



Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

July 20, 2020

*Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804*

Re: Helena - Lewis and Clark Forest Plan Objections

1. Background

I write to you on behalf of the Montana Wildlife Federation (MWF). We are Montana's oldest conservation organization, founded in 1936 by passionate and dedicated conservationists. Today, we represent a diverse group of public land users and advocates who regularly and actively use the lands encompassed by the Helena-Lewis and Clark National Forest (HLCNF). We thank you for this opportunity to comment and provide feedback on the Final 2020 Land Management Plan (Final Plan) and Final Environmental Impact Statement (FEIS) for the HLCNF Plan Revision.

We recognize the importance of properly managing the HLCNF and the key role that collaboration plays in this process. As you well know, this planned revision is long overdue and for a diverse forest that ranges 2.8 million acres, a strong management plan must be implemented as soon as possible. For many individuals, this will be the plan that is in place for the rest of their life. For some, it will be the plan that illustrates what sound forest management should look like. Due to the lasting impact of this plan, we ask that you carefully consider our objections and weigh carefully the benefits that would come from implementing these objections.

The key priorities for MWF are the protection of wildlife, wildlife habitat, and public access. Our objections are aimed at finding a balanced approach to sound management and quality access for recreation. We recognize that finding a balanced management plan is difficult, but it is necessary and possible. The following is an outline of our objections for the Final Plan of the HLCNF Forest Revision Process. Our objections are primarily focused around our subjects found within our previous comments including: wildlife security, wilderness designations, recommended wilderness, and recreation.

2. Objections

a. Wildlife

Objection #1: NCDE Forestwide Plan Components need Desired Conditions (DC) that explicitly address grizzly bear population objectives.

Solution: A DC needs to be added that states that “NFS lands be managed to improve grizzly bear habitat and connectivity in order to maintain the upwards trajectory of the population.”

Objection #2: Wildlife Guideline 05 states that “Vegetation management activities on identified big game winter range should occur only when they will maintain or improve future forage quantity and quality, and should retain intermixed areas of forest, where possible, to provide hiding and thermal cover.” As a guideline, this statement does little to direct wildlife management in the forest.

Solution: This Guideline should be set as a Standard in order to more explicitly guide wildlife security habitat management across the forest.

Objection #3: Wildlife Guideline 07 states that “New fencing installation or reconstruction should be sited and designed to minimize hazards to wildlife and barriers to wildlife movements.” As a guideline, this statement does little to direct wildlife management in the forest.

Solution: This Guideline should be set as a Standard in order to more explicitly address the issue of fencing to wildlife dispersal across the forest.

Objection #4: In the Introduction section of the North Continental Divide Ecