Pear Creek drains the east side of the IRA and is an important source of groundwater recharge to the Lake Helena aquifer, which supports public and private domestic and irrigation water wells. It also supports coldwater fisheries, irrigation and other beneficial water uses.

Tenmile Creek has a number of documented water quality impairments that interfere with its designated beneficial water uses, including drinking water, fisheries and aquatic life, and agriculture. These impacts were noted during surveys of the IRA conducted for this assessment and were referenced in discussions earlier in this report. These include heavy metals stemming from historical mining and smelting activities, hydromodification and dewatering, and sediment/siltation. The Upper Tenmile Creek Mining Area is a designated federal Superfund site (cleanup Record of Decision signed in September 2008). The aquatic health of the upper Tenmile Creek drainage was assessed for impacts from abandoned mines and municipal water diversions in 2008 (Skaar and McGuire, 2008). Additionally, a detailed hydrologic and watershed analysis of the Tenmile ecosystem was completed by the Helena National Forest in 2008 (USDA Forest Service, 2008).

Prickly Pear Creek suffers from similar water quality impairments as Tenmile Creek, including metals contamination, dewatering/flow modification, sedimentation, and nutrient loading.

Snowpack and water supply trends for the Lazyman IRA can be inferred from the Frohner Meadows SNOTEL monitoring station located at 6520 feet elevation southeast of Rimini and slightly outside of the IRA boundary. Historical and current data describing precipitation, snow depth, snow water equivalent, and air temperature are shown in Figures 16-19 below. While precipitation in Water Year 2026 has increased over the last month from median levels to near maximum levels for the time of year (Figure 16), snow depth and snow water equivalent are currently trending well below the median (50th percentile) value, based on more than 20 years of continuous record keeping (Figures 17 and 18). At the same time, air temperatures (Figure 19) have generally been above average, which likely is a factor detracting from water storage in the form of snow. The snow water equivalent projection for the remainder of Water Year 2026 (through September 30, 2026) is not optimistic about fully recovering from the current low snowpack (Figure 20). Low snowpack would have a negative effect on Lazyman IRA streamflows, aquatic life, riparian health, and the ability of streams to support downstream water uses including the Helena municipal drinking water supply.

Excellent functioning condition was noted in some tributary streams, including Moose Creek and the tributary of Beaver Creek draining from Colorado-Black mountain area. Although a relatively small creek, Moose Creek, as well as the tributary of Beaver Creek, both originate within the IRA and likely produce

the highest quality water flowing into the Tenmile municipal water supply because there is no mining activity in these drainages. Water intakes to the municipal system are designed to try to avoid mine drainage which is substantial in the Tenmile watershed, where more than 150 active and abandoned mines occur (Super Fund Site Profile).

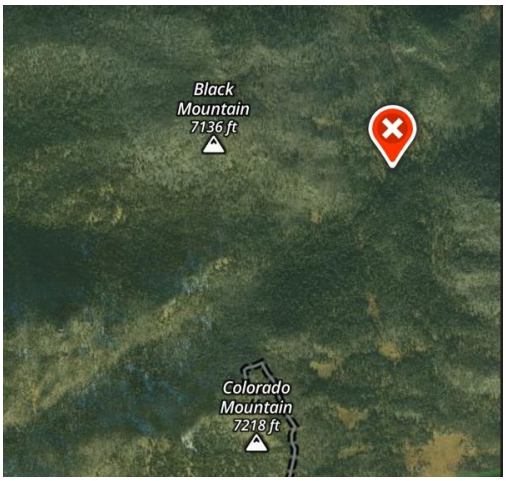
Climate related hydrologic impacts are trending downward and are negatively affecting ecological health including the municipal and landscape water supply, coldwater fisheries and aquatic insects, while threatening downstream irrigation and other water supplies needs to Tenmile Creek and Prickly Pear Creek.

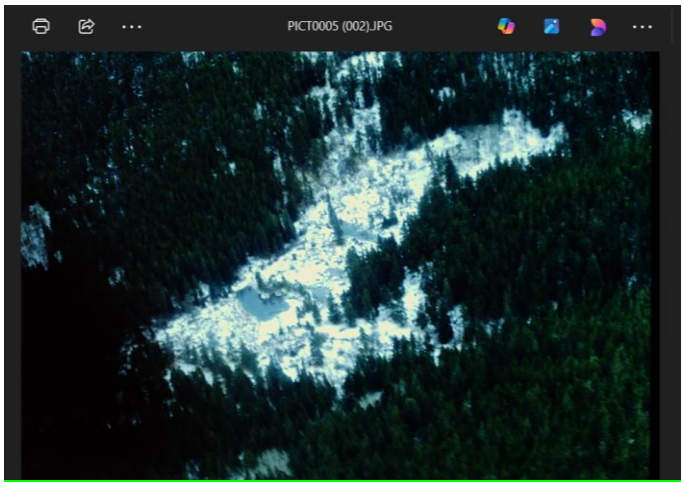
Climate related hydrologic impacts (low snowpack, especially in Water Year 2023-2026) has the likely potential to negatively affect coldwater fisheries and threaten downstream water uses in Tenmile, Moose, Prickly Pear, and Travis creeks. While remnant native westslope cutthroat populations occur within the area, existing stressors and impacts do not bode well for their sustainability (need a reference).

-Evidence of hydromodification (See Subunit Report E, Fig. E05-E07) was noted in Colorado Gulch, some of which has been recent due to mining activity.

-Fire mitigation activities have had an effect on basin hydrology (timber removal, roads, sedimentation, proliferation of weeds, etc.).

-Beavers, whose activities sustain and raise ground water, were present within the last 50 years (Figures 14 and 15), but have been trapped out.





Figures 14 and 15. Map and aerial photo of beaver ponds in the upper west fork of Colorado Gulch.

Score

65% out of a possible 100%, with a downward trend, largely from natural causes, however mining activity continues to be problematic.

Factors detracting from a higher score were 1) drought, low snowpack, record low streamflows, and increasing ambient temperatures, 2) cattle trespass in riparian areas on Colorado Creek, Blackhall Meadows, 3) noxious weeds, and 4) small miner activities. Snowpack and adequate streamflows are important for wildlife, fisheries, downstream irrigation, and municipal water. We can't readily address declining precipitation, but we can protect riparian areas and maintain shading for cooler temps. This is a critical issue of concern. Although important for wildlife and municipal water supply, hydrology is getting worse.

Beavers have been entirely removed from this area; however, photographs taken by an HHAA member of beaver ponds within the IRA in the 1970s document the presence of beaver in various areas. With a ban on trapping in this area, HHAA recommends the reintroduction of beavers into their native habitats within the IRA to improve ground water levels, and promote riparian renovation, water retention, and stream flows. All of which would improve the ecological health of the watershed while improving water quality for the Helena municipal water supply.

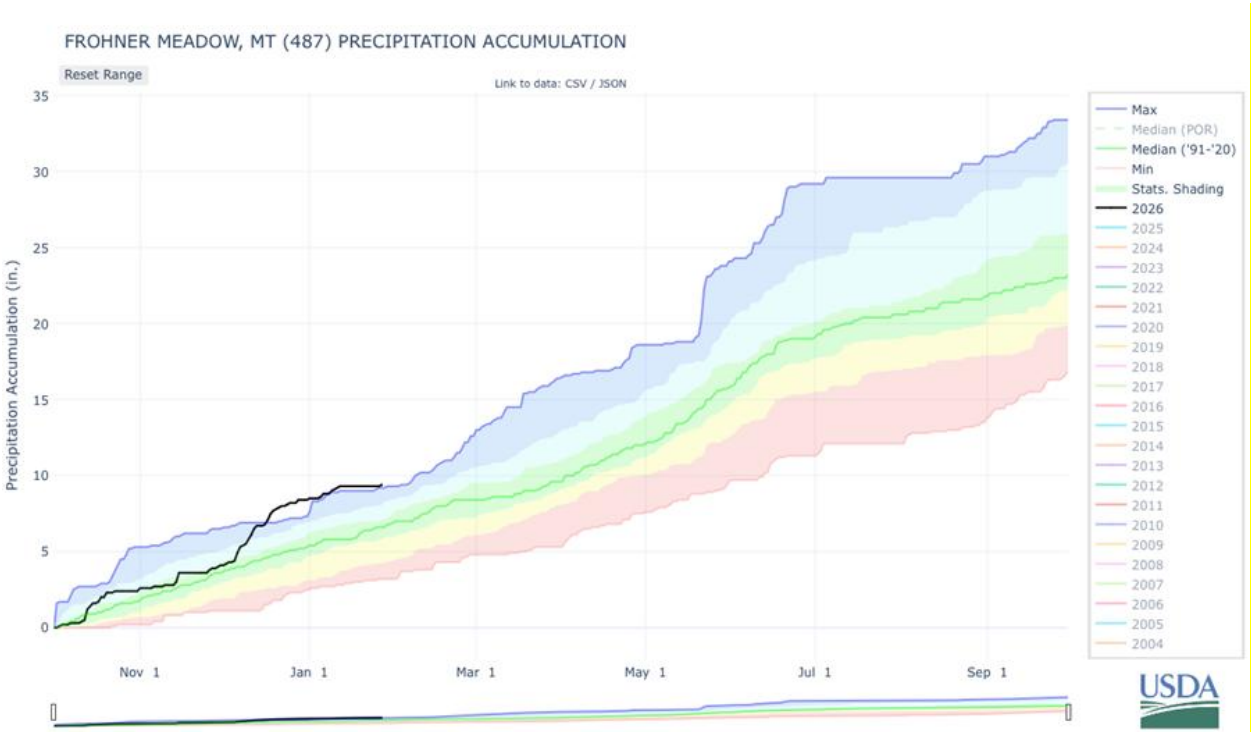


Figure 16. Frohner Meadow, MT Precipitation Accumulation

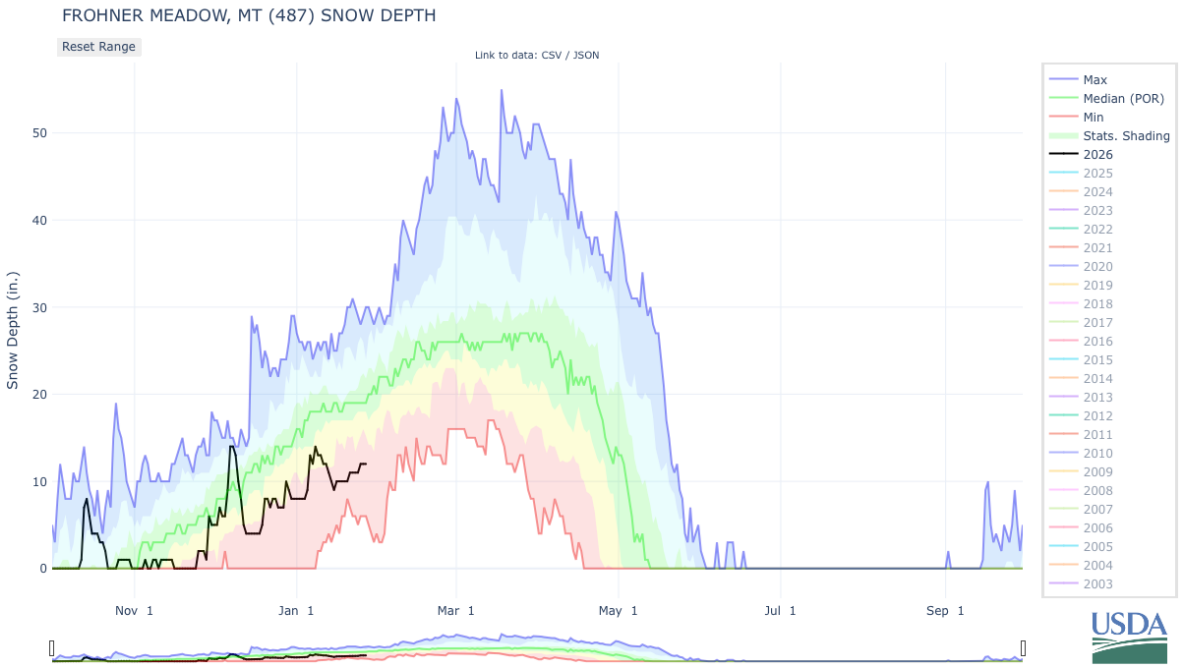


Figure 17. Frohner Meadow, MT Snow Depth

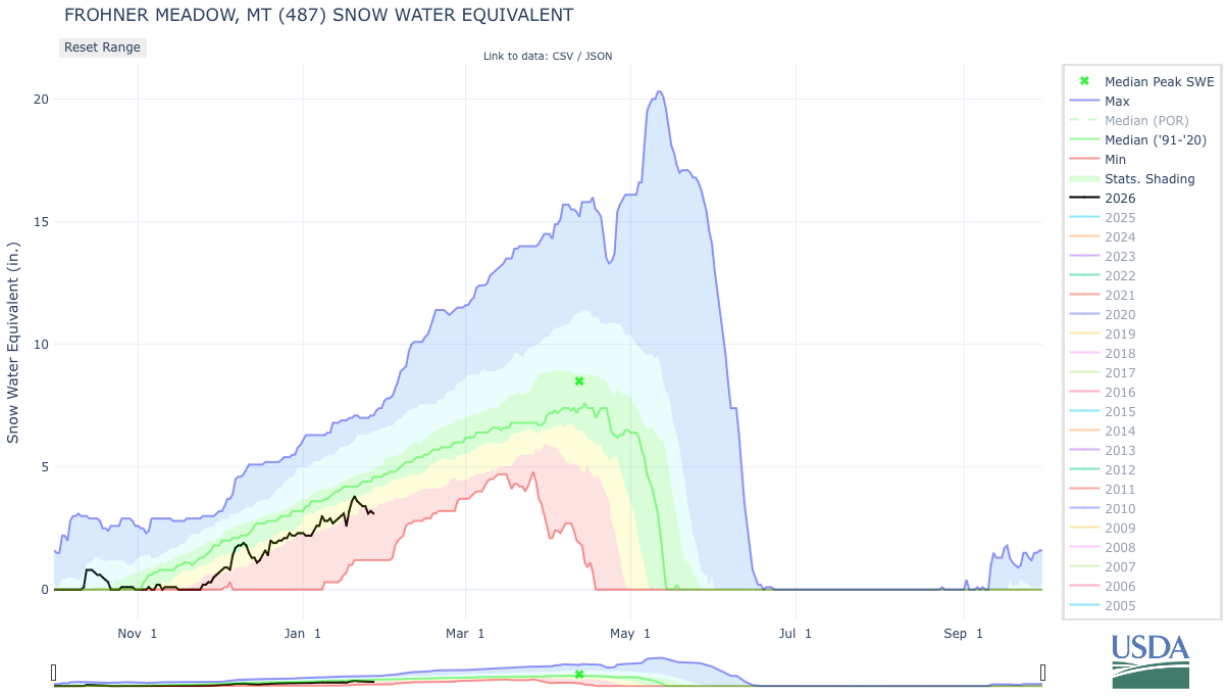


Figure 18. Frohner Meadow, MT Snow Water Equivalent

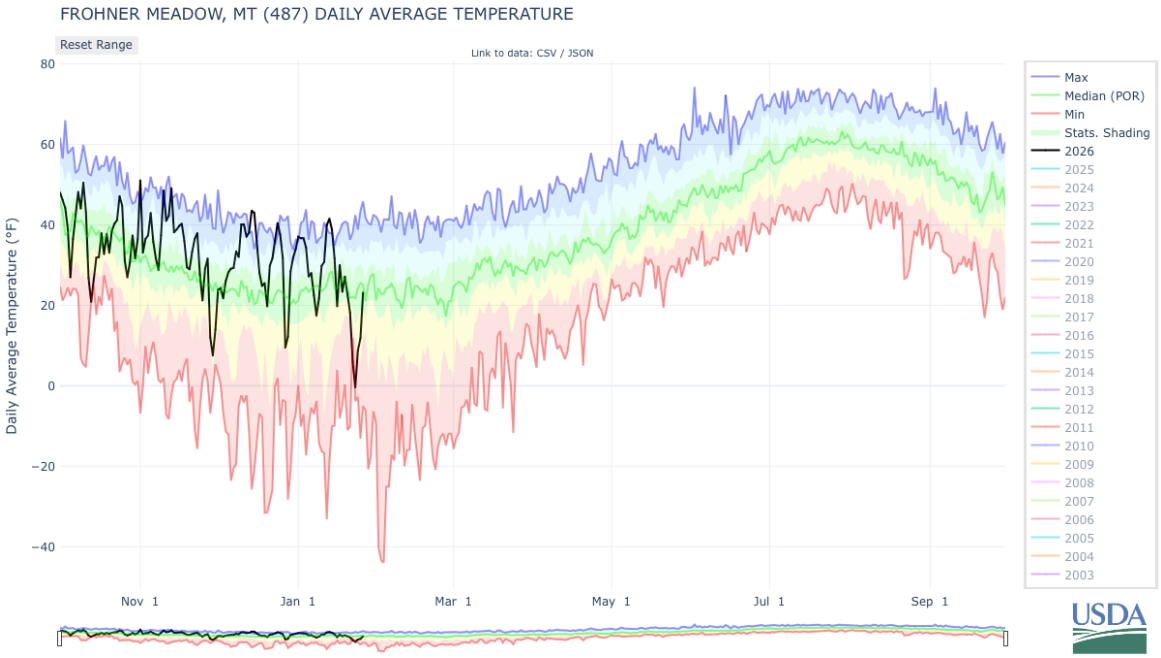


Figure 19. Frohner Meadow, MT Daily Average Temperature

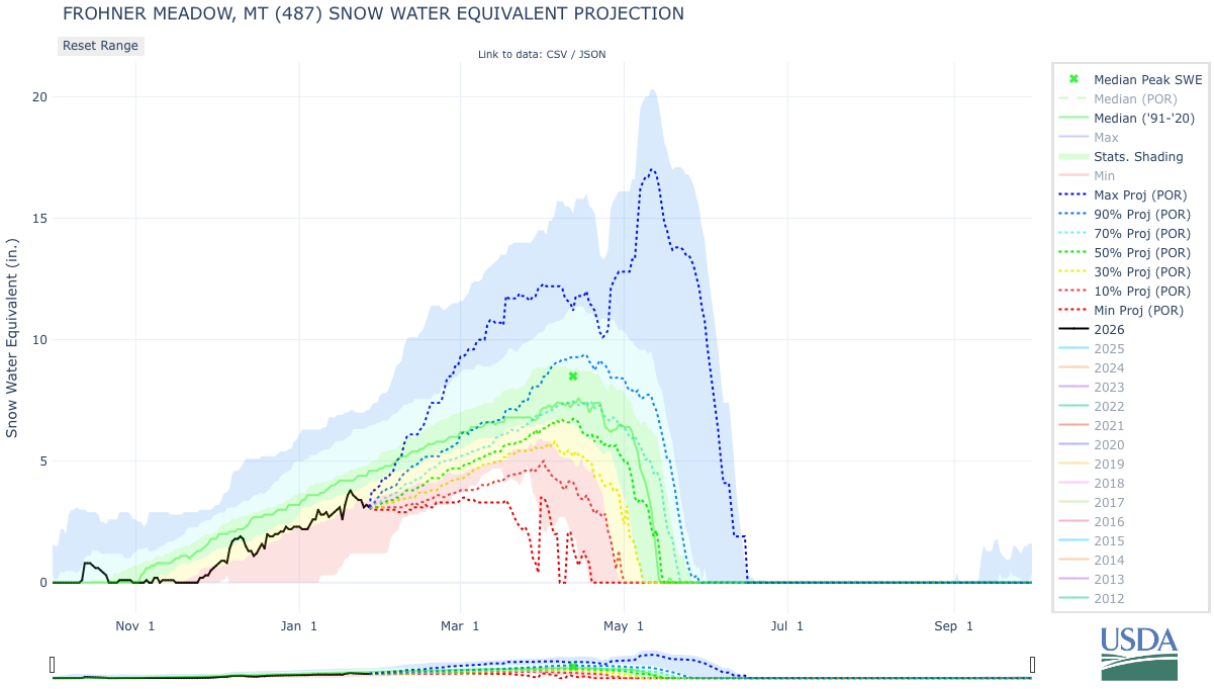


Figure 20. Frohner Meadow, MT Snow water equivalent projection

Wildlife -

Wildlife in the Lazyman Gulch IRA shows good diversity. During this survey, wildlife sightings and photos of tracks were documented by Helena Hunters and Anglers, including wolf, lynx, wolverine, grizzly bear [Steve's photo], black bear, mountain lion, coyote, fox, elk, moose, mule and white-tailed deer, dusky, ruffed, and spruce grouse.

Predators are well established and big game is apparently well distributed, reasonably abundant, and shows reasonable age structure. Recent winter elk counts by Montana Fish, Wildlife and Parks in the Deerlodge Elk Management Unit show an elk population that is at or above objective, although bull numbers are relatively low. The security areas provided by the Lazyman IRA contribute to survival of bull and cow elk.

Figure 21. Tracks of two adult and two subadult wolves in the northern portion of the IRA.

The Lazyman IRA is a refuge for wildlife in proximity to a large human population center. This IRA figures prominently in the main Continental Divide linkage corridor, and acts as a stepping stone between the Divide and the Elkhorn Mountains to the east, and serves as an IRA connector between the Northern Continental Divide Ecosystem and the Greater Yellowstone Ecosystem.

Trapping activity documented in the Travis Creek drainage may pose a threat to some listed wildlife species, particularly lynx and wolverine.

Figure 22 . Grizzly bear track along the southern portion of the Lazyman IRA. Photo by Steve Platt taken while hunting for ruffed grouse.

In order to capture wildlife occurrence throughout the IRA, motion sensor trail cameras may be deployed, although none are currently in use in the Lazyman IRA.

Score

90% out of a possible 100%, with a declining trend. This IRA's value is increasingly important for wildlife for a variety of reasons, because it serves as a haven against anthropogenic threats, but there is little escape from climatological impacts. Wildlife habitat is being degraded which is leading to an imminent downward trend for wildlife.

Conclusions: There is potential right now to reverse a portion of this downward trend. Beaver could be reestablished, and rare species including lynx, wolverine, grizzly bear, and wolves do find sanctuary in this and adjacent Inventoried Roadless Areas.

Wildlife security habitat is moderate to good, most native species are present and overall biodiversity is good, however observations are declining. Elk numbers are high but bull:cow ratios are low. This is a hunting management issue. Mule deer populations have been depressed possibly due to population cycling. Trapping is a threat to lynx and wolverine.

Plants/Vegetation -

Most of the forest is in mid- to late-seral stage. A general "blight" is widespread stemming from beetle kills, bud worm, blister rust, drought impacts, etc. The forest is slowly being replaced and moving from late- to early-seral stage in many areas. Noxious weeds are fairly widespread in livestock grazed areas. Impacts to riparian areas associated with noxious weeds were documented along most private land boundaries and where motorized use has occurred either illegally such as in Lazyman Creek, or in cutting units adjacent to the IRA (Travis Cr., Beaver Cr., Lazyman Cr.).

Summary of conditions resulting from a lack of natural fire regimes:

- 1. An important natural ecological process, wildfire, has been largely excluded from the IRA for at least the past 80 years. This lack of the natural fire regime has had some impacts on the NRV in forest composition for structure, age and species, i.e.:
    - a. less Non-forest - mostly grassland impacted as conifers expand their range
    - b. expansion of Douglas fir and Lodgepole pine, loss of Ponderosa pine, Whitebark pine dominated areas
    - c. higher density of canopy closure
    - d. Little very young stage (seedling/sapling age class) in the IRAs
    - e. Young and very young size class trees become dominant in older stands.

- 2. The NRV is key to the proper functioning of a fire-adapted ecosystem by being resistant to impacts from disturbance, such as wildfire, insect and disease infestations, as well as resilient from those impacts when they do occur.

- 3. R1-VMap inventory (remote sensing) identifies the dominant size class by the amount of area occupied for a stand of trees. As succession proceeds, younger, smaller size classes can expand into existing larger size classes and become the dominant size class by number of trees of the area. The large trees may still be there but are "hidden" by the more prevalent smaller trees. This may account for the perceived lack of large/very large size classes and a relative abundance of medium, and smaller size classes and a relative abundance of medium, and smaller size classes. This is why the medium and large/very large tree size classes are combined in much of the following discussion.

