



Montana Fish, Wildlife & Parks

May 12, 2014

Objection Reviewing Officer
USDA Forest Service
Northern Region
PO Box 7669
Missoula, MT 59807

OBJECTION

Proposed plan or plan amendment:

Blackfoot [Non-Winter] Travel Plan, Final Environmental Impact Statement, March 2014

Responsible Official: William Avey, Forest Supervisor

National Forest: Helena National Forest

Ranger District: Lincoln Ranger District

Objectors:

Montana Fish, Wildlife & Parks
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/s/ Randy Arnold

Randy Arnold, Regional Supervisor

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Lead objector:

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May 12, 2014

William Avey, Forest Supervisor
Helena National Forest
2880 Skyway Dr.
Helena, MT, 59602

Reference: Blackfoot [Non-Winter] Travel Plan, Final Environmental Impact Statement, March 2014

Dear Supervisor Avey:

Please find herein the objections of Montana Fish, Wildlife & Parks (MFWP) to the Draft Record of Decision (DROD) for the Blackfoot [Non-Winter] Travel Plan, pursuant to 36 CFR Part 218.

While the term "objection" may seem confrontational, MFWP understands that the US Forest Service intends for the objection process to enhance collaboration. The objection process is the State's point of entry into a transparent and collaborative process that we hope will bring multiple stakeholders together with the Helena National Forest (HNF) Supervisor to address the unresolved issues in the DROD. MFWP welcomes the transparency and the opportunities for problem solving that this new process affords.

We wish to emphasize here, for the record, that the objection process is pre-decisional. The HNF has not rendered a final decision on the Blackfoot Travel Plan, and the DROD is a draft document, subject to change. This distinguishes and contrasts the objection process from the more commonly known appeal process. This letter does not constitute an appeal, or intent to appeal. To the contrary, this letter begins a collaborative process intended to produce a final decision that would be better supported, rather than appealed.

MFWP's mission is broad, but our objections are centered on two specific sets of values for which Montana relies on the HNF: delisting of the grizzly bear, and the continued provision of elk hunting opportunities on public lands for present and future generations. We further suggest that these values set the HNF apart from the rest of the National Forest System, with regard to the multiple uses that we offer

In MFWP's opinion, portions of the Blackfoot Travel Plan Alternative 4 would unacceptably degrade certain grizzly bear habitats and movement corridors both within the Recovery Zone/Primary Conservation Area (PCA) and an occupied Biological Activity Center (BAC) outside of the Recovery Zone. MFWP believes that certain provisions within Preferred Alternative 4 may not be consistent with the Interagency Grizzly Bear Guidelines (IGBC 1986) and other guiding documents relevant to the management of the NCDE grizzly bear population, including the USFWS Grizzly Bear Recovery Plan (USFWS 1993), the MFWP Grizzly Bear Management Plan for Western Montana (MFWP 2006), the NCDE Access Management Protocol, and the Flathead National Forest Plan's Amendment 19 (USDA 1995), and the Draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013). The Blackfoot Travel Plan Preferred Alternative 4 also appears inconsistent with Travel Plans previously adopted by other Forests in the Northern Continental Divide Ecosystem--and MFWP is seriously concerned that the adoption of the Preferred Alternative, as written, may jeopardize ongoing state and federal efforts to delist grizzly bears within the NCDE.

MFWP recognizes that adoption of the Preferred Alternative 4 would eventually reduce overall open-road density within the Recovery Zone/PCA and occupied grizzly habitat outside of the Recovery Zone. However, planned road and trail construction/reconstruction, re-designation of routes as motorized, development of a connected OHV loop trail system, construction of 7 new trailheads and 2 parking areas, and promotion of the LRD as a destination for OHV recreation will--over time--significantly *increase* the amount and distribution of motorized use of the LRD. Therefore, despite reduction of overall open-route density, implementation of Alternative 4 would increase grizzly bear disturbance and risk, compared to the existing condition.

Adoption of the Preferred Alternative 4, and the Big Game Security Amendment Alternative B would inadequately provide or protect secure fall, big game habitat within several LRD Elk Analysis Units (EAUs). Such a decision would also contradict standards for provision of elk habitat security suggested by the literature, internal US Forest Service (USFS) planning documents, and joint USFS/MFWP recommendations regarding elk habitat protection and management.

MFWP believes that adoption of Alternative 4, as written, would also locally degrade other sensitive wildlife species habitat on the LRD. The following are our specific objections to the Preferred Alternative 4.

SPECIFIC MFWP OBJECTIONS

OBJECTION 1:

THE PROPOSED ROGERS PASS MOTORIZED LOOP TRAIL NORTH OF MONTANA HIGHWAY 200 IS WITHIN THE GRIZZLY BEAR RECOVERY ZONE/PRIMARY CONSERVATION AREA (PCA) AND MAY CONFLICT WITH INTERAGENCY GRIZZLY BEAR COMMITTEE GUIDELINES (IGBC 1986)

Issue: The new motorized connective trail and access trailhead/parking lot near Rogers Pass is within the Grizzly Bear Recovery Area/PCA, will degrade grizzly bear habitat there, appear inconsistent with IGBC habitat management guidelines, and may threaten statutory recovery and delisting.

Preferred Alternative 4 includes plans for a motorized trailhead/parking lot and a connective trail route north of Rogers Pass. The trailhead will be designed specifically for motorized trail users to park with trailers. The site will allow for multiple vehicles, provide a toilet and offer increased year-round access

Note--the Mike Horse Drainage is also important grizzly bear habitat, as described in the Draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013). However, because of its long history as a mining district, checkerboard ownership, and the fact that the drainage's northern aspect and heavier timber offer more security and hiding cover for wildlife, it is the more appropriate site for a connective trail into Willow Creek via Whiskey Gulch. The USFS should be aware that the large open ridges on the east side of Willow Creek are used intensively by grizzlies, and the area may soon qualify as a Grizzly Bear Biological Activity Center.

OBJECTION 2:

THE PROPOSED STONEWALL MOUNTAIN OHV TRAIL/PARKING LOT CONSTRUCTION/RECONSTRUCTION IS WITHIN THE GRIZZLY BEAR RECOVERY ZONE AND APPEARS TO CONFLICT WITH ESTABLISHED HABITAT STANDARDS UNDER THE INTERAGENCY GRIZZLY BEAR COMMITTEE GUIDELINES (IGBC 1986)

Issue: The proposed motorized Stonewall Mountain OHV trail (#417)/parking lot construction/reconstruction is within the Grizzly Bear Recovery Zone/PCA, likely conflicts with IGBC grizzly bear habitat management guidelines, and may threaten statutory recovery and delisting.

The Preferred Alternative 4 proposes the construction of a new motorized trailhead/parking area and the reconstruction of an OHV trail that would enhance access to the Stonewall Mountain area (Trail 417 and parking lot 1821-B1-NEW). The trailhead parking area would facilitate significantly increased public access at the base of the mountain (parking for trucks and trailers, a public toilet), and the trail improvements are designed to encourage increased motorized use from the trailhead parking area and basin-wide motorized loop trail. This project is within the Red Mountain Subunit of the NCDE Grizzly Recovery Zone's Monture-Landers Fork Bear Management Unit (BMU), an area within which grizzly bear CORE habitat values are already degraded.

Designating Trail 417 as open to motorized use annually until 10/15 extends this disturbance into the fall period. High elevation areas around Stonewall Mtn. support stands of whitebark pine. During fall, bears are in hyperphagia and grizzlies in the Blackfoot Valley specifically select for nutritious whitebark pine seeds where they are available (Kendall 1983). Extending motorized disturbance into the fall season within high-elevation whitebark pine stands such as those on Stonewall Mountain further increases the route's likely harm to grizzly bears.

This new developed motorized recreational access appears to conflict with the Interagency Grizzly Bear Committee Guidelines (IGBC 1986) and the Draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013). These documents state that any major "developed site" construction within the Grizzly Bear Recovery Zone that is intended to accommodate public use and recreation is subject to "developed site standards" under the Guidelines. The intent of these standards is to limit the number of "developed sites" (such as ski areas, snowmobile play grounds, new motorized trail loop systems, and increased-capacity trailhead/parking lots) within the recovery area.

