Montana Fish, Wildlife & Parks

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LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE

3201 Spurgin Road
Missoula, MT 59804
May 20, 2004

Dear Interested Citizens:

Thank you for your thoughtful reviews and comments on a proposal by Montana Fish, Wildlife and Parks (FWP) to purchase approximately 3,834 acres from the Rocky Mountain Elk Foundation, at a price of $3.3 million. The subject lands are located about 7 miles west of Ovando, within the pre-existing Blackfoot-Clearwater Wildlife Management Area, in Missoula and Powell Counties.

Enclosed is a decision document in which FWP explains its rationale for recommending that the Fish, Wildlife and Parks Commission and the State Board of Land Commissioners approve this transaction as proposed. With the additions in this decision notice of information provided in response to issues raised during the public involvement process, FWP accepts the draft environmental assessment, socio-economic assessment, and management plan as final.

The decision document also displays all public comments on the proposed purchase, and explains how FWP considered and incorporated these comments in formulating a recommendation.

FWP will request approval for the purchase of the subject lands at the monthly Fish, Wildlife & Parks Commission meeting scheduled for June 10, 2004, at FWP headquarters in Helena. FWP will request approval from the State Board of Land Commissioners at its regularly scheduled meeting on June 21, 2004, also in Helena. These meetings are open to the public, as are other regularly scheduled Commission and Land Board meetings.

Please feel free to contact me at 406-542-5500 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Mack Long by JT

Mack Long
Region 2 Supervisor

DECISION NOTICE
Blackfoot-Clearwater Wildlife Management Area
May 20, 2004

Proposal

Montana Fish, Wildlife & Parks (FWP) proposed to purchase 3,834 acres from the Rocky Mountain Elk Foundation (RMEF), at a price of $3.3 million. FWP expects to reimburse its Habitat Montana Program in the amount of $3.3 million with a grant from the federal Forest Legacy Program in early 2005. Plum Creek Timber Company still owned the property when FWP released this proposal to the public in April 2004. Although it is located within the administrative boundary of the Blackfoot-Clearwater Wildlife Management Area (BCWMA), in Missoula and Powell counties, the land is not protected from the possibility of a future property sale and subdivision. This land contains the principal winter range for a migratory population of about 800-900 mule deer and forms an integral component of the larger winter concentration area for migratory populations of 900-1,100 elk and several-hundred white-tailed deer. FWP's purpose for purchasing the land is to manage important habitat for deer, elk and other wildlife, and prevent this habitat from being sold and subdivided for residential, commercial or industrial development. Upon assuming ownership, FWP would manage habitat to enhance forest and shrub-field forage for mule deer and elk. FWP would manage public access and recreation in keeping with traditional FWP practices on the BCWMA and in Hunting District 282.

FWP makes annual payments to the counties in lieu of property taxes on lands in its ownership. These payments are equal to the annual property taxes assessed to privately owned property. Therefore, this proposal would not result in a loss of property tax revenue to the counties.

Montana Environmental Policy Act (MEPA) Process

FWP prepared an environmental assessment pursuant to MEPA, and a management plan and socio-economic assessment pursuant to the 1987 act of the Montana legislature known as House Bill 526. FWP made these documents available during a 30-day public comment period that began on April 15 and ended on May 14, 2004. FWP advertised the public comment period

and the availability of the proposal documentation by a legal notice entitled PUBLIC NOTICE and verification of publication has been received from the *Seeley-Swan Pathfinder* (April 15, 2004), *Helena Independent Record* (April 15, 2004), *Missoulian* (April 15, 2004), *Montana Standard* (April 15, 2004), and *Great Falls Tribune* (April 15, 2004). FWP has not yet received verification of publication from the *Blackfoot Valley Dispatch*. A feature article on this proposal and opportunity for public comment was published in the April 15th issue of the *Seeley-Swan Pathfinder*. The documentation (EA, etc.) was available in its entirety on FWP's Internet web site (www.fwp.state.mt.us) for the full duration of the public comment period, beginning in the morning of April 13th. FWP distributed 118 hard-copies of the documentation immediately before the public comment period began, and responded to all additional requests for copies as they were received. Included in the initial mailing were all landowners with property adjacent to the proposed purchase, and the Missoula and Powell County Commissioners and Planning Boards.

A public hearing was held on the evening of April 28, 2004, at the Seeley Lake Community Center, about 8 miles from the proposed purchase area. This hearing date was advertised in the proposal documentation, in the legal notices and newspaper article listed previously, and on FWP's Internet web site. The content of the legal notice is attached.

Summary of Public Comment

Thirty-two (32) individuals and/or organizations participated in the public involvement process by commenting on the draft proposal and/or attending the public hearing. Eighteen (18) people attended the hearing, and 9 provided oral testimony when FWP offered the opportunity. FWP also received 17 written responses to the proposal (1 duplicative of the public hearing testimony), and 2 phone calls.

All testimony received at the public hearing was in support of the proposal, as were the phone calls. Of the 17 written comments received, 16 were in support of the proposed purchase and 1 letter pointed out shortcomings of the draft management plan. A transcript of oral testimony and copies of all written comments are preserved as an appendix to this decision

notice.

Corrections, Clarifications, and Updates to the Environmental Assessment

Following are issues or questions that came to light during the public involvement process, and information provided by FWP in response. This information should be considered as part of the final environmental assessment.

Current Land Ownership—On May 17, 2004, deeds were recorded that transferred the subject lands from Plum Creek Timber Company to The Nature Conservancy, and then to the RMEF. Therefore, the sentence on Page 2, Paragraph 1, of the draft EA, which reads *Plum Creek Timber Company currently owns the property,* is herein revised and updated to read that RMEF currently owns the property. This recent property transfer does not affect FWP's original proposal, which is *to purchase 3,834 acres from RMEF* (Page 2, Paragraph 1).

Reimbursement from the Forest Legacy Program—FWP received clarification from the U. S. Forest Service during the public involvement period that FWP must wait until federal fiscal-year 2005 to spend FWP Habitat Montana funds in order to remain eligible for reimbursement from the Forest Legacy Program in fiscal-year 2005. Federal fiscal-year 2005 is October 1, 2004 through September 30, 2005. Therefore, the sentence on Page 15, Paragraph 1, of the draft EA, which reads *[FWP] would purchase the subject lands from RMEF in June 2004,* is herein revised and updated to read that FWP would purchase the lands from RMEF on or after October 1, 2004. This correction will not affect the probability of project completion because RMEF has agreed to this revised timeline for selling the land to FWP.

Threatened and Endangered Species—FWP mistakenly wrote in the draft EA that *peregrine falcons are currently classified as threatened in Montana* (Page 18, last paragraph), and discussed potential impacts to lynx under the heading of Sensitive Species (Page 19, Paragraph 1). These are corrected as follows. The peregrine falcon in Montana is not classified as threatened or endangered by the U. S. Fish and Wildlife Service (USFWS), but is classified by FWP and the Montana Natural Heritage Program as a species of concern. The Canada lynx is

classified as threatened in Montana by the USFWS. The assessments of potential impacts to peregrine falcon and Canada lynx remain accurate as originally written in the draft EA.