- 4. Even with little to no wildfire burned acreage in the past 80 years in the Divide GA, there is a significant lack of the mature (medium size class) and old/very old (large/very large tree size class) component in the forest ecosystem. Likely a combination of factors such as timber harvest, insect epidemic and, perhaps, disease are the causes.

- 5. The GA has an abundance of very young and young age groups. Likely causes are timber harvest, insect epidemic.

- 6. The IRA has a higher proportion of a combined mature and old/very old age group than is found in the GA. These combined groups are close to the middle of the NRV and DC in the IRA while the GA is below both the NRV and DC.

- 7. If the IRA had the NRV fire activity, it would be more diverse and supportive of all of the native flora and fauna habitats.

- 8. As conifer stands age, they develop more of an understory, increased density, add more dead/down fuel, and have increased insect and/or disease activity. All these conditions add to the risk of a significant wildfire burning across much of the IRA with results beyond those expected if the forested conditions are more within the NRV.

- 9. This type of fire could eliminate most of the mature and old/very old components and change those burned areas to either NF or very young stage in one event.

- 10. However, even if the IRA is now at somewhat more risk from wildfire, it provides a much-needed mature and old/very old habitat combination that is lacking outside of the IRA.

- 11. Existing mature and old/very old stage stands currently provide habitat for key sensitive and/or threatened species, such as grizzly bear, wolverine, Canada lynx and white-bark pine in the GA.

- 12. Since there is little of the mature and old/very old age class combination in the GA it appears likely there are minimal habitat linkages with other IRAs.

- 13. Any forest project, wildfire or insect epidemic that would impact the mature and old/very old age class could exacerbate their existing imbalance from both the NRV and DC in the GA.

- 14. The other age classes are also present and offer suitable habitats for a number of species, even if the full set of NRV conditions may not be present.
- 15. Succession continues in the forested area of the IRA, so far with little direct human intervention except for fire suppression and climate change.

Figure 23. Photo looking north from Lazyman Pass, Black Mountain in the right side background.

Score

60% (forested) and 85% (grassland) out of a possible 100%, with a static trend.

The forested portion of the IRA receives a score of 60%. This is based on the fact some components are clearly not within their NRV while others are within their expected range. Disturbance from fire is severely lacking which has helped cause this imbalance of diversity for forest conditions. Insect infestations have been present at an elevated level. Since the forest die-off there has been substantially more abundance and diversity of forb species. Ecological progression will continue to affect forest evolution.

The grass/rangeland portion of the IRA receives a score of 85%. This is based on the fact that while generally healthy, some grassland has been lost to conifer encroachment and noxious weeds are present at a moderate level along the boundary to a light level in the interior.

Human Use and Violations –

Mining activity in upper Colorado Gulch is occurring and resulting in stream channel disturbance and sedimentation. It is not known whether all necessary permits prior to mining have been obtained.

Hazards for humans and wildlife have been created from trail construction (Blackhall Meadows access in the S. Fk. of Travis Creek) where deep pits have been left when "borrow" material has been dug out to create banked mountain bike trails. An extensive user created trail network from private lands in Willow Creek on the north side of the IRA, as well as up and over Colorado Mountain and then down to the Moose Creek cabin on the south and west flank of the Lazyman IRA was documented and is in need of reclamation and enforcement. In violation of regulations, both legal and illegal trails are being used by e-bikers within the IRA.

Illegal trail construction and motorized use has resulted in wildlife displacement (Willow Cr. wintering elk) and injured and smashed animals (adjacent Park Lk area, rabbits and frogs run over; see Subunit C Fig. C30-C32). Whether the grizzly bear (Subunit B, Fig. B34) was just passing through or was displaced due to logging activity at the time is unknown, but tracks have been present within the IRA. The FS has been responsive when we report incidents/violations, however, the forest's management strategy needs to be comprehensive so management and enforcement are coordinated.