Suggested Remedy:

MFWP continues to recommend that the trail to Stonewall Mountain be closed, year-round, to public motorized access. Developments of this type within the Recovery Zone/PCA likely require an "application ruling" by the USFWS and, if approved, would also require a "corresponding reduction" such as the closure of a similar site or some other form of appropriate mitigation. If the LRD chooses to

delisting efforts. These described subunits will be maintained within the Draft Conservation Strategy (USFWS 2013).

The NCDE Red Mountain BMU subunit (including the Stonewall Mountain area) is currently the most degraded subunit within the Monture-Landers Fork BMU. The Red Mountain subunit does not currently meet any of the three 19/19/68 guidelines under the existing condition. Although implementation of Preferred Alternative 4 would somewhat decrease open road and total road densities and increase CORE, all of these values would fail to meet the 19/19/68 guideline under the Preferred Alternative.

The management objective for this subunit is to maintain or improve habitat conditions that existed as of 2011, while maintaining options for resource management activities at approximately the same levels that existed in 2011. CORE habitat standards dictate that road densities and developed sites should be kept at a minimum within the Red Mountain subunit, because increases in motorized road and trail use increase grizzly displacement and mortality risk. Management actions that increase motorized road and trail use and distribution are inconsistent with this resource objective.

This portion of the NCDE Grizzly Recovery Zone's Monture-Landers Fork BMU is already compromised as a result of the extended winter recreation use period (December 1--June 31) in Copper Bowls and two mineral mines (Cotter and McDonald Meadows). In addition, private lands to the south and east are likely to be developed in the future.

Suggested Remedy:

MFWP continues to recommend that the Trail 417 to Stonewall Mountain be closed, year-round, to public motorized access. Developments of this type within the Recovery Zone/PCA likely require an "application ruling" by the USFWS and, if approved, would also require a "corresponding reduction" such as the closure of a similar site or some other form of appropriate mitigation. MFWP strongly recommends that all seasonal motorized closure dates north of Highway 200 be compatible with grizzly bear CORE habitat values.

Issue: MFWP has consistently opposed increased motorized access to the Stonewall Mountain area.

In 2005 MFWP reviewed a scoping notice for a special use permit application to improve the Stonewall Mountain Trail 417 to allow for new radio communication equipment to be installed at Stonewall Lookout. Although MFWP formally supported these specific improvements to Lewis and Clark County's communications system, we made clear in our comment letter (20 May 2005) that the Department was concerned that the area was within an Inventoried Roadless Area (IRA), within the Grizzly Bear Recovery Zone, and was important mountain goat habitat. MFWP recognized the need for occasional administrative site maintenance after the construction activity ceased but discouraged any additional future development of the site or trail.

In that same letter MFWP expressed concern with an amendment to the Forest Plan to identify Stonewall Mountain as an electronic site:

We are unclear as to whether this means that the amendment is needed solely to allow for this current permit, or does this mean that by allowing this current permit, the site would then be 'automatically' considered as a general electronic site, and therefore potentially open for other towers/uses by other agencies and/or public or private utilities? We are concerned about increased use of this area associated with this tower--and possibly others--and the long-term effects on wildlife.

The Terrestrial Wildlife section of the FEIS (Ch 3, pp 298-310) presents a comprehensive analysis of the effects of motorized recreation on grizzly bears. The Forest Service's own analysis appears to conclude that the proposed motorized (and bike trail loop systems) will degrade grizzly bear habitat.

Suggested Remedy:

Developments of this type within the Recovery Zone/PCA likely require an "application ruling" by the USFWS and, if approved, would also require a "corresponding reduction" such as the closure of a similar site or some other form of appropriate mitigation. If the LRD were to choose to proceed as described in Alternative 4, and the proposed trail developments are approved following USFWS consultation, MFWP would offer recommendations regarding necessary "corresponding reduction" opportunities. MFWP strongly recommends that all seasonal motorized closure dates north of Highway 200 be compatible with grizzly bear CORE habitat values.