Forest Management—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *MFWP has not always exhibited the best record of forest stewardship or recreation management on the State lands they've been entrusted with.*

FWP Response—As with any other landowner, FWP's land management is a work in progress. We can point to numerous examples of active and sustained habitat and property management on FWP lands that meet or exceed FWP objectives, and we can point to others that are awaiting time, funding, or priority for improvement. FWP is unaware of the particular "record of forest stewardship or recreation management" that you refer to, so we have no opportunity to respond more specifically. However, with your indulgence, your comment does raise a concern on the part of FWP that its charge for owning and managing wildlife habitat under the Habitat Montana Program may be misunderstood. In our lexicon, your use of the terms "State lands" and "entrusted" brings to mind the Trust lands that were granted to the state under the federal Enabling Act, and are managed by a different agency—the Department of Natural Resources and Conservation—to generate revenues for the schools and other trusts. Perhaps you did not intend this. Still, it seems worth repeating that the funds specific to this proposal are legislatively earmarked only for the acquisition and maintenance/enhancement of wildlife habitat. Certainly, "forest stewardship" and "recreation management" are integral to the management of wildlife habitat, but appropriate stewardship in a forest being managed for the maximum sustainable flow of timber will often look different than equally appropriate stewardship in a forest being managed first and foremost for wildlife habitat. Similarly, "recreation management" strategies differ according to the primary objective.

Forest Management—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *We recognize the budgetary constraints you deal with, however, this is a large tract of land that will require a good deal of funding to combat noxious weeds, manage public recreation, maintain roads, and properly maintain forest health. Your desired acquisition*

includes almost 4,000 acres above and beyond the acreage you already have in the BCWMA. Forestland grows and changes rapidly and even the proposals for prescribed burning will be costly. Do you have a long-range management strategy and budget to prepare you for the task that lies ahead? Will you be able to maximize public access and recreation opportunities?

FWP Response—This issue is central to FWP's proposal. Let's begin with the easiest part—public access and recreation opportunities. FWP has managed public access and recreation opportunities on the subject lands since 1949, by way of cooperation with the Anaconda Company, then Champion International Corporation, and finally Plum Creek. So, FWP's purchase of the subject lands will result in no change from the long-standing access and travel management plan that was disclosed in full on pages 5 and 6 of the draft management plan, and depicted on the map that was attached to the plan. Similarly, FWP (in partnership with Plum Creek) has already incorporated roadside spraying and annual helicopter treatments of leafy spurge patches on the subject lands into its maintenance budget. Expenses for road maintenance and forest management will be new to FWP on the subject lands. Legislatively earmarked funding is available (on a prioritized basis) in FWP statewide accounts for new road maintenance and forest management projects, as needed. Constraints will be manifested mostly in the amount of work that can be budgeted for any given year, rather than the amount of high-priority work that can be budgeted at all.

Human/Wildlife Conflicts—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *According to the EA, wildlife numbers have increased dramatically since the 1948 creation of the Blackfoot-Clearwater Wildlife Management Area. Additional security would likely increase that trend. What are your management goals for dealing with human/wildlife conflicts? How will you address the roadkill situation along State Highway 200?*

FWP Response—The proposed purchase of lands that are already included within the administrative boundary of the BCWMA will not increase wildlife numbers or human/wildlife conflicts. Security (from human disturbance) will not increase appreciably with the continuation of the pre-existing plan for public access and vehicular access. However, the proposed purchase

will allow FWP to maintain the status quo by preventing the eventual sale and residential or recreational development of this important habitat. The very existence of the BCWMA minimizes human/wildlife conflicts by addressing the public's desire for wildlife and wildlife-based recreation on strategically located lands that are owned by the appropriate public agency. Conflicts between elk and private ranching operations occur primarily during the spring migration. Numbers of elk and other game animals are controlled by hunting in a manner that attempts to strike a balance between the public's wildlife resource and private property rights. FWP is in the process of redrafting its statewide elk management plan, which will provide the public with a chance to input on revised objectives for elk management on the BCWMA, and elsewhere, later this year. FWP is in the process of reducing elk numbers in the BCWMA population by about 20% over the next 2-3 years to meet anticipated objectives for this area. In cooperation with FWP and neighboring residents, the Montana Department of Transportation recently installed new Wildlife Crossing signs on Highway 200 to warn motorists about deer and elk on the highway.

Economic Impact—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *One of our concerns is the economic impact of transferring this land from private ownership to government management. If future profits acquired from managing the intended acquisition won't benefit the Trust, and timber management is no longer the priority on the acquisition acreage, there will undoubtedly be a loss of economic benefit to the community, local businesses, and schools. In Appendix B this impact is said to be minimal but admittedly negative. That may be true for this 3,834 acres, however, combined with changes in management strategies on the other large acquisitions of Plum Creek Land through the Nature Conservancy and Rocky Mountain Elk Foundation, and the economic impact is huge for the Seeley and Missoula areas.*

FWP Response—FWP acknowledges the facts and perceptions you have brought to light. However, your analysis must be based on the assumption that a steady flow of timber products would be generated in the future from Plum Creek lands, were it not for the purchase of land proposed by FWP on the BCWMA, and those purchases already underway by The Nature

Conservancy and the Blackfoot Challenge in the upper Blackfoot watershed. FWP respectfully disagrees. FWP would not have initiated the 50th Anniversary Project to bring Plum Creek inholdings within the BCWMA into public ownership if reasonable assurance existed that the dominant future land use would be timber production. This statement is supported by the fact that FWP has been able to meet objectives for elk, mule deer, and white-tailed deer populations on the BCWMA historically, with inholdings in corporate ownership. But, every indication is that these lands will not remain available for timber production under the no-action alternative.

In the past 10 years, FWP has noted an accelerated pace of timber harvest on Plum Creek timberlands on the BCWMA and across the Blackfoot watershed. Near-term timber value has been harvested at a landscape scale, rather than on a unit-by-unit basis, increasing the probability that timber regeneration and growth cannot keep pace in these local areas. Parcels of Plum Creek timberlands in the Blackfoot valley, including some leased within the BCWMA, have been marketed, sold, and subsequently subdivided, and this trend is continuing as a routine part of Plum Creek's business plan (as indicated on Plum Creek's Internet website). Plum Creek inholdings within the BCWMA provide prime sites, with expansive views, for residential or recreational development. This factual information forms the basis of FWP's economic analysis; i.e., that the subject lands and other Plum Creek lands in the upper Blackfoot will not contribute appreciable timber revenue to the economy over the next 30-50 years, even if retained in Plum Creek ownership, and that the most probable scenario for the BCWMA subject lands in the future—under the no action alternative—is the conversion of wildlife habitat and timberland to subdivision and development. We suggest that FWP's purchase of Plum Creek land within the BCWMA will not cause the economic impacts that you illuminate, but rather is one proactive and appropriate response to mitigate impacts that have already occurred. Therefore, the proposed project will not contribute to a negative cumulative impact on local economies.

Need for Vegetation Manipulation—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *There must be vegetation manipulation if this area is to retain or acquire the wildlife qualities that it is being purchased for. Wildlife managers must begin to recognize and talk about these benefits.*

FWP Response—Thank you for your comment.

Additions and Clarifications for the Management Plan

Recruiting Large, Old Trees—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *On page 7, where you discuss timber harvests that are limited only to prescribed treatments for the next 20 years that would enhance growth rates and recruitment of old ponderosa pine, larch, and Douglas-fir……you must be more specific. Recruiting large old trees will require wide tree spacing to achieve; likely 30 feet or more between trees if you wish to maximize growth rates so that you have large trees within 60 years instead of 200! Describe the diameter or size of a "large old tree" so there is a clear idea of what you are trying to achieve.*

FWP Response—A large, old tree in this case would be greater than 200 years old and greater than 30 inches diameter-at-breast-height. Such trees will be valuable wildlife habitat not only while alive, but also as snags when they die. Smaller snags are less valuable as nest trees. Basically, there are 5 general stand conditions across the subject lands. One (comprising about 700 acres) was burned in the 1991 wildfire, and consists of virtually zero basal area on dry sites, with clumps of planted seedlings just now establishing themselves. A second (comprising about 1,000-1,200 acres) has been intensively cutover in the past 10 years, and consists of sub-merchantable healthy and defective trees, generally at greater than 30-foot spacing, with relatively sparse and widely scattered regeneration. A third (comprising about 600-800 acres) was less intensively harvested in the past 10 years, and consists of an increased number and density of poles and young mature trees, with clumps less than 30-foot spacing. A fourth (comprising about 500-700 acres) has not been harvested in the past 10 years, and is dense, mature Douglas-fir, larch, spruce, and ponderosa pine on steep slopes and draws. The fifth (comprising about 500-600 acres) is pole-sized larch regeneration in a 25-year-old clearcut. The remainder is wetlands, riparian, roads, landings, and the like.

From the above description, our near-term needs for managing tree spacing to recruit large, old trees are limited in extent and urgency. First priority will be to maintain good growth and health in the pole-sized, even-aged larch. Research by Rick Ward on the BCWMA (1999)

has indicated that large larch are an important substrate for the production of hanging tree lichen, a preferred winter forage for bull elk and mule deer in the specific sites we are considering here. Dense, mature, overstory canopy is also a good predictor of lichen production. Therefore, the objective on this site will be a mixed stand of large larch and Douglas-fir. FWP will consult with foresters from the Montana Department of Natural Resources and Conservation (DNRC) on any thinning needs and prescriptions over the years, based on periodic field inspections of the larch stand. Provision must be made in the more-distant future for regenerating the next cohort of larch, which will eventually require larger openings in the canopy.

Second priority will be to build upon the attributes that the former owners left for us in the "third" stand condition, described above. In the near-term, this will involve identification of individuals or small stands of recruits that exhibit the characteristics for surviving to old age. We anticipate that such trees would average 2-4 per acre across the 600-800 acres of this condition on the subject lands. Any emerging insect or disease problems in these selected sites should be addressed with directed sanitation harvests as needed. Needs for releasing any of these individual trees from competition may be incorporated into the first joint FWP-DNRC timber sale on the BCWMA, which we anticipate in the next few years. The resulting managed stand condition will be uneven-aged, with a mosaic of dense and open understory, and small openings around the bases and crowns of large, actively growing, snag-recruits.

A similar approach may be taken in the "fourth" stand condition, described above, but with reduced priority and at much reduced scale than that described for the "third" stand condition. This generally north-facing slope is important for solitary bull elk in winter, and we observe decreased elk use of this forest type when units have been thinned. The dense overstory canopy and multi-storied character of the unthinned stands is now unique among forest types on the BCWMA, and quite limited in its distribution. Still, there may be habitat value and opportunities for managing competitive vegetation around the largest, actively growing, snag-recruits when they occur on gentle, accessible terrain. Similarly, a strategy of creating small openings (~1 acre each) of gradually increasing number over several decades may be appropriate for regenerating this general stand condition over time. Again, FWP will consult with

professional foresters at DNRC for site-specific information and issues.

Over a period of many decades, in cooperation with the major neighboring landowner, DNRC, forest stands should be brought into a condition where they can be regenerated at a landscape scale, rather than on a stand or site basis. Currently, the forest is severely fragmented by harvests that occurred along property lines, without cooperation. Therefore, owners of remnant cover patches are placed in the biologically difficult position of trying to regenerate new stands in the same location where old-stand characteristics are still critically important to a variety of wildlife. Likely, this would prove to be an undesirable approach for the overall health of forest communities in the long-run. Cooperation with DNRC on the BCWMA, as described in detail in a previous environmental assessment and environmental impact statement (please contact FWP, Region 2, 406-542-5500 for copies), provides FWP and DNRC with improved opportunity to manage forests at a landscape scale, for greater long-term ecosystem and economic benefit. This vision cannot be fully implemented until intensively cutover stands regenerate and begin to contribute the structural characteristics we need on appropriate sites to replace those existing structural attributes that would be temporarily lost in regeneration harvests. As mentioned above, and in the draft EA, FWP will use silvicultural techniques to shape stand recruitment processes at a smaller scale in the meantime.

Recruiting Large, Old, Trees—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *The Management Plan also states that prescribed timber harvest might be appropriate on some sites to avoid the risk of losing cover to stand replacement fires in the future. This should be a given for ALL of your sites!!! Why isn't it? The words "might be appropriate" must be changed to "will occur....."*

FWP Response—To be precise, FWP stated in the Management Plan that "Prescribed timber harvests might also be appropriate on some sites to manage (emphasis added) the risk of losing a high proportion of recruited cover to stand replacement fire in the future" (Page 7, bottom paragraph). I would not intend to use the term "avoid the risk," as you paraphrased it. It is virtually impossible to fire-proof a forest, but it certainly is possible to manage the risk of high-

intensity burns. There are forest types and forest stands that are naturally adapted to stand replacement fire. Such stands also support overstory and understory stand characteristics that are important for certain wildlife communities, which also serve as fuel ladders, ultimately leading to a heightened vulnerability of stand replacement by one or a combination of natural processes. To remove fuel ladders across the entire forest landscape is to remove communities of wildlife that evolved with them.

FWP's use of silvicultural treatments to manage fire risk on the subject lands will be directed toward three specific issues. First, FWP will continue to cooperate and collaborate with DNRC, and the Clearwater Resource Council in Seeley Lake, to address particular areas of concern from the standpoint of wildfire hazard reduction, property protection, and human safety. To date, stand conditions on the BCWMA have not been identified as an important fire hazard to surrounding communities. Second, FWP will assess the overall pattern of dense forest cover that is needed by white-tailed deer, and occasionally by elk and mule deer, on the BCWMA winter range, and devise a strategy of forest management that might help buffer the most critical cover patches from stand replacement fire. This will likely result in small, site-directed prescriptions similar to the type described above in response to your previous comment. Third, FWP will consider thinning fuel ladders in the immediate vicinity of large old trees and selected recruits to improve their chances of survival in case of wildfire. This strategy would also be met by implementing the treatments described above in response to your previous comment. Implementation of these strategies will be feasible, will maintain FWP forests in a condition that meets community goals for wildfire risk management, and will not sacrifice beneficial stand characteristics for the public's wildlife.

<u>Forest Management</u>—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *Page 8 states that MFWP expects to prescribe little or no forest management on the subject lands in the near future. We recognize that the subject lands are currently under Plum Creek Timber Company ownership and would assume that a low stocking level is your rationale for doing little or no forest management in the near future. What are your plans for management beyond that time frame? Will forest restoration efforts take place outside of the 6-month window*

that public access is allowed within the BCWMA?

FWP Response—Previous responses in this decision notice are pertinent, and will not be repeated here. Forest management may occur either during or outside of the 6-month window that public access is allowed within the BCWMA. Advantages of working during the public access period include dry surface conditions in the summer and no disturbance of wintering wildlife. Advantages of working outside the public access period include temporarily increased availability of lichen in fallen tops for wintering elk and deer, frozen ground/snow to limit surface disturbance, and increased public safety. FWP will make these decisions on a case-by-case basis.

MEPA Compliance—Concern was raised as follows by F. H. Stoltze Land & Lumber Company: *If MFWP is planning to manage the lands in cooperation with DNRC through the MEPA process as you are doing on other portions of the BCWMA, then the Draft Management Plan as it is written now, will leave you vulnerable to much speculation under MEPA law. If you adhere to DNRC's guidance for Trust Land Management, where will proceeds/profits from forest management go? Will they benefit the School Trust or be used for another purpose?*

FWP Response—The draft EA and Management Plan analyze the potential effects of FWP's proposed purchase of land. As you have pointed out, they do not attempt to analyze potential effects of any specific forest management plan. FWP disclosed in the Management Plan that "any proposal for using commercial or precommercial timber harvests to accomplish FWP objectives on the subject lands would be thoroughly described and analyzed in an environmental review process with public participation (i.e., MEPA)" (Page 8, Paragraph 2). When timber harvests on the subject lands are conducted in cooperation with DNRC under the terms of the recently signed Management Plan between the two agencies, then "proceeds/profits" will go to the School Trust in lieu of trees that DNRC leaves standing in critical wildlife habitats within harvest units on their neighboring land. Otherwise, income from management activities on FWP lands is deposited in a FWP trust account that is used to generate funding for maintenance and enhancement of those collective lands.

Decision

Utilizing the environmental assessment and public comment, a decision must be rendered by FWP that addresses the concerns and issues identified for the proposed purchase of wildlife habitat. In light of public comments and internal agency review, we accept the draft environmental assessment, management plan and socio-economic assessment as final, with the corrections and addition of information provided herein.

For reasons explained below, I have selected the proposed action as the alternative that best meets the mission and project objectives of FWP. Based on an evaluation of impacts to the physical and human environment, under MEPA, the proposed action is not a significant action; therefore, an environmental impact statement is not a necessary level of review.

The decision to complete the 3rd and final phase of the 50th Anniversary Project on the Blackfoot-Clearwater Wildlife Management Area is made easy by the wide and diverse array of public support that has grown over the past 5 years. The project was conceived in 1998 by the BCWMA Citizens Advisory Council, representing the interests of neighbors, ranchers, hunters, outfitters, businesses, agencies, and elk researchers. Council sought and gained the support of FWP, the Fish, Wildlife & Parks Commission, and the Rocky Mountain Elk Foundation (RMEF) early on. From there, an enabling partnership was formed, consisting of Plum Creek Timber Company, FWP, RMEF, Five Valleys Land Trust, DNRC, the Lolo National Forest, the Bureau of Land Management, and the Advisory Council. Fundraising for the Phase 1 purchase of the first 856 acres was spearheaded by local volunteers of the newly formed Blackfoot-Clearwater Chapter of the RMEF, in Seeley Lake, and joined in full by the Five Valleys (Missoula) and Flathead Valley (Kalispell) Chapters in particular. A record-setting $600,000 was contributed by hundreds of individuals and businesses, which was matched by $500,000 from the FWP Habitat Montana Program in 1999-2000. The Phase 2 land exchange between DNRC, FWP and Plum Creek, and the subsequent conservation easement and management plan for DNRC lands on the BCWMA, set a new standard for interagency cooperation in property and vegetation management for mutual benefit. RMEF funded timber cruises and appraisals for the Phase 2

land exchanges, and the timber cruise to support the FWP-DNRC land exchange was donated by Mr. Don Wood, of Seeley Lake.

Phase 3—this final piece of the 50th Anniversary Project—engaged additional partners across the Blackfoot and Clearwater watersheds. Initially, Plum Creek and the Lolo National Forest worked with the assistance of RMEF and FWP to develop a land exchange that would bring the remaining inholdings into Forest Service ownership. Before a specific proposal could be developed, a preferable opportunity emerged for FWP to acquire the inholdings in fee-title. This opportunity came about through the collaborative efforts of The Nature Conservancy (TNC) and the Blackfoot Challenge, an organization of diverse and numerous private landowners and agencies in the Blackfoot watershed. The Challenge, through a process of grass-roots community involvement, identified the Phase 3 lands on the BCWMA as one of the highest priority Plum Creek properties in the Blackfoot Valley to protect from potential conversion to subdivision and development. Subsequently, the Phase 3 lands were included in the larger effort by Plum Creek, TNC, and the Challenge to assure the continuation of traditional land uses on Plum Creek lands in the upper Blackfoot watershed. Following is a press release regarding the latest purchase of Plum Creek lands by TNC and the Challenge:

Contacts:
Tina Bernd-Cohen, Blackfoot Challenge, 406-442-4002
Tana Kappel, The Nature Conservancy, 406-388-1232

Blackfoot Community Project secures second installment of timber land
Purchase will aid Blackfoot-Clearwater Game Range consolidation

Helena, MT *-- The Nature Conservancy, acting on behalf of the Blackfoot Challenge, has finalized the purchase of 19,883 acres in the Blackfoot Valley, which is the second of three purchases planned this year as part of an agreement announced last fall with Plum Creek timber company.*

The purchase includes 3,835 acres of inholdings within the Blackfoot Clearwater Wildlife Management Area, and is a major step towards consolidating those parcels under Montana Fish, Wildlife and Parks ownership.

As part of the overall project, the Conservancy purchased 18,443 acres from Plum Creek in January, and by the end of the summer, will have purchased a total of almost 42,927 acres. The Conservancy will hold these lands temporarily while the Blackfoot Challenge, a collaborative group of local landowners, works out a community-based plan for their re-sale. The lands will be sold and "managed in a way that supports the community's rural and conservation values," said Stone.

"This project is an amazing undertaking for us and our partners, one that is consuming thousands of hours in planning and community meetings says Jim Stone, chairman of the Blackfoot Challenge and Ovando area rancher. "We're pleased at the high level of community involvement, because it will shape the future of ranching, forestry, wildlife and public access in this area."

A high priority for the community has been to consolidate ownership of the Blackfoot Clearwater Wildlife Management Area. To accomplish this, the Rocky Mountain Elk Foundation, which has a history of supporting the game range, will immediately purchase the Plum Creek inholdings from the Conservancy. RMEF will hold them until Montana Fish, Wildlife and Parks, which owns the surrounding 67,000-acre-game range, receives funding and approval to purchase them. The Bush administration's '05 budget has earmarked about $3.3 million in funding for the agency to complete the project. The agency hopes to complete the purchase this fall, said Mike Thompson, wildlife biologist with Montana Fish, Wildlife and Parks. "Lots of people have worked a long time to see this day. It's great for the wildlife of Montana."

More than 1,000 elk spend winters on the game range, which is Montana's largest state-owned property dedicated to wildlife habitat.

"We're pleased to be involved in consolidating this very important habitat, and to be part of the overall effort aimed at maintaining the rural character and natural resources of the Blackfoot Valley," said Elk Foundation President and CEO, Peter J. Dart.

Other lands being purchased as part of the Plum Creek-Blackfoot Community Project not only provide critical wildlife habitat, but have also been important for recreation, forestry and ranching.

Discussions are also underway with the Bureau of Land Management and the Forest Service as possible buyers for some of these first- and second-phase lands, since these agencies own adjacent properties.

"Valley residents have consistently expressed their desire for public access that they enjoyed as part of Plum Creek ownership. So, it makes sense to see some of these lands go into public ownership," said Stone.

Many of the lands in the project will also be sold to private buyers. The Challenge is still working out the details for the disposition of specific project lands.

The latest round of purchases also includes 7,659 acres of critical wildlife habitat in the Alice Creek area. Grizzly bears and elk frequent this heavily timbered area along the Continental Divide as they travel south out of the Scapegoat and Bob Marshall wilderness areas.

Another high priority area is Ovando Mountain, a prominent mountain in the valley's center where local residents would like to see a community-managed conservation area. The first round of Conservancy purchases last January included 9,629 acres along the lower slopes of the mountain that would be included in this project. The details of this project are still being worked out.

"The input we've received is that people would like to see this area managed for conservation of wildlife habitat, sustainable forestry, grazing and public recreational access," said Stone.

The next round of purchases, which will include about 4,600 acres in the Marcum Mountain and Nevada Creek areas, is expected in mid-August. If all goes as planned, over the next several years the Conservancy could purchase a total of 88,000 acres of Plum Creek lands, and re-sell them with conservation safeguards.

"This project has been inspired by some amazing community leaders who have a long history of conservation in the valley," said Jamie Williams, state director of the Conservancy. "We're honored to support them in this remarkable effort to conserve the wildlife habitat and rural values that make the Blackfoot Valley so special."

"It's gratifying to have the strong support of Montana's congressional delegation, local citizens and public officials who are all working together on this exciting project," added Stone.

Public involvement specific to the draft EA, Management Plan, and Socio-Economic Assessment for FWP's proposed purchase of the Phase 3 lands from RMEF has reinforced our confidence that the proposed action is well conceived and supported. The proposal was widely advertised across Montana, and especially well known in the Blackfoot and Clearwater valleys. The 27 individuals and organizations that were represented by public comment are from diverse

backgrounds. Of particular note is a letter of support from the Clearwater Resource Council, a group of forestry professionals and interested citizens in Seeley Lake who have formed to refine and implement the concept of "healthy forests," among others, in the Clearwater Valley. FWP also appreciated the thoughtful and challenging comments and questions on FWP's forest management plans from F. H. Stoltze Land & Lumber Company. We gained even greater confidence in the basis for this proposal after developing the responses to their questions (see excerpted comments and responses in the previous section of this decision notice). For all of the public awareness and interest in this proposal, no comments were received in opposition.

The 50th Anniversary Project will be one that benefits Montanans for generations after it is long forgotten. For that reason, the 50th Anniversary Project was selected by FWP as one of its Centennial Projects, commemorating the first 100 years of FWP service to the people and resources of Montana. And, for that reason I proudly recommend that the Fish, Wildlife and Parks Commission and State Board of Land Commissioners complete the 50th Anniversary Project, as proposed.

Mack Long by JT.

Mack Long
Region 2 Supervisor
Montana Fish, Wildlife & Parks

5/21/04

Date

AFFIDAVIT OF PUBLICATION
THE GREAT FALLS TRIBUNE
205 RIVER DR S
GREAT FALLS, MT 59405
Phone: (406) 791-1444
Toll Free (800) 438-6600

Terri VanLieshout, being first duly sworn deposes and says that GREAT FALLS TRIBUNE COMPANY is a corporation duly incorporated under the laws of the State of Delaware, that the said GREAT FALLS TRIBUNE COMPANY is the printer and publisher of the GREAT FALLS TRIBUNE, a daily newspaper of general circulation of the County of Cascade, State of Montana, and that the deponent is the principal clerk of said GREAT FALLS TRIBINE COMPANY, printer of the GREAT FALLS TRIBUNE, and that the advertisement here to annexed...

PUBLIC NOTICE

Has been correctly published **ONE** time in the regular and entire issue of said paper on the following dates:

APRIL 15TH 2004

Terri VanLieshout

STATE OF MONTANA
County of Cascade

On this **16TH** **of APRIL 2004,** before me the undersigned, a Notary Public of the State of Montana, personally appeared Terri VanLieshout, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same.

In witness whereof, I have hereunto set my hand and affixed my Notarial Seal the day and year first above written.

Becky Keith
Print Name

Becky Keith
Signature
NOTARY PUBLIC for the State of Montana
Residing in Stanford
My commission expires: [illegible]

PUBLIC NOTICE

Montana Fish, Wildlife and Parks (FWP) invites the public to comment on its proposal to purchase the final 3,834 acres of private inholdings within the Blackfoot-Clearwater Wildlife Management Area (BCWMA), at a price of $3.3 million. If implemented, this proposal would complete the 50th Anniversary Project, which was begun in 1999 with the goal of bringing some 7,800 acres of Plum Creek Timber Company inholdings into FWP or other public ownership in a series of phased transactions. FWP's purpose for purchasing the land is to ensure the continued availability of important winter range for elk and deer populations by preventing the possibility of future residential or other development within the BCWMA.

A Draft Environmental Assessment (EA) will be available for review and comment beginning Thursday, April 15, 2004. You may obtain a copy electronically at the FWP website *(http://www.fwp.state.mt.us)*, or by contacting Mike Thompson, FWP, 3201 Spurgin Road, Missoula, MT 59804, phone 406-542-5500, e-mail mthompson@state.mt.us

Comments must be directed to the mail, phone, or e-mail address listed above, and must be received or postmarked no later than May 14, 2004. A public meeting to discuss the proposal will be held at the Seeley Lake Community Center on April 28, 2004, at 7:00 P.M.

(160641)

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

SIGN IN SHEET

~~~~PLEASE~~~PRINT~~~CLEARLY~~~~

****

NAME	ADDRESS	DO YOU WISH TO SPEAK?
MIKE WILLIAMS	Box 564 AUGUSTA MT 59410	NO
Bruce Wold	Box 570 Seeley Lake 59868	NO
TRENT TOMS	" 1317 " " "	YES
JOHN & PAMELA KELLER	1350 SUMMIT PARK SL 59868	NO
Jim Stone	P.O. Box 148 Ovando, MT 59854	NO
John Locke	8011 E. 104th TERR. KCMO 64134	NO
Jack Rich	Box 495 Seeley Lake	
Rena Heaton	PO Box 22 Seeley Lake	
Wayne Heaton	PO Box 22 Seeley Lake	
Ty Heaton	PO Box 22 Seeley Lake	

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

SIGN IN SHEET

~~~~PLEASE~~~PRINT~~~CLEARLY~~~~

****

NAME	ADDRESS	DO YOU WISH TO SPEAK?
JOHN RICHARDS	Box 870 SL	?
KEITH LEONARD	5455 SKYWAY MISSOULA 59804	?
DARRELL GRAHAM	Box 813 Seeley Lake, MT 59868	No
DEBBY DILS	TWP	NO
VIRGIL WINKLER	P.O. Box 1277, SL	No
DWIGHT JENKINS	P.O. Box 111 Seeley Lake	No
BONNIE WASSON	PO Box 492 SEELEY LAKE 59868	
Ron Bohlman	POB 1279 " " "	No
CHRIS LORENTZ	POB 61 SL 59868	No
Ed Lamb	Box 446 SL 59868	No
~~~~

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA
APRIL 28, 2004
PUBLIC COMMENT

Hearing Officer: Glenn Erickson

Jack Rich, Seeley Lake: My family and I own and operate a outfitting guest ranch adjacent to the winter range. We have supported the project from the get go, we have donated our time, dollars and efforts and we strongly support phase three of the project to see its completion.

Trent Toms: I was lucky enough to be in on this project from the start. I have been hunting in this state since 1952 and I think this is probably one of the best jobs coming out of Fish, Wildlife & Parks that I have seen. I am all behind this and I think this is a really worthwhile project.

Bruce Wold, Seeley Lake: I have been involved with the project since the start in '99 and I am definitely in favor of the phase three. Thank you.

Bonnie Wasson, Seeley Lake: I have also been apart of this project since the very beginning. After watching for five years the level of cooperation, I can't imagine that anyone could find any reason not to go through with this. My husband couldn't be here tonight but we are both absolutely one hundred percent in favor of it.

John Richards, Seeley Lake: I have not been involved with the project, but as someone coming for the first time I want to commend everyone for all the work that has been put in so far. I strongly support it and I think it is good use of public funds to pursue something for the future. I whole heartedly support the efforts you guys have made and hopefully you take the next step and go farther.

John Keller, Seeley Lake: My wife, Pamela, and I moved to the valley in 1998 and we were attracted to this area because of the wide open spaces and the sentiment that the people held in this valley for keeping things the way they were. We got very active in 1999 in phase one initiatives and have been active since. We can't imagine why anyone wouldn't want to go forward with this and strongly support and look forward to its completion.

Ed Lamb, Seeley Lake: I have had the ability, when I worked for Plum Creek in the past, I have done some management on the Clearwater Game Range and worked closely with Fish, Wildlife & Parks. I think this is a very good opportunity to make sure this land holdings go into public so we do not have any future developments in the area. It would be a shame to loose some of this prime area that is now being used for the winter range of the wildlife that could possibly loose some of the possible winter range do to development. I am all in favor, and I am also the chapter chair for the Blackfoot Clearwater RMEF Chapter and I know that our chapter is in full support of this project. Thank you.

Jim Stone, Ovando: Rancher, we support a good share of your elk so obviously we have a lot of interest what goes on on this game range and the development further on in the road. Really involved in the other 41 thousand with the Nature Conservancy and the Challenge so just looking long term this is a huge benefit I think for the Blackfoot water (inaudible) as a whole so the Challenge and myself support this whole heartedly. Thanks.

Keith Lenard, Missoula: I work for the Rocky Mountain Elk Foundation in Missoula. I just want to follow up with what Jim said, I have seen so much of the Blackfoot Challenge and the whole community be organized very pensively around this Nature Conservancy acquisition, this is an important part of that and an extraordinarily high valued public land. The (inaudible) Elk Foundation strongly supports it and hopes that Fish, Wildlife & Parks will be able to go forward with the acquisition.

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

COMMENT FORM

****

Name: Rena Heaton

Address: (Street) PO Box 22

(City/State/Zip) Seeley Lake MT 59868

Please submit your views, arguments and endorsements in the following space. Attach additional information to this form if you wish.

Yes

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

COMMENT FORM

****

Name: Ty Heaton

Address: (Street) PO Box 22

(City/State/Zip) Seeley Lake, MT, 59868

Please submit your views, arguments and endorsements in the following space. Attach additional information to this form if you wish.

Yes I do support the project

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

COMMENT FORM

****

Name: Wayne Heaton

Address: (Street) PO Box 22

(City/State/Zip) Seeley Lake MT 59868

Please submit your views, arguments and endorsements in the following space. Attach additional information to this form if you wish.

Yes of Course

BLACKFOOT CLEARWATER WILDLIFE MANAGEMENT AREA

APRIL 28, 2004
SEELEY LAKE, MT

****

COMMENT FORM

****

Name: KEITH LENARD

Address: (Street) 2291 W. Broadway

(City/State/Zip) Missoula MT 59808

Please submit your views, arguments and endorsements in the following space. Attach additional information to this form if you wish.

This is an exceptional opportunity to add some very high public value lands to the WMA and reduce the potential for habitat loss and threat of development on a critical WMA in-holding.

Thompson, Michael

From: Bonnie Wasson [shiptech@blackfoot.net]
Sent: Sunday, April 18, 2004 12:16 PM
To: Mike Thompson
Subject: BCWMA

I have read the Proposal to complete the purchase of Private Inholdings within the Blackfoot - Clearwater Wildlife Management Area, and my position is that the proposal is complete and that we should proceed with the proposal.

Upgrade Your Email - Click here!

Thompson, Michael

From: Higgins, Hubert, MSG, 120th MAINTENANCE SQ, EGRS [hubert.higgins@mtgrea.ang.af.mil]
Sent: Wednesday, April 21, 2004 8:21 AM
To: 'mthompson@state.mt.us'

dear Mr Thompson: I would like to comment on the FWP to spend 3.3 million to buy 3,834 acres of private land in the blackfoot-clearwater WMA . all I can say is go for it, the more habitat we can save for the elk and future hunters like my grandchildern the better. so take it from this grandfather and hunter I think the FWP is doing a great job protecting the wildlife and habitat in Montana so keep up the good work.
yours truly
hubert e higgins

Thompson, Michael

From: O'Connor Roy [rsoc2001@yahoo.com]
Sent: Thursday, April 22, 2004 2:09 PM
To: mthompson@state.mt.us
Cc: paul daniels
Subject: Blackfoot clearwater purchase

Mike, I strongly support FWP's plans to purchase from Plum Creek Timber Co. the final 3,834 acres of inholdings within the Blackfoot-Clearwater Wildlife Management Area at a price of $3.3 million. It is a very important wintering area for wildlfe in the Blackfoot Valley, and this is the only way we can insure its future protection. I congradulate you and FWP and Plum Creek for working together on finalizing this proposal, and look forward to its completion.
Roy O'Connor
Heart Bar Heart Ranch
Ovando, Mt

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Skyline Sportsmen' Association, Inc.
Box 173 Butte, Montana 59703

APR 2 3 2004

Montana Fish, Wildlife and Parks
Region 2 Office
Attn: Mike Thompson (Wildlife Biologist)
3201 Spurgin Road
Missoula, MT 59804

Dear Mike:

This letter is to express the Skyline Sportsman's Association's support for the purchase, by Fish, Wildlife and Parks, of the 3834 Acres within the Blackfoot-Clearwater Wildlife Management Area from the Rock Mountain Elk Foundation. We fully support this purchase and feel that it is in the best interest of wildlife, sportspersons and the public that FWP have full ownership and management of these acres.

Sincerely

Richard J. Douglass
Corresponding Secretary
samjd@montana.com

Mike Thompson
Montana Fish Wildlife & Parks
3201 Spurgin Road
Missoula, Montana 59804

Mr. Thompson:

On behalf of the Blackfoot Clearwater Wildlife Management Area Citizens Advisory Council I would like to voice our strong, unanimous support of the Montana Fish, Wildlife and Parks (FWP) proposal to purchase the remaining private lands inside the Blackfoot Clearwater Management Area (BCWMA) boundaries as described in the April 9, 2004 Draft Environmental Assessment.

The advisory council was revived in the mid 1980's by local sportsmen and landowners concerned with the loss or potential loss of elk habitat and migration routes in the area of the BCWMA. Since that time we have worked with FWP to provide input on management issues that concerned both FWP and local citizens. The 50th anniversary of the formation of the BCWMA along with changes in local land ownership around the wildlife management area served as the sparks for increasing interest in consolidating the land holdings. This purchase is the culmination of that effort and represents the work of numerous private organizations along with state and federal governmental agencies, all working toward this common goal.

Over the course of the 50th anniversary project to consolidate ownership and management of the BCWMA such diverse entities as the Five Valleys Land Trust, Rocky Mountain Elk Foundation, Plum Creek Timber, U.S. Forest Service, U. S. Bureau of Land Management, Montana State Lands, Montana Fish, Wildlife and Parks, The Nature Conservancy, and local organizations such as the Blackfoot Challenge and the BCWMA Advisory Council have all played roles in helping to protect this vital winter range. The cooperation of these groups shows a broad base of support for the overall project and the importance these groups place on habitat protection as afforded by this proposal.

The approval of this proposal and subsequent purchase of the current Plum Creek Timber lands by FWP provides for improved management, due to single ownership of the core lands inside the BCWMA. The improved management will provide more suitable and thereby more sustainable habitat for the wildlife, better controls on game damage to local private ranches, a more enjoyable recreational experience for the public, and fulfills the wishes of all parties involved.

Again, I strongly urge approval of this proposal to provide FWP the ability to purchase these lands thereby provide more consistent, sustainable habitat management of the BCWMA now and into the future.

Sincerely

Arthur J Sikkink
Chairman, Blackfoot Clearwater Wildlife Management Area
Citizens Advisory Council

Thompson, Michael

From: Ira T. Holt [irachar@bitterroot.net]

Sent: Thursday, May 13, 2004 2:29 PM

To: mthompson@state.mt.us

Subject: BCWMA Draft EA

Mike,

It is good to see that the 50th Anniversary Project is coming to a successful end. I really have no particular comment on the EA, other than to say "halleluah". Thanks to you and your hard work to see this through.

Sincerely,

Ira T. Holt
548 Cielo Vista
Hamilton, MT 59840
406-961-3302
irachar@bitterroot.net

The Nature Conservancy
SAVING THE LAST GREAT PLACES ON EARTH

The Nature Conservancy of Montana
P.O. Box 8316
Missoula, MT 59807

tel [406] 543.6681

nature.org

Mike Thompson
Montana Department of Fish Wildlife and Parks
3201 Spurgin Rd
Missoula, MT 59804

May 4, 2004

Dear Mike,

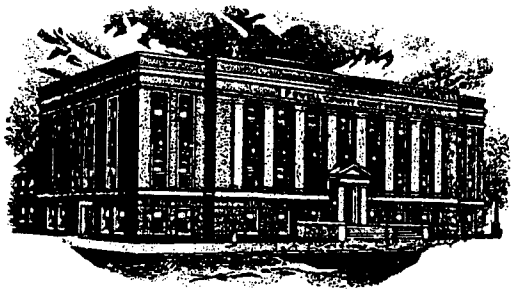
I am writing to comment on the Management Plan for Boyd and Sperry Mountain areas within the Blackfoot-Clearwater Wildlife Management Area, as well as the Environmental Assessment to purchase and manage several parcels of land from The Nature Conservancy of Montana.

As Western Montana Director of Science and Stewardship for The Nature Conservancy, I was asked to provide comments for our organization. I have reviewed the documents and find them to be well researched and written. Incorporating these parcels into similar management as the surrounding wildlife management area is consistent and appropriate for the wildlife and vegetation of the area. This plan also is consistent with the mission of The Nature Conservancy which is to preserve the biodiversity of this area through sound resource management. The Nature Conservancy supports this action.

Sincerely,

Maria Mantas

Maria Mantas
Western Montana Director of Science and Stewardship
mmantas@tnc.org



COUNTY OF POWELL

DEER LODGE, MONT.

May 7, 2004

Mike Thompson
Montana Fish, Wildlife & Parks
3201 Spurgin Road
Missoula, MT 59804

Dear Mr. Thompson:

Thank you for attending the Powell County Planning Board meeting at Ovando on May 6, 2004. We appreciated your presentation of the A Proposal by Montana Fish, Wildlife & Parks to Purchase 3,834 Acres within the Blackfoot-Clearwater Wildlife Management Area from the Rocky Mountain Elk Foundation. Approximately 900 acres of the proposal are within Powell County.

After hearing your discussion of the current and proposed uses of the land and its resources and considering your response to board members' questions, it was the sense of the planning board members that this land acquisition will be in the public interest. Please accept our support for the proposal.

Sincerely,

William H. Mattice, President
Powell County Planning Board

BLACKFOOT COMMUNITY PROJECT

Our Land, Our Future

May 10, 2004

Mike Thompson
Montana Department of Fish, Wildlife & Parks
3201 Spurgin Road
Missoula, MT 59804

Dear Mike:

The Blackfoot Challenge strongly supports the proposal for the Department of Fish, Wildlife and Parks to purchase 3,834 acres within the Blackfoot-Clearwater Wildlife Management Area from the Rocky Mountain Elk Foundation. This purchase is critical to prevent residential or commercial development on key winter range within the BCWMA.

As you know, the Blackfoot Challenge is a watershed-wide group composed of private landowners, public agencies and conservation organizations dedicated to the protection of the natural resources and rural lifestyle of the Blackfoot River Valley. The Challenge is a partner with the Nature Conservancy of Montana in the Blackfoot Community Project -a cooperative effort to purchase approximately 88,000 acres of Plum Creek Timber Company land in the valley and re-sell it to a variety of private parties and public agencies. This transaction is an important part of this proposal.

As part of our public involvement process in the BCP we have held a total of 10 community meetings in the valley since late 2002. The purpose of these meetings has been to gather public input for the values they wish to see preserved on the Plum Creek lands. Right from the beginning there has been unanimous public support for FW&P acquisition of Plum Creek lands within and adjacent to the BCWMA.

The Blackfoot Challenge urges that the Montana Fish, Wildlife and Parks Commission approve this proposal and that they use funds from the Habitat Montana Program for the purchase. It would also be very appropriate to reimburse the HMP from the federal Forest Legacy Program in Fiscal Year 2005.

Thank you for the opportunity to comment.

Sincerely,

Hank Goetz
Lands Director
The Blackfoot Challenge

The Nature Conservancy

BLACKFOOT CHALLENGE

Plum Creek
Growing Value from Exceptional Resources

May 12, 2004

Mike Thompson
Montana Fish Wildlife and Parks
Region 2 Office
3201 Spurgin Road
Missoula, MT 59804

Dear Mike:

I write once again in support of the Blackfoot-Clearwater Wildlife Management Area (BCWMA). Previously I supported the Phase II Land Exchanges and a conservation easement on the DNRC lands. I wrote of my personal history with the area (about 34 years now), first as a hunter, later as a student, then teacher, research cooperator with FWP, and member of the BCWMA Citizens Advising Council. In those letters I based my support for the proposals on the tremendous biological, ecological and educational values of the BCWMA.