Figure 24. Banked trail recently constructed in Travis Creek

Recommendations: Enforcement needs to be localized at the Forest, rather than administered from a national level, which does not work. Travel plan violations and unauthorized uses have been occurring.

HHAA requests to be involved as trails (primarily for mountain bikes) are considered or proposed in the IRA or within ½ mile.

Score

60% out of a possible 100%, with a downward trend.

Overall, recreational activity on the Forest has increased since the Covid pandemic. With the Lazyman IRA occurring close to Helena's population center, the area is barely holding its own in terms of wildland integrity. Mining activity in upper Colorado Gulch was documented and it is suspected that mining equipment that has created the disturbance is hidden, for use again during warm months. The IRA score could be higher if private trails, illegal motorized use, and other unauthorized activity were curtailed.

On a positive note, an illegal hunting camp was discovered and some of the materials and trash has been removed. HHAA has offered assistance in cleaning up the rest.

General Observations -

Overall, the Lazyman IRA was in moderate shape. Good wildlife habitat exists as evidenced from the presence of abundant ungulates, its use as a movement corridor for rare species and nesting habitat for sensitive species. There is an upward trend in illegal intrusions that will only intensify with its proximity to Helena. Therefore focused, conscientious agency management needs to occur to monitor and oversee Travel Plan enforcement, illegal grazing, noxious weed control, small miner activity, and enforcement of other illegal activities like permanent or abandoned hunting camps, trail clearing, mountain biker trail building, etc. Helena Hunters is available to help with those tasks.

Overall Score

75% out of a possible 100%, with a downward trend over historical conditions.

The overall functioning condition of the Lazyman IRA was rated at 75%. There is plenty of room for improvement and such efforts should be undertaken because the Lazyman IRA is a treasure sitting just outside Montana's capitol city. Its status as an Inventoried Roadless Area needs to be maintained and highlighted for public understanding of its ecological value both on the landscape and to the community.

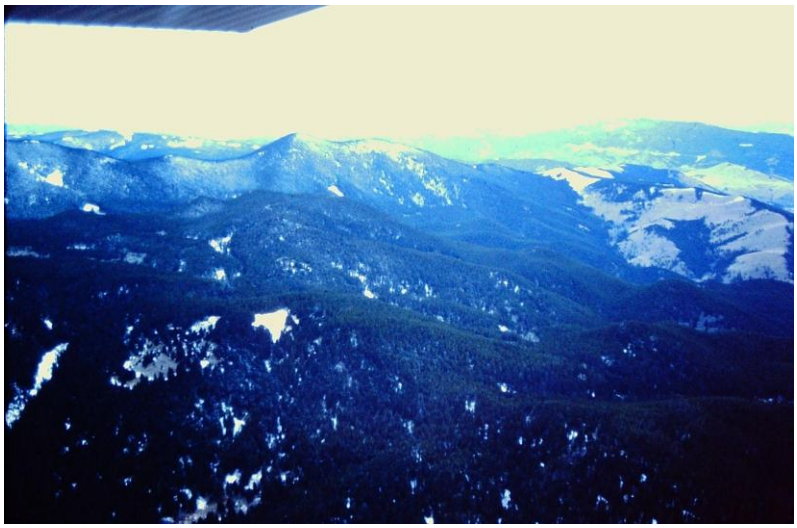


Figure 25. Aerial photo of Lazyman IRA looking southwest, D. Powell.

RECOMMENDED ACTIONS

We are at a tipping point for the Lazyman Inventoried Roadless Area. This IRA is a gem for wildlife and wild land values, but without careful attention and regulatory enforcement human use will overwhelm the wildland integrity of this special area.

Aerial Surveys -

Aerial Surveys provide IRA border monitoring information in a short amount of time, especially behind private land barriers and gathering information for law enforcement through following tracks of motorized use that leave the IRA and cross through multiple land ownerships, terminating at a residence.

Perimeter signage -

It is important permanent durable signs be installed at multiple entry points into the Lazyman IRA indicating that you are entering an inventoried roadless area with use restrictions. Language pertaining to "Leave No Trace" camping etiquette, etc. would also be appropriate together with area maps allowing orientation for visitors. Examples of appropriate current signage is lacking for the Lazyman IRA but within the Nevada Mountain IRA, on the west side of the Divide at the Nevada Creek trailhead, an example of model signage exists and would be a good format to follow.

Within IRAs, timber harvest is designed to be governed by the Roadless Area Conservation Rule, however accurate, clear boundary markings around the perimeter of the IRA must be established and is important to avoid incursions and further shrinkage of the IRA as noted previously in *Background* section. HHAA is willing to assist in physically marking the perimeter of the IRA to prevent further shrinkage.

Travel Plan Enforcement -

HHAA documented illegal road/trail building from private property in Moose Creek, Colorado Gulch, and Nelson Gulch, as well as illegal road construction by the Helena Ranger District in the Travis Creek drainage during the Tenmile-South Helena Project. Better monitoring and enforcement of the current Divide Area Travel Plan is essential. HHAA is willing to assist with sign installation, gate repair, and boundary perimeter marking.

Illegal roads and trails -

Preempting and preventing illegal trail and road construction coming from private lands into the IRA must occur through education, enforcement, and diligent signage. HHAA is willing to assist with signage or reclamation efforts.

Illegal activities noted by HHAA have been or are currently occurring in the following locations:

- Nelson Gulch-Grizzly Gulch (trails emanating from private property into the north portion of the IRA, as well as a two track graveled road that extends through creek/wet areas),
- Travis Creek (adjacent landowner encroachment onto adjacent IRA lands to store items or create access trails into the IRA), and mountain bike trail construction involving jumps and trail banking (reported to Helena Ranger District);
- Upper Corral Gulch/Colorado Gulch (trail clearing and widening to 15 feet, tree limbing and removal were involved and ATV tracks noted - reported to Helena Ranger District);
- Moose Creek (road construction via bulldozer behind private land into IRA – reported to Helena Ranger District);
- Lazyman Creek (full-sized vehicle incursions behind gates – reported to Helena Ranger District);
- Willow Creek-W.Fk. Colorado Gulch:

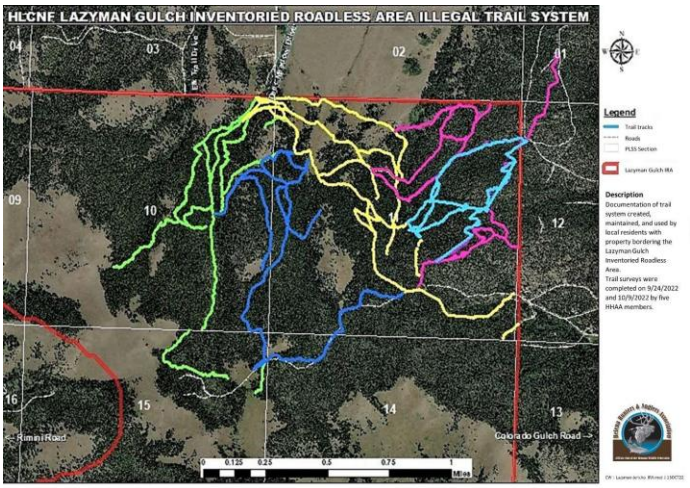


Figure 26. Map of Illegal trails, Willow Creek.

  - Documentation of ebikes and extensive illegal trail network (07/2022)
  - Action: signage installed by Forest Service with HHAA volunteers referencing regulations that prevent trail construction/maintenance
  - Regulation fliers distributed and posted regarding trail prohibitions
  - Community meetings attended by HHAA where historic perspectives were provided
  - Proposed road/route construction with machinery for livestock watering tank (12/2025)
  - Continued illegal clearing of illegal trails subsequent to notices mailed and signs posted by Forest Service (01/2026)

Weed control -

Noxious weeds are a significant problem around the entire periphery of the Lazyman IRA, although the interior is relatively free of weeds. Weed encroachment is gradually occurring as a result of public access, illegal access construction, and livestock grazing that may be both permitted and unpermitted. Evidence of unpermitted grazing activity was present in Colorado Gulch. Grazing permit conditions need to be monitored and assessed for compliance. The HLCNF should develop and implement a weed control plan and share the implementation burden with grazing permittees, where appropriate.

Reclamation/cleanup of abandoned hunting camps and structures -

One abandoned hunting camp was located during our surveys, including permanent structures, plastic piping to divert water, abandoned tools and supplies, wooden subflooring for tents, buried plastic barrels, etc.. Most of the camp is still there. There are three caches of equipment hidden west and

north of the camp site. A new trail has been constructed from Blackhall Meadows to this campsite. Also, at this campsite there is a placer mining operation. The creek was diverted and used to wash away soil to expose gravel. Large rocks were piled along the ditch. New activity was noted in the fall of 2025.

Cleanup is warranted and Helena Hunters and Anglers members are prepared and willing to assist the HLCNF in this effort. Livestock would be needed to pack out garbage.

Trapping monitoring and enforcement –

Furbearer trapping is known to occur in the Travis Creek area and domestic animals have been caught (V. Kent, local resident and dog owner; photo by V. Kent).

Trapping can pose a threat to some listed wildlife species, particularly lynx and wolverine. We encourage monitoring and enforcement of area trapping by Montana FWP and HLCNF and public education about trapping regulations, sensitive species, lynx and wolverine recovery restrictions, and an expanding grizzly population.

Figure 27. Trap that caught a domestic dog while hiking with its owner in Travis Creek.

Trapping on Forest Service lands within or adjacent to subject IRAs in proximity to documented wolf, wolverine, and lynx presence is a concern and HHAA will continue to transmit information as we discover issues and communicate with agency managers in writing. We are hopeful this dialogue can extend to the other recommendations presented above.

Figure 28. Large wolf track regularly observed in Lazyman IRA, in 2020.

Prescribed fire and benefits -

The Lazyman IRA has experienced fire suppression for decades and can benefit from prescribed fires to reduce fuels and litter buildup and to suppress conifer encroachment that is occurring in the former south facing clearings favored by big game. For over 80 years wildfires have been suppressed.

Depending on the time of year and severity of the fire season, many would have been underburning events with a slow, crawling character. Others could have been more severe, stand-replacing events in some locations. The overall result would have resulted in a more diverse, mosaic vegetation pattern.

Heavy equipment use must be avoided in IRAs and burned areas should not be reseeded, but left to revegetate naturally.

Figure 29. Diverse forested landscape.

Prescribed fire would be the preferred tool to use in a forest management project designed to restore or move an area toward its NRV. From a logistical and safety standpoint, prescribed fire use may be limited. Given the relatively small size of the Lazyman IRA, prescribed fire use could be employed throughout the IRA, in more accessible locations and in the more frequent fire-return interval forest types. The interior of the IRA is composed mostly of the longer-fire return interval forest types and the significant type of natural fire that visited these areas were most often of a stand-replacing nature, although not necessarily with one event impacting the entire IRA. An effort to use prescribed fire to replicate natural fire's role in these stands pose enormous logistical and safety issues.

The current forest conditions could easily help cause a fire to exceed both intensity and extent of a planned prescribed fire. Restoration of the natural role of fire may best be accomplished by applying an "appropriate suppression response" to fires that occur in the right place at the right time. As opportunities arise to allow such fires, some diversity will increase, site-specific fuel reduction could be achieved, and gains toward management objectives realized. The HLCNF is pursuing an extensive long-term program involving prescribed fire. We would encourage the forest to look for opportunities to include the Lazyman IRA in this work and HHAA would be interested in making site-specific

recommendations that would benefit wildlife. This should be a high priority for work because of its proximity to Helena, both for the benefit of people and of wildlife.

Climate related hydrologic impacts -

Seven of the last ten years of snow depth and snow water equivalent data have been at or below average, and 2026 is following that trend. Daily average temperature has been above average and five of the seven projections for snow water equivalent for 2026 are below average based on the U.S. Geological Survey gauging station in Frohner Meadows, which is within two miles of the Lazyman IRA. These conditions are likely to continue, which will likely negatively impact moist habitats, the Tenmile municipal water supply, coldwater fisheries and other aquatic life in Beaver Creek, Tenmile Creek, Moose Creek, Lazyman Creek, Willow Creek, Colorado Gulch Creek, Nelson Gulch Creek, Grizzly Gulch Creek, Travis Creek, and other streams. This loss of habitat will equate to a loss of overall biointegrity.

Forest health issues -

Climate change, persistent drought, forest insects and fire prevention have created unnatural fuel loading conditions in much of the IRA. Prescribed burns could help address this situation while simultaneously benefitting wildlife and other values.

Diminishing size of Lazyman IRA –

We request that the Helena Forest recognize the original Lazyman IRA boundaries and acreage (12,700 acres) and actively work to protect the area from intrusions or shrinkage.

In Alternative D of the FEIS for the 2021 Forest Plan, the Lazyman IRA was assigned a Wilderness option of 8,168 acres and then re-labeled as the proposed Colorado Mountain Wilderness Area. Helena Hunters and Anglers Association is concerned that the FS may conclude that this action absolves them from considering the full extent of the area under Roadless Rules, now and in the future. We would like clarification on this issue, and believe that the original size of the Lazyman IRA should be honored. Our concerns seem justified given the creeping shrinkage of the area (see ***Diminishing Size of Lazyman IRA***, in the ***Background*** section).

Livestock grazing -

Grazing permits, allotment management plans, and associated activity within and adjacent to IRAs need annual review and evaluation. Livestock grazing exacerbates weed spread and stream bank instability leading to sedimentation and other aquatic damage. Noxious weeds often create impacts to riparian areas, and such impacts are occurring along the edges of the Lazyman IRA, although the interior of the area shows limited weed occurrence. The HLCNF should develop and implement a weed control plan and share the implementation burden with grazing permittees, where appropriate.

Agency follow-up –

A number of the above issues of concern, including user created trails and roads, travel plan violations, unauthorized camp establishment, and noxious weed infestations, have been previously conveyed to the HLCNF land managers and a dialogue was initiated about corrective measures for some of these, including the potential for volunteer assistance by HHAA. We also wish to see the acreage and boundary of the IRA restored to its original 12,700 acres.

Figure 30. Healthy grasslands in the heart of the Lazyman-Black Mountain IRA.

HHAA hosted and attended meetings with those involved with resource monitoring (Montana Fish, Wildlife and Parks, Helena Ranger District, and Wild Things Unlimited) to discuss data sharing and collaborative monitoring opportunities. E-bike trails and use issues had a positive resolution initially, with HHAA taking a lead role and HLCNF staff actively supporting the effort. But it is clear that a more comprehensive approach is needed (education, signage, and enforcement, etc.).

Positive observations include a steel gate that was installed at the bottom of the Environmental Trail in Lazyman Gulch next to the Tenmile picnic area. Also signage was installed to educate landowners and stop illegal trail construction in Willow Creek. Additionally, meetings were held with monitoring personnel at MFWP and Wild Things Unlimited to discuss data sharing and collaborative monitoring opportunities.

Helena Hunters and Anglers Association reiterates its desire to work with the HLCNF to assist with gate and signage installation where needed, removal of illegal structures, and public education to ensure the healthy future of the Lazyman-Black Mountain Inventoried Roadless Area.

ACKNOWLEDGEMENTS

The Inventoried Roadless Area monitoring program has been generously supported by the Cinnabar Foundation which has provided funding for aerial surveys of the Lazyman and Nevada Mountain IRAs, website maintenance, as well as mapping software that has been instrumental in portraying features of these areas and IRAs to be inventoried in the future. Generous contributions to matching Cinnabar's grants have come from Ken and Stephanie Wallace whose vision for wildlands support HHAA's mission.

Information shared by Montana Fish, Wildlife and Parks regarding big game population trends, and wildlife distribution and movements within and through the Lazyman IRA, are appreciated. Thanks go to Helena-Lewis and Clark National Forest personnel, in providing metadata for our mapping efforts, and for their responsiveness to HHAA "Incident Reports" and cooperation in resolving some of those situations on the ground.

Citizens and HHAA members at large who have donated their time to conduct surveys, provide photos, and assist HHAA members with field work include Nick Sovner, Bill Orsello, Paul Ferry, Vicki Kent, Beth Kaeding, and Tani Converse. Technical website maintenance was contributed by Clayton DeSimone.

In addition to conducting field monitoring and being authors of this report, invaluable contributions have been made by wildlife biologist Doug Powell who provided piloting proficiency for aerial surveys, and by Camie Westfall whose digital data and mapping skills helped direct our efforts in the field and display various aspects of these areas. The professional backgrounds of report authors were instrumental in telling the stories of the IRAs, including that of hydrologist Gary Ingman, vegetation management specialist Dennis Milburn, archeologist Steve Platt, recreation manager Rod Bullis, and wildlife biologist Gayle Joslin.

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APPENDICES

LIST OF APPENDICES

A. Aerial Survey Form

B. Field Assessment Forms – Boundary Condition

C. Field Assessment Forms – Hydrology

D. Field Assessment Forms – Wildlife

E. Field Assessment Forms – Vegetation

F. Field Assessment Forms – Human Use and Activity

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J. Lewis and Clark County Resolution 2008-57: Habitat along the Continental Divide

K. General Forest Area Condition - Lazyman Inventoried Roadless Area

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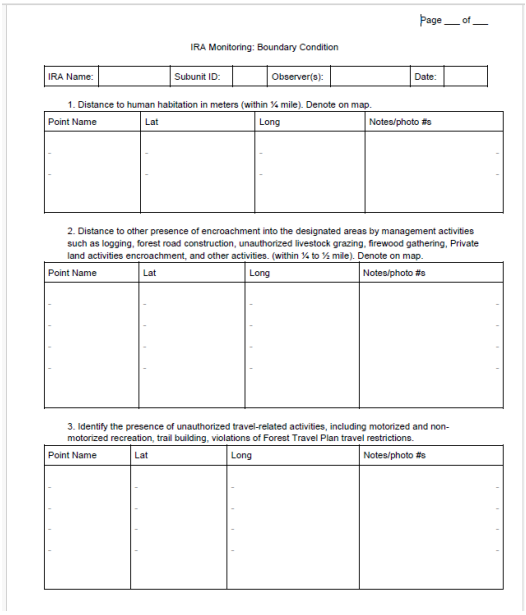
Helena Hunters and Anglers' GOOGLE DRIVE houses all referenced reports.

A. Aerial Survey Form

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	***Helena Hunters and Anglers IRA Flight Observations***						**Pilot and Observer:**						
2													
3	**IRAs/Areas Surveyed:**												
4													
5	**Date:**					**Time Out:**		**Time In:**			**Duration:**		**Pg ___of ____.**
6													
7	**ather Conditions:**												
8													
9													
10	**Time**			**Wpt./photo**		**Description**							**Lat-Long/UTM**
11													
12													
13													

B. Field Assessment Forms – Boundary Condition



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IRA Monitoring: Boundary Condition

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. Distance to human habitation in meters (within ¼ mile). Denote on map.

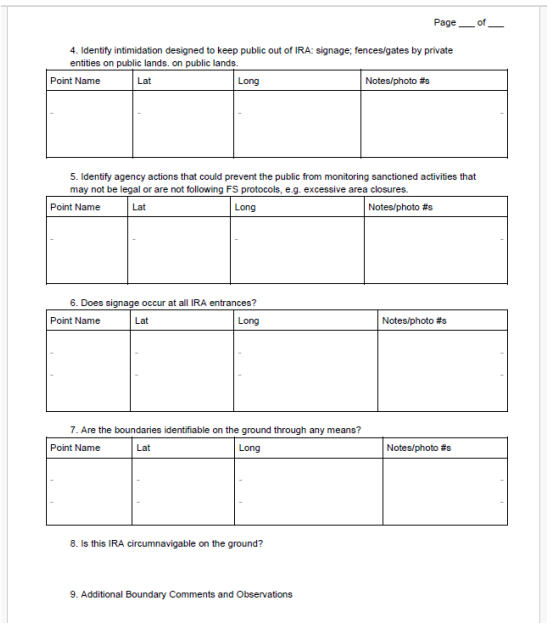
Point Name	Lat	Long	Notes/photo #s

2. Distance to other presence of encroachment into the designated areas by management activities such as logging, forest road construction, unauthorized livestock grazing, firewood gathering, Private land activities encroachment, and other activities. (within ¼ to ½ mile). Denote on map.

Point Name	Lat	Long	Notes/photo #s

3. Identify the presence of unauthorized travel-related activities, including motorized and non-motorized recreation, trail building, violations of Forest Travel Plan travel restrictions.

Point Name	Lat	Long	Notes/photo #s



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4. Identify intimidation designed to keep public out of IRA: signage; fences/gates by private entities on public lands. on public lands.

Point Name	Lat	Long	Notes/photo #s

5. Identify agency actions that could prevent the public from monitoring sanctioned activities that may not be legal or are not following FS protocols, e.g. excessive area closures.

Point Name	Lat	Long	Notes/photo #s

6. Does signage occur at all IRA entrances?

Point Name	Lat	Long	Notes/photo #s

7. Are the boundaries identifiable on the ground through any means?

Point Name	Lat	Long	Notes/photo #s

8. Is this IRA circumnavigable on the ground?

9. Additional Boundary Comments and Observations

C. Field Assessment Forms – Hydrology

IRA Monitoring: Hydrology

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. Sedimentation, headcuts, dredging.

Waterbody Name (if known)	Point Name	Lat	Long	Notes/photo #s

2. Catastrophic erosion event/washout.

Waterbody Name (if known)	Point Name	Lat	Long	Notes/photo #s

3. Evidence of hydrologic impacts of wildfire (streamflow and erosion).

Waterbody Name (if known)	Point Name	Lat	Long	Notes/photo #s

4. Riparian trampling (impacting hydrology/water quality).

Waterbody Name (if known)	Point Name	Lat	Long	Notes/photo #s

5. Additional Hydrology Comments and Observations

D. Field Assessment Forms – Wildlife

IRA Monitoring: Wildlife

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. Note observations of wildlife: squirrels, chipmunks, nutcrackers, camp robbers (gray jays), woodpeckers, etc.

Species	Quantity & Sex	Point Name	Lat	Long	Notes/photo #s
-	-	-	-	-	-
-	-	-	-	-	-

2. Note tracks/sign of wildlife (spp); scat (spp); rubs (elk/deer/moose); scrapes (lion); porcupine bark feeding; bedding areas and number of beds

Species	Quantity/Size	Point Name	Lat	Long	Notes/photo #s
-	-	-	-	-	-
-	-	-	-	-	-

3.Trail Cam check? Y / N

4. Additional Wildlife Comments and Observations

E. Field Assessment Forms – Vegetation

IRA Monitoring: Herbaceous Plants

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. Notes about observed evidence of wildfire and/or prescribed burns

Point Name	Lat	Long	Notes/photo #s

2. Riparian vegetation health and apparent causes of any degradation. Presence of hedging, highlining, or trampling present from overgrazing.

Waterbody Name (if known)	Point Name	Lat	Long	Notes/photo #s

3. Weeds. Species to watch for: smooth brome, cheatgrass, dalmatian toadflax, yellow toadflax, spotted knapweed, diffuse knapweed, leafy spurge, houndstongue, mullein, canada thistle, musk thistle, bull thistle, diffuse knapweed, common buckthorn, tall buttercup, perennial pepperweed, meadow hawkweed, orange hawkweed, bindweed, whitetop, sulfur cinquefoil, oxeye daisy, common tansy, hoary alyssum, st johnswort, common burdock, black henbane.
https://www.lccountymt.gov/fileadmin/user_upload/Weed_District/Documents/Priority_Weed_List_June_21_2019.pdf

Weed Species	Size of patch (ft x ft)	Point Name	Lat	Long	Notes/photo #s

4. Sensitive species: see list from MT Heritage

Species	Apprx size of patch (ft x ft)	Point Name	Lat	Long	Notes/photo #s

5. Additional Vegetation Comments and Observations

F. Field Assessment Forms – Human Use and Activity

IRA Monitoring: Human Use and Violations

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. Vehicle count at access locations to this subunit (non-HHAA survey vehicles)

Count of vehicles	Point Name	Lat	Long	Notes/photo #s

2. Recreational Use observations (snowmobiles, skiers, bikers, ATVs, wood cutting; tracks, cut trees/shrubs, gravel placement at water crossings, constructed facilities such as tree stands, lean-tos, water pipes, ground leveling, corrals, etc.).

Use Type	Problematic/ Illegal (Y/N)	Point Name	Lat	Long	Notes/photo #s

3. What other human uses are occurring within the IRAs besides recreation (livestock grazing, firewood cutting, mining/prospecting, foraging, fishing, hunting, trapping etc.)

Use Type	Problematic/ Illegal (Y/N)	Point Name	Lat	Long	Notes/photo #s

4. Observed agency management/use

Use Type	Problematic/ Illegal (Y/N)	Point Name	Lat	Long	Notes/photo #s

5. Generally describe adjacent land use within ½ mile – heavily roaded; agricultural; logged (how recently; monoculture?); mining; recreational use (ski area; ATVs; mtn bike)

- Roads; motorized trails Yes/No
  - comments:
- Recreational facilities Yes/No
  - comments:
- Timber harvest: Yes/No/Unknown
  - comments:
    - • past (5 years old); Yes/No/Unknown
      - comments:
    - • present (0-5 yrs); Yes/No/Unknown
      - comments:
    - • future (planned within 10) Yes/No/Unknown
      - comments:
- Agricultural Yes/No
  - comments:
- Houses Yes/No
  - Comments:
- Mining Yes/No
  - comments:

6. Additional Human Use and Violation Comments and Observations

G. Field Assessment Forms – General Observations

Page ___ of ___

IRA Monitoring: General Observations

IRA Name:		Subunit ID:		Observer(s):		Date:	

1. General positive aspects and assessment of condition observed for the IRA subunit surveyed

2. General Negative aspects and assessment of condition observed for the IRA subunit surveyed

3. Additional Comments/notes/observations that were not captured on other forms or questions

Point Name	Lat	Long	Notes/photo #s

H. Field Monitoring Summary Sheet (Cheat Sheet)

IRA On-the-Ground Field Monitoring Cheat Sheet

Form	Observation Cues	How to Document
Boundary Condition	-Signage or markings at entrance points to the IRA -encroachment activities into the boundary (motorized travel, private land encroachment, trail building, -evidence of intimidation designed to keep public out of IRA by private entities (signs, fences, gates)	Drop points in Avenza (lat/long); photos; if necessary, elaborate on descriptions on **Boundary Cond. Form**
Hydrology	-Disturbance to waterbody/waterway. -Sedimentation, headcuts, dredging, -catastrophic erosion event or washout, -hydrologic impacts from wildfire (streamflow/erosion), riparian trampling (hydrology/bank erosion, water quality/turbidity/algae, riparian vegetation overgrazing/destruction), -Absence of woody/shrub vegetation on banks	Drop points in Avenza (lat/long); photos; if necessary, elaborate on description of observed impact on **Hydrology Form**
Wildlife	-Document observed wildlife of interest. -Tracks, sign, beds, dens, nests, rubs, scapes, calls, hair, feathers, etc. -signs of sickness or disease -Short List: grizzly bears, grouse, elk, wolverine, lynx, mtn lion, amphibians, moose, mule deer, porcupine, beaver, raptors, bobcat, wolves, martin, nutcracker, mountain goats, bighorn sheep, otter, pika, etc	Drop points in Avenza (lat/long); photos; record species, sex, number, age(s), etc, if necessary, elaborate on description on **Wildlife Form**
Plants	-Disturbance by wildfire/prescribed burn, -Riparian vegetation health issues from overgrazing (highlining, trampling, hummocking, etc), -unique/rare/sensitive species: orchids, whitebark pine, etc -lack of diversity/monoculture of species in certain areas -conifer encroachment and/or sagebrush on meadows and parks -evidence of beetle kill/disease -noxious/county listed weeds: toadflax, knapweed, leafy spurge, houndstongue, canada thistle, musk thistle, hawkweed, black henbane, bindweed, whitetop, oxeye daisy, common tansy, hoary alyssum, smooth brome, japanese brome, cheatgrass, mullein, etc	Drop points in Avenza (lat/long); photos; record species, number/size of population, etc, if necessary, elaborate on description on **Plants Form**
Human Use and Violations	-count vehicles observed at public access locations -general recreational use observations (snowmobiles, hiking, skiers, bikers, ATVs, trail creation/maintenance -not by FS, mountain biking, skiing, vehicle tracks, cut trees/shrubs, modified water crossings, constructed facilities, tree stands, lean-tos, water pipes, ground leveling, corrals, camping) -other human uses (livestock grazing, firewood cutting, mining/prospecting, foraging, fishing, hunting, trapping, etc) -agency management/use (timber harvest, use of flagging/tree marking) -Adjacent land use within 1/2 mile of IRA boundary (heavily roaded, trailheads, agriculture, logging, mining, recreational use, houses/private land ownership, campgrounds, etc)	-Drop points in Avenza (lat/long); photos; short description; if necessary, elaborate on description of observed impact on **Human Use and Violation Form** -For Adjacent uses within ½ mile: describe on **back of Human Use and Violation Form**
General Obs	-General positive AND negative aspects and assessment of condition observed in each subunit -additional general observation not captured on the other monitoring forms	-Describe on **General Obs Form** -Drop points in Avenza (lat/long); photos;

I. Log of Volunteer Field Hours and Mileage

LOG OF VOLUNTEER
FIELD HOURS AND M

Date	Name	Apprx Miles Driven	Apprx Hours (includes drive time)	Apprx Expenses	Was it Fieldwork or a Meeting	Brief Description	IRA

J. Lewis and Clark County Resolution 2008-57: Resolution to Protect and Promote Conservation of Wildlife Habitat and Corridors along the Continental Divide

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.

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Page: 1 of 1
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Lewis & Clark County COUNTY Bk-M38 Pg-4705

LEWIS AND CLARK COUNTY
BOARD OF COMMISSIONERS

Ed Tinsley, Chairman

ATTEST:

Paulette DeHart, Clerk of the Board

Appendix K

General Forest Area Condition

Lazyman Inventoried Roadless Area

Process and Assumptions

Commonly used Acronyms:

AS/HW	-	Aspen/Hardwood	NF	-	Non-forest (grassland, rock, scree)
DC -	-	Desired Condition	NRV	-	Natural Range of Variation
DF	-	Douglas fir	PP	-	Ponderosa Pine
FP	-	Forest Plan	SpFir	-	Spruce and/or Subalpine Fir
GA	-	Geographic Area	LP	-	Lodgepole Pine
IRA	-	Inventoried Roadless Area	WBP	-	White Bark Pine

As part of our broad-scale monitoring effort for forest conditions in the Inventoried Roadless Areas (IRAs), we evaluated the existing condition diversity compared to the Natural Range of Variation (NRV) expectations for size class. The Helena-Lewis & Clark Forest Plan (FP) describes five size classes: seed/sap (0-4.9dbh), small (5-9.9dbh), medium (10-14.9dbh), large (15-19.9dbh), very large (20+dbh). For discussion purposes, these size classes can generally approximate, or relate to, differences in age groupings – very young, young, mature, old and very old. This grouping works well for most cover types. However, it does not work for lodgepole pine (LP). The medium size class for LP should be included with the "old" age group.

Vegetation Cover Type and Density Class were also examined to see how the existing condition compared to the NRV. Cover Type identifies by percent of area occupied by non-forested areas and the various tree species. The FP displays 3 levels of Density Class as determined by percent of canopy closure, low/medium at 10-39%, medium/high at 40-59% and High at 60 and greater%.

The R1 VMap database used in the FP, the 2019 version, was the primary source of information for this evaluation, along with some site-specific field observations in the summer of 2023 as well as years of on-the-ground knowledge and experience within the IRAs by the monitoring group members. R1-VMap is a consistent and continuous geospatial database for existing vegetation and associated attributes. There have been some human modifications to the landscape since the 2019 version due to logging and fuel management projects. These changes would marginally impact the

percentages of the vegetation attributes displayed in this document. The NRV values for the Geographic Areas (GA) are determined through SIMPPLLE, a spatially-explicit, dynamic landscape modeling system for projecting temporal changes in the spatial distribution of vegetation in response to insects, disease, wildland fire and other natural and management-caused disturbances. The NRV values are not available for the site-specific IRAs.

Each IRA is not an island unto its self, they exist within a greater landscape and the type of conditions across the landscape have implications on the potential management for the IRA. Therefore, we also used the FP Final Environmental Impact Statement data (Vol. 5, Appendix H, pg. 44, 67 and 77) for the existing and NRV size class as well as Density Class and Cover Type for the Divide GA. The Desired Condition (DC) range is defined in the FP, Chapter 3, pages 151-152. Combined, these attributes provide insight into how the IRA contribute to the landscape's NRV condition and diversity.

Site-specific Field Observation Notes, Lazyman IRA, 11,600 acres, Divide GA

1. Some areas in the Lazyman drainage that were at one time very open, woodland type, ponderosa pine (PP) stands have developed a dense understory of primarily Douglas fir (DF).
2. In the far northwest corner, small size class DF stands are encroaching into grasslands.
3. The upper reaches of Colorado Creek, North of Blackhall Meadows, are primarily medium to very large size DF stands with significant dead/down trees and often with a developing understory.
4. Significant areas of beetle-killed LP are present along the upper ridges NE of Blackhall Meadows. Most of the dead trees have fallen to the ground. Some live trees still stand and some regeneration is occurring.
5. Over the years, some small grass covered clearings have been encroached upon and converted to a conifer cover type.
6. Southeast area has DF overstory of medium to large trees with significant second growth understory.

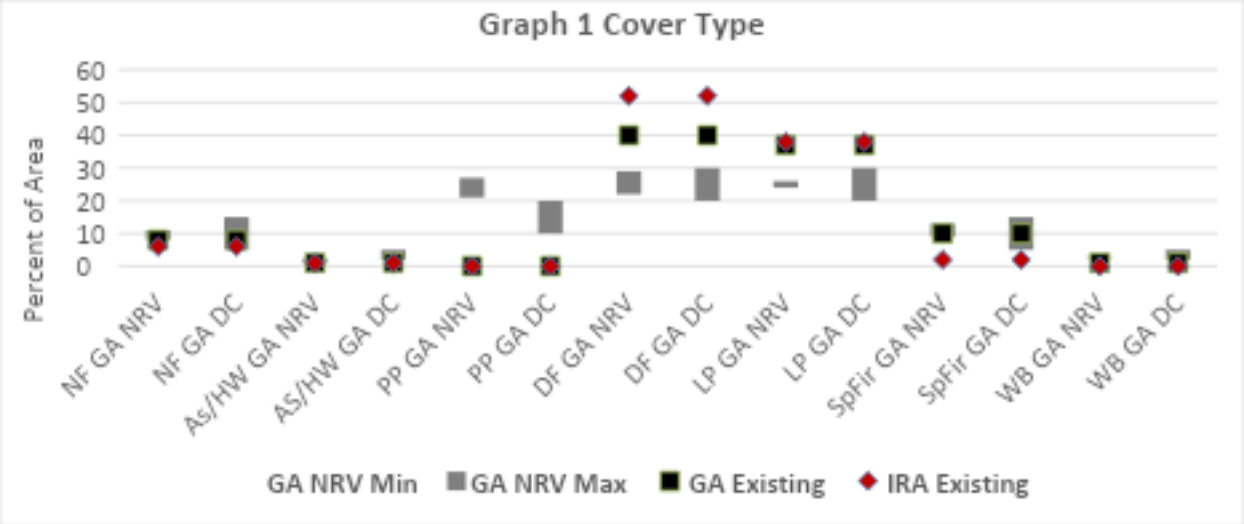
Selected R1 VMap and SIMPPLLE Components

There are no NRV and DC values available for specific IRAs. However, we believe it is useful to display and discuss how the existing condition within the IRAs contributes to the overall forest diversity and objectives for the GAs.

R1 VMap/SIMPPLLE Graphs and Table

The following graphs plot the existing conditions within the GA and IRA against the NRV and DC for select forest attributes.

NF=Nonforest, AS/HW=Aspen/Hardwood, PP=Ponderosa Pine, DF=Douglas Fir, LP=Lodgepole Pine, SpFir=Spruce Subalpine Fir, WB=Whitebark Pine



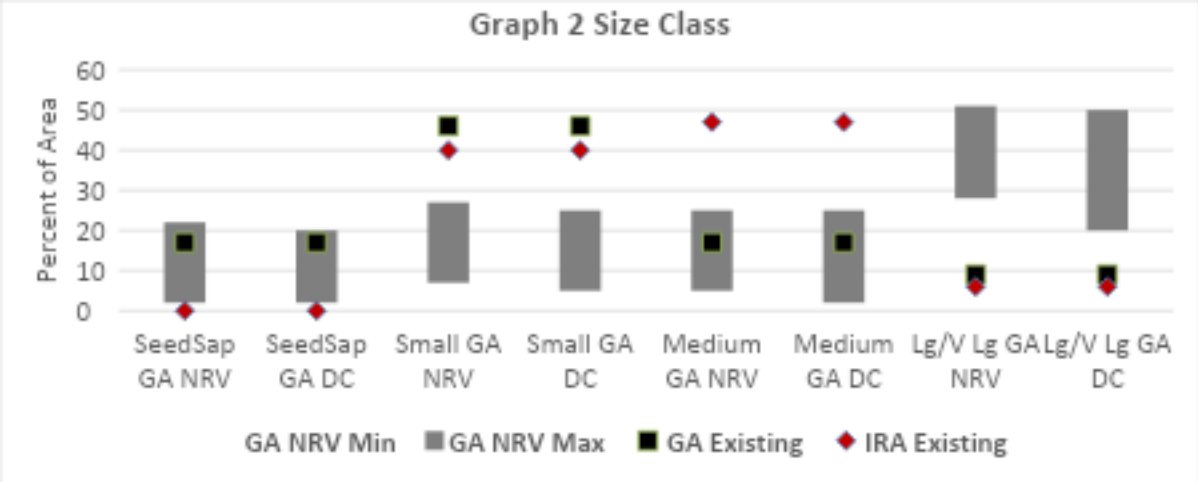
Discussion Points

Divide GA

1. Non-forest and aspen/hardwood types are right at the very low end of the NRV.
2. PP is not observed or not prevalent enough to be considered a cover type, well below both NRV and DC. Other cover type trees have likely become dominant within PP stands.
3. DF and lodgepole pine are both well above the NRV and DC.
4. Whitebark pine is less than 50% of both NRV and DC.

Lazyman IRA:

1. Ponderosa pine is not observed. Other cover type trees have likely become dominant within PP stands.
2. Douglas fir and lodgepole pine are both well above the NRV and DC.
3. Spruce/subalpine fir are well below NRV and DC.



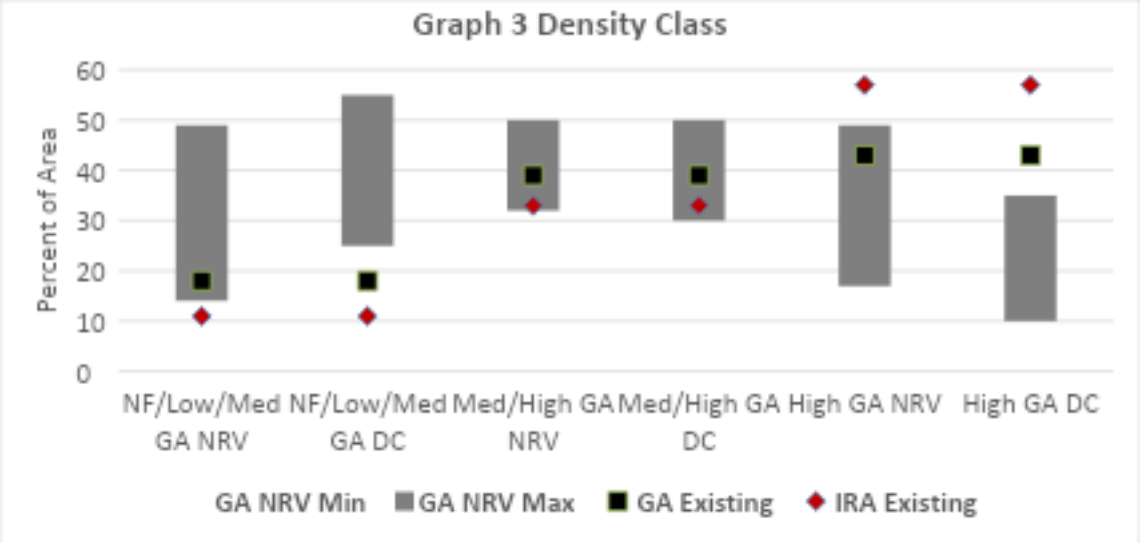
Discussion Points

Divide GA

1. Small size class above both NRV and DC.
2. Large/very large together are far below NRV and DC. It is likely some smaller size classes have become the dominant size class in some of the older size class stands.

Lazyman IRA:

1. Seed/sap appears to be zero.
2. Small is well above both NRV and DC.
3. Medium is well above both NRV and DC.
4. Large/very large is far below the NRV and DC. It is likely some smaller size classes have become the dominant size class in some of the older size class stands.



Discussion Points

Divide GA

1. The high-density class is nearing the upper end of the NRV and higher than the DC.
2. The low-density class is at the low end of the NRV and below the DC.

Lazyman IRA:

1. Low-density class is below the NRV and well below the DC.
2. Medium-density class is at the low end of the NRV.
3. High-density class is well above both the NRV and DC.

After an initial look at some of the differences between existing and NRV on the above tables, it became apparent we needed to examine the fire activity in the IRAs to see if that could explain some of the results. The FP FEIS, Vol.5, Appendix I, pg. 11 displays the NRV and recent (1940-2016) wildfire burned acres for the GA. Table 1 summarizes this data. Without specific information for the IRA, personal knowledge is the basis for estimating burned acreage.

Table 1 Wildfire Burned Acres				
IRA		Acres Burned 1940-2016	Acres Per Decade 1940-2016	Min/Max Acres Burned Per Decade
Lazyman	Existing	little to none	little to none	

Burned Acres, NRV				
Divide GA	NRV		1,900-35,500	400-164,000
	Existing	589	77	

Discussion Points

GA Divide

1. There has been practically no wildfire burned acreage for at least 80 years in the GA.

Lazyman IRA

There is no known significant burned acreage in the IRA over the past 80 years.

Conclusions

It is important to note that the multitude of numbers presented above are not to be considered absolute and infallible. They are the product of remote sensing and modeling, both with their own set of potential errors. The numbers are useful, as part of a broadscale assessment, to illustrate relative values and trends for the various forest attributes. The conclusions discussed below focus on these relative values and trends.

1. An important natural ecological process, wildfire, has been largely excluded from the IRA for at least the past 80 years. The NRV is key to the proper functioning of a fire-adapted ecosystem by being resistant to impacts from disturbance, such as wildfire, insect and disease infestations, as well as resilient from those impacts when they do occur. This lack of the natural fire regime has had some impacts on the NRV in forest composition for structure, age and species, i.e.:
    a. Less NF - mostly grassland impacted as confers expand their range.
    b. Expansion of DF and LP; loss of PP and WBP dominated areas.
    c. Higher density of canopy closure.
    d. Little very young stage (seedling/sapling age class) in the Lazyman IRA.
    e. Young and very young size class trees become dominant in older stands creating multi-storied conditions.
2. R1-VMap identifies the dominant size class by the amount of area occupied for a stand of trees. As succession proceeds, younger, smaller size classes can expand into existing larger size classes and become the dominant size class by number of trees of the area. The large trees may still be there but are “hidden” by the more prevalent smaller trees. This may account for the perceived lack of large/very large size classes and a relative abundance of medium, and smaller size classes. This is why the medium and large/very large tree size classes are combined in much of the following discussion.

3. Even with little to no wildfire burned acreage in the past 80 years in the Divide GA, there is a significant lack of the mature (medium size class) and old/very old (large/very large tree size class) component in the forest ecosystem. Likely a combination of factors such as timber harvest, insect epidemic and, perhaps, disease are the causes.
4. The Divide GA shows an abundance of very young and young age groups. Likely causes are timber harvest, fuel treatments and insect epidemic.
5. The Lazyman IRA has a higher proportion of a combined mature and old/very old age group than is found in the Divide GA. These combined groups are close to the middle of the NRV and DC in the IRA while the GA is below both the NRV and DC.
6. If the IRA had the NRV fire activity, it would be more diverse and supportive of all of the native flora and fauna habitats.
7. As conifer stands age, they develop more of an understory, increased density, add more dead/down fuel, and have increased insect and/or disease activity. All these conditions add to the risk of a significant wildfire burning across much of the IRA with results beyond those expected if the forested conditions are more within the NRV.
8. This type of fire could eliminate most of the mature and old/very old components and change those burned areas to either NF or very young stage in one event.
9. However, even if the IRA is now at somewhat more risk from wildfire, it provides a much-needed mature and old/very old habitat combination that is lacking outside of the IRA.
10. Existing mature and old/very old stage stands currently provide habitat for key sensitive and/or threatened species, such as grizzly bear, wolverine, Canada lynx and WBP in the GA.
11. Since there is little of the mature and old/very old age class combination in the habitat linkages between Lazyman and other IRAs are likely less functional.
12. Any forest project, wildfire or insect epidemic that would impact the mature and old/very old age class could exacerbate their existing imbalance from both the NRV and DC in the GA.
13. The other age classes are also present and offer suitable habitats for a variety of wildlife species, even if the full set of NRV conditions may not be present.
14. Succession continues in the forests within the IRA, so far with little direct human intervention except for fire suppression and climate change. There have been significant human activities impacting forest conditions within the GA outside of the IRA.

Recommendations:

1. Every project NEPA, including Categorical Exclusions, should display how the project contributes toward moving the project area and GA toward the DC or NRV.
2. Projects within a GA that is below the DC for the large and very large size classes, should not target trees of these sizes for removal.
3. Projects within a GA that is below the DC for the large and very large size classes, should not target medium size class tree species that will, at some point, move into the large size class.

4. The data and our site-specific field observations indicate hand thinning the understory that has developed under stands that contain medium and larger size trees could be beneficial. Removing encroaching conifers on grasslands could also help move toward the DC. Thinning should be accomplished within these guidelines:
    a. When feasible, allow natural fire to perform its natural ecological role.
    b. Prescribed fire should also be used, to the extent possible, to burn in a manner similar to a natural fire.
    c. It is recognized that it may be necessary to pre-treat some areas prior to burning, such as slashing prior to burning.
    d. Use the “clump” type of prescription to simulate the way a stand would have appeared with a natural fire.
    e. Handwork by slashing and burning without piling is preferred.
    f. It is recognized that hand piling may be necessary to expand the burn window in some stands.
    g. Helena Hunters and Anglers do not approve of the use of mechanized equipment within the IRAs.
    h. No roads should be built for access in any IRA.