OBJECTION 4:

THE MOTORIZED LOOP TRAIL AND BIKE TRAIL HAVE THE POTENTIAL TO IMPACT WILDLIFE

Issue: The Preferred Alternative 4 proposes to significantly expand a non-motorized bicycle trail system in the Blackfoot Valley's headwaters.

The Proposed Alternative 4 supports development of a "destination-quality" bicycle trail system that may have detrimental additive effects to wildlife security and wildlife habitat over time. The proposed trail developments include new trails in inventoried roadless areas, new connector trails, multiple trailhead parking lots, new trailheads and shuttle sites for mountain bikers.

MFWP expressed both support and concern for various bike trails when it commented on the DEIS. MFWP ultimately recommended Alternative 3 as our preferred alternative, with some reservations. We were specifically concerned with proposals to develop new bicycle trails in blocks of roadless habitat. Our previous comments made clear that an elaborate bicycle trail system had the potential to increase the impacts of human activity on grizzlies and other wildlife over time.

MFWP supports the enhancement of existing trails and roads to accommodate the use of bicycles but does not support constructing new bike trails on the north slope of Black Mountain. Much of this area is within an inventoried roadless area and is heavily used by grizzly bears.

MFWP is also concerned about constructing new bike trails along the south and north bench areas of Beaver Creek, and instead recommends that existing nearby routes be used for trails. In particular, the proposed trail includes Road 607-C1. This road system accesses a series of sensitive meadows that are used extensively by grizzlies. MFWP is also concerned that new trail construction along the ridge system between Baldy Mountain and Crater Mountain southeast of Lincoln might be detrimental to grizzly bears south of Highway 200

Suggested Remedy:

MFWP suggests that the Helena NF consult with the NCDE Grizzly Bear Subcommittee and USFWS to determine whether the proposed bicycle trail system will compromise grizzly bear delisting efforts. We also recommend further consultation with MFWP biologists before new trails are constructed so that they can be located away from sensitive wildlife habitat.

OBJECTION 5:

MFWP believes it is critically important that the Final Record of Decision (FROD) for the FEIS adopt a Blackfoot Travel Plan that is consistent with the draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013). The NCDE Conservation Strategies Team is currently preparing amendments to Forest Plans within the NCDE that may ultimately supersede travel planning provisions in existing Forest Plans. MFWP recommends that the HNF confer directly with the Conservation Strategies Team to ensure the final Blackfoot Travel Plan FROD is consistent with the Conservation Strategy.

Issue: The proposed Helmville-Gould motorized trail is within an Inventoried Roadless Area (IRA). Changing this IRA's designation, designating this trail as motorized, and constructing/reconstructing this trail to a high standard will significantly increase motorized use of the area and is inconsistent with the draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013).

MFWP agrees with the proposal to manage Trail 440 as a non-motorized trail in the Granite Butte RNA (Research Natural Area) Management Area N1 (or Granite Butte proposed Research Natural Area). However, we strongly object to the proposal to designate the Helmville-Gould Trail 467 as a motorized trail within the Nevada Mountain IRA. The amendment would allow for legal motorized traffic along the watershed divide of the Nevada Mountain IRA (a grizzly bear Biological Activity Center). As described in the draft NCDE Grizzly Bear Conservation Strategy (USFWS 2013), habitat protections in Zone 1 (including the Nevada Mountain IRA) should focus on maintaining and limiting miles of open roads and trails in current roadless habitat blocks, such as the Nevada Mountain IRA.

Grizzly bears living within Zone 1 are still considered to be part of the NCDE grizzly bear population. Habitat with special qualities and restrictions (such as the Nevada Mountain IRA) are important for grizzlies in Zone 1 and should be managed to maintain large blocks of habitat, with motorized use restrictions similar to those that existed in 2011. The Helmville-Gould Trail 467 is an "undesigned" trail under the current 1986 Helena Forest Plan (USDA 1986). Preferred Alternative 4 changes the status of the Nevada Mountain IRA and would significantly increase motorized recreational use of Trail 467.

Suggested Remedy:

MFWP strongly objects to the designation of the Helmville-Gould Trail 467 as a motorized route and recommends that it be formally designated a non-motorized trail. MFWP believes it is critically important that the Final ROD for the FEIS adopt a Blackfoot Travel Plan that is consistent with the draft NCDE Grizzly Bear Conservation Strategy. The NCDE Conservation Strategies Team is currently preparing amendments to Forest Plans within the NCDE that may ultimately supersede travel planning provisions in existing Forest Plans. MFWP recommends that the HNF confer directly with the Conservation Strategies Team to ensure the Final ROD for the Blackfoot Travel Plan is consistent with the Conservation Strategy.

Issue: The Helmville-Gould Trail 467 is not a legal motorized route under the current Helena Forest Plan (USDA 1986). Designating it as a motorized route, combined with proposed trail improvements, will significantly increase motorized use and resulting harm to wildlife.

The Preferred Alternative 4 proposes widening and reconstructing Trail 467 to accommodate OHV traffic July 1 through October 14. Alternative 4 has incorrectly described the Helmville-Gould Trail 467 as a motorized route; it is a user-created route considered "undesigned" in the current Forest Plan. This trail is within the Nevada Mountain IRA and should have been managed as a non-motorized trail for the last 28 years, consistent with the 1986 Forest Plan. Today, the trail receives moderate use by motorcyclists but it is impassible for OHVs along much of its length. The Helena National Forest has incorrectly tolerated motorized use of the trail for nearly three decades; this should not continue.

Controls over motorized recreation will be implemented where necessary to protect wildlife habitat values of this area (W-1 III/50; emphasis added).

The “Wildlife and Fisheries” subsection of the Management Standards for W-1 states:

Wildlife habitat improvement practices, including road management [sic], prescribed fire, and other techniques, will be used to maintain and/or enhance the quality of big game and non-game habitat (W-1 III/50).

Finally, when considering “Facilities” in Management Area type W-1, the following is stated:

- Roads will generally not be constructed for surface management activities within this area. . . .
- Road construction should avoid important big game areas. (W-1 III/52).

Under the Preferred Alternative, the proposed Trail 417 would be open to OHV and motorcycle traffic until 10/15 each year, and trail improvements are intended to increase motorized traffic. This proposal would effectively and significantly diminish big game security as defined in the HNF’s preferred Alternative B for Big Game Security Forest Plan Amendment (FEIS, Appendix F).

The area designated W-1 surrounding Stonewall Mountain--within which, under Preferred Alternative 4, the HNF proposes to construct and reconstruct a recreational OHV trail and trailhead to a high standard--is important habitat for grizzlies, big game, mountain goats, furbearers and other non-game wildlife. Construction/reconstruction of this trail, and the resulting associated increased use, wildlife disturbance and wildlife displacement that would inevitably result, appear inconsistent with Forest Plan direction for this Management Area type.

Suggested Remedy:

The Stonewall Mountain Trail 417 should be closed to public motorized use.

Issue: The proposed Helmville-Gould OHV trail reconstruction and trailhead construction appear to be inconsistent with the Helena Forest Plan.

The Preferred Alternative 4 proposes to reconstruct Trail 467 and designate it open to motorized use. This trail lies within what the HNF Forest Plan (USDA 1986) designates as Management Area type “W-1.” The explicit Management Goals for Management Area type W-1 are to (*emphasis added*):

- Optimize wildlife habitat potential, including old growth, over the long term.
- Provide for other resource uses, *if they are compatible with wildlife management goals*” (W-1 III/50).

The explicit “Management Standards” for Management Area type W-1 state, relative to “Recreation” subsection (*emphasis added*):

Controls over motorized recreation will be implemented where necessary to protect wildlife habitat values of this area (W-1 III/50).

The “Wildlife and Fisheries” subsection of the Management Standards for W-1 states:

an interconnected motorized trail system and a new access (trailhead) parking lot in Second Gulch will result in increased motorized activity over time, will diminish habitat connectivity, and will degrade important grizzly habitat within the Recovery Zone/PCA.

Suggested Remedy:

MFWP objected to the development of additional motorized trails near Rogers Pass when evaluating DEIS Alternatives 2 and 3 in 2013. MFWP continues to urge that portions of the connective trail within the Grizzly Bear Recovery Zone/PCA be rerouted along Highway 200 to an existing trailhead parking lot in Alice Creek alongside the highway.