However, the area provides significant economic values to Montana as well. The big game animals that winter on the BCWMA use a much broader area during summer and fall. Therefore the BCWMA is the key asset in a multi-million dollar business, based on hunting and wildlife viewing, centered in the upper Clearwater and Blackfoot areas, and covering much of the Bob Marshall Wilderness.

Therefore, to secure its long-term integrity, I wholeheartedly support the proposal to complete the purchase of private in holdings within the BCWMA. I encourage the Commission to support the proposal as well. Thank you for your consideration.

Sincerely,

Les Marcum

Les Marcum
Professor, Wildlife Biology
The University of Montana

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Missoula Field Office
3255 Fort Missoula Road
Missoula, Montana 59804-7293
http://www.mt.blm.gov/mifo

TAKE PRIDE IN AMERICA

In Reply To:

6500

Mike Thompson,
Montana Fish, Wildlife and Parks
3201 Spurgin Road,
Missoula, MT 59804

MAY 1 3 2004

Dear ~~Mr. Thompson~~ Mike:

I wanted to compliment you and your office on the Environmental Assessment proposal to purchase the remaining 3,834 acres of private lands within the Blackfoot-Clearwater Wildlife Management Area (BFCWMA). The Bureau of Land Management (BLM) currently administers approximately 500 acres of public lands within the BFCWMA for multiple use, and is in the process of obtaining additional private lands at other locations within the Blackfoot River Valley.

The proposed Fish, Wildlife and Parks (FWP) land acquisition would benefit elk, deer, wolves, grizzly bears, and a host of other native wildlife species by conserving valuable wildlife habitat. The area is especially important in providing habitat for wintering ungulates. The proposal also benefits the public by obtaining lands for recreational uses. BLM fully supports the efforts of FWP to purchase these lands, and we look forward to working cooperatively with you on future resource management planning and implementation efforts.

Please contact Jim Sparks, Wildlife Biologist, at 329-3827 if you have any questions or would like additional information.

Sincerely,

Nancy T. Anderson

Nancy T. Anderson
Field Manager

F. H. STOLTZE LAND & LUMBER CO

Lumber Manufacturers
Box 1429 • Columbia Falls, Montana 59912
Phone (406) 892-7000 • FAX (406) 892-1612
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May 11, 2004

Mike Thompson, Wildlife Biologist
Region 2 Office
Montana Fish, Wildlife, & Parks
3201 Spurgin Road
Missoula, MT 59804

Dear Mr. Thompson:

In response to the recently published Draft Document, labeled as an E.A., Socio-Economic Assessment, and Management Plan for the purchase of Plum Creek Timber Company lands within the Blackfoot-Clearwater Wildlife Management Area, F.H. Stoltze Land and Lumber Company has the following comments to offer.

1.) MWFP has not always exhibited the best record of forest stewardship or recreation management on the State lands they've been entrusted with. We recognize the budgetary constraints you deal with, however, this is a large tract of land that will require a good deal of funding to combat noxious weeds, manage public recreation, maintain roads, and properly maintain forest health. Your desired acquisition includes almost 4,000 acres above and beyond the acreage you already have in the BCWMA. Forestland grows and changes rapidly and even the proposals for prescribed burning will be costly. Do you have a long-range management strategy and budget to prepare you for the task that lies ahead? Will you be able maximize public access and recreation opportunities?

2.) According to the E.A., wildlife numbers have increased dramatically since the 1948 creation of the Blackfoot-Clearwater Wildlife Management Area. Additional security would likely increase that trend. What are your management goals for dealing with human / wildlife conflicts? How will you address the roadkill situation along State Highway 200?

3.) The Appendix A (Draft Management Plan) is only 8 pages long and lacks the details necessary for managing and maintaining the forested areas in question. If the final version of this Draft will serve as an Amendment to the existing management plan for the BCWMA (revised in 1989), as stated on page 1, then we would request that you put more effort into creating an adequate plan. Examples include the following:

A.) On page 7, where you discuss timber harvests that are limited only to prescribed treatments for the next 20 years that would enhance growth rates and recruitment of old ponderosa pine, larch, and Douglas-fir.....you must be more specific. Recruiting large old trees will require wide tree spacing to achieve; likely 30 feet or more between trees if you wish to maximize growth rates so that you have large trees within 60 years instead of 200! Describe the diameter or size of a "large old tree" so there is a clear idea of what you are trying to achieve.

B.) The Management Plan also states that prescribed timber harvest might be appropriate on some sites to avoid the risk of losing cover to stand replacement fires in the future. This should be a given for ALL of your sites!!! Why isn't it? The words *"might be appropriate"* <u>must</u> be changed to *"will occur.....".*

C.) Page 8 states that MFWP expects to prescribe little or no forest management on the subject lands in the near future. We recognize that the subject lands are currently under Plum Creek Timber Company ownership and would assume that a low stocking level is your rationale for doing little or no forest management in the near future. What are your plans for management beyond that time frame? Will forest restoration efforts take place outside of the 6-month window that public access is allowed within the BCWMA?

D.) If MFWP is planning to manage the lands in cooperation with DNRC through the MEPA process as you are doing on other portions of the BCWMA, then the Draft Management Plan as it is written now, will leave you vulnerable to much speculation under the MEPA law. If you adhere to DNRC's guidance for Trust Land Management, where will proceeds / profits from forest management go? Will they benefit the School Trust or be used for another purpose?

Please provide a more specific management plan that will provide answers to the above questions. On a more positive note, the management plan does a good job of describing public access and noxious weed management objectives for the acquisition land.

4.) One of our concerns is the economic impact of transferring this land from private ownership to government management. If future profits acquired from managing the intended acquisition won't benefit the Trust, and timber management is no longer the priority on the acquisition acreage, there will undoubtedly be a loss of economic benefit to the community, local businesses, and schools. In Appendix B this impact is said to be minimal but admittedly negative. That may be true for this 3,834 acres, however, combined with changes in management strategies on the other large acquisitions of Plum Creek Land through the Nature Conservancy and Rocky Mountain Elk Foundation, and the economic impact is huge for the Seeley and Missoula areas.

5.) There must be vegetation manipulation if this area is to retain or acquire the wildlife qualities that it is being purchased for. Wildlife managers must begin to recognize and talk about these benefits.

Thank you for the opportunity to comment on your Assessment and Management Plan. Please keep us informed when a final plan is presented and feel free to contact us for clarification of our comments.

Sincerely yours,

Ronald Buentemeier

Ronald Buentemeier
General Manager

RB/hm

Mike, May 2004

Congratulations on the most informative and well ~~co~~ conceived EA on the BCWMA.

The managed area this large serves as a great anchor for our valleys.

Thank you,

Stan