Issue: The proposed Helmville-Gould Motorized Trail is within an Inventoried Roadless Area. Designating the Helmville-Gould trail as motorized, changing this IRA's designation, and encouraging increased motorized traffic will fragment high-quality habitat and habitat connectivity along the Continental Divide wildlife movement corridor.

Designating the Helmville-Gould Trail as motorized and encouraging additional motorized use would fragment secure habitat within an important grizzly bear Biological Activity Center and significantly reduce functional connectivity between the NCDE and expanding subpopulations of grizzly bears further south.

Functional habitat along the portion of the Continental Divide near Granite Butte is already severely compromised for many wildlife species due to existing motorized routes and private land in-holdings. MFWP recognizes that there is limited opportunity for wildlife habitat improvement in the immediate vicinity of Granite Butte. Preferred Alternative 4 proposes to maintain motorized access to the area north of the Stemple Pass Road. Similarly, designating the Helmville-Gould Trail 467 as motorized creates redundant motorized access to the area: the Stemple Pass and South Fork Poorman (Route 4134) Roads⁴ are only 1 to 3 miles away. In order to maintain connectivity for wildlife along the Continental Divide, habitat fragmentation should be reduced, not increased, in the area.

The Nevada Mountain IRA provides year-round functional habitat for wildlife (including lynx, wolf, grizzly and black bears, wolverine, elk, moose, and numerous non-game species), provides associated hunting and trapping opportunities on public lands, and provides critically important secure habitat for big game from both the west and east sides⁵ of the Continental Divide during the hunting season. East of the Divide, secure habitat on public land is minimal and is likely a limiting factor for bull survival.

Suggested Remedy:

The Helmville-Gould Trail should be formally designated as a non-motorized trail within the Inventoried Roadless Area. MFWP continues to recommend a 9/1 closure for seasonally open motorized routes in the area.

MFWP is also concerned with the Preferred Alternative's lack of adequate 9/1 road closures for Hogum Creek, roads west of Ogden Mountain, Sandbar Creek and Routes 1827 and 485, and, most importantly, the motorized designation and improvement of the Helmville-Gould Trail 467. In our 11 March 2013 letter (attached), MFWP recommended that Route 1827 along the crest of the Continental Divide close at Stemple Pass beginning on September 1; we reiterate that recommendation here. The proposed 10/15 closures, motorized trail designations within the IRA, and proposed improvement of Trail 467 described in Alternative 4 make it difficult for us to support the development of, and expected increase in, summer

⁴ Both open to "Highway Legal Vehicles."

⁵ Elk move with regularity between the east and west sides of the Divide. In the fall, the Nevada Mountain IRA is likely the secure habitat destination for some elk associated with the east slope during winter and spring.

harvest opportunity. The current status of each affected hunting district is presented at the end of this letter.

Neither public land populations nor bull ratios in the Lincoln valley have increased despite the near elimination of antlerless harvest opportunity and the adoption of spike-bull harvest restrictions. In contrast, the number of elk that spend the majority of the year on some nearby private lands has increased dramatically between 1986 and 2013. FWP has consistently urged the HNF to increase functional fall habitat security on the Lincoln Ranger District during the more than 5 years we have participated in the non-winter Travel Plan amendment process. Alternative 3 in the Blackfoot Non-winter Travel Plan DEIS (hereafter, Alternative 3) fairly represents FWP's recommendations.

MFWP went on to describe our rationale for recommending a new Big Game Security Amendment alternative that--if Travel Plan Alternative 3 were adopted--would sufficiently improve and protect fall big game security on the LRD.

Issue: Within the Travel Plan FEIS and Draft ROD, the analysis of overall elk population trend mischaracterizes the specific purposes of providing secure big game fall habitat. In reality these purposes should be to: 1) increase bull elk survival and 2) prevent the displacement of elk from public lands during fall hunting seasons.

The objective of a big game security standard is to ensure that adequate and well-distributed secure big game habitat is retained within Travel Plan EAUs. The correct measure of the standard's adequacy is not elk population counts or trend within MFWP hunting districts or FS Elk Analysis Units (as was used in Appendix F on: p. 152 para 5; p. 159; p. 165 "Correlation . . . and Elk Numbers"; p. 166 para 3; p. 168 para 1; p. 175 "A Modification . . ."; p. 176 "Summary and Conclusions" 2nd and 3rd bullets). Instead, provision of adequate and well-distributed secure public-land habitat is intended both to protect a defined proportion of bulls from harvest and to prevent the displacement of public elk from public lands during the fall hunting season.

Suggested Remedy:

FWP recommends that the Final ROD clarify that the specific purposes of providing big game security is to improve bull elk survival and to retain elk on public lands during the fall hunting seasons.

Issue: Within the Travel Plan FEIS and Draft ROD, the use of "Elk Herd Unit" and "Elk Analysis Unit" (or just, "Analysis Unit"), are incorrectly treated as equivalent; they are not (as was used in Appendix F on: p. 173 para 1-2; p. 174 "The Proposal . . ."; p. 175 "An Alternative . . ."; p. 177 2nd bullet). In addition, the term "Analysis Unit" is used to explain the "Hillis Paradigm" (Hillis et al. 1991) of elk security, but this term is not defined (Appendix F, p. 171 para 4). The interchangeable use of these terms leads to the inaccurate conclusion that the minimum "30% threshold" of secure habitat within a defined Elk Herd Unit would be met or increased under the Preferred Alternative 4 (Appendix F, p. 174).

MFWP worked with USFS biologists to define discrete year-round Elk Herd Unit boundaries that, in most cases, included both USFS and adjacent private lands. During later collaborative work to assist the USFS in developing an amended Big Game Security standard, MFWP recommended use of the concept of the Elk Analysis Unit, defined as "that portion of an Elk Herd Unit within the Forest Service administrative boundary," because we recognized that USFS planners could neither regulate nor control elk habitat management outside the National Forest administrative boundary and that private lands outside the administrative boundary are generally insecure.

delayed closure of Hogum Creek, Sandbar Creek and Route 1827, and, most importantly, the opening and improvement of the Helmville-Gould Trail 467 to heavy motorized use during the fall season. The lack of adequate closures and these changes under Alternative 4 make it difficult for us to support the development of, and expected increase in, summer motorized recreation in other areas of the Plan Area, where that activity is more appropriate. MFWP strongly recommends reconsideration of these proposals.

Suggested Remedy:

MFWP continues to recommend the implementation of Travel Plan Alternative 3, with certain adjustments, in order to provide and protect fall big game security on the Lincoln Ranger District (if done in conjunction with the adoption of Big Game Security Amendment Alternative B). This would ensure the improvement and protection of fall habitat security that agency collaborators intended during the Big Game Security Amendment's development (DEIS review stage).

In closing, MFWP reiterates our appreciation for this opportunity to enter into a collaborative discussion about these issues. We look forward to hearing from you, and toward the process points to follow.

Sincerely,

/s/ Randy Arnold

Randy Arnold
Region 2 Supervisor

/s/ Pat Flowers

Pat Flowers
Region 3 Supervisor

RA, PF/sr

C: Amber Kamps, District Ranger, Lincoln Ranger District
William Avey, Forester Supervisor, Helena National Forest

Encl: ~~MFWP letter (11 March 2013)~~ regarding the Blackfoot [Non-Winter] Travel Plan DEIS

~~MFWP letter (22 April 2013)~~ regarding the proposed Plan Amendment (Big Game Security Standard 4(a) of the Helena NF Forest Plan, 1986) for the Blackfoot [Non-Winter] Travel Plan DEIS

United States Fish and Wildlife Service (USFWS). 1993. Grizzly bear recovery plan. Denver, CO. 75 pp. http://www.fws.gov/mountain-prairie/species/mammals/grizzly/Grizzly_bear_recovery_plan.pdf Accessed 8 May 2014.

United States Fish and Wildlife Service (USFWS). 2013. Draft NCDE Grizzly Bear Conservation Strategy. 158 pp. http://www.fws.gov/mountain-prairie/species/mammals/grizzly/NCDE_Draft_CS_Apr2013_Final_Version_corrected_headers.pdf Accessed 4 May 2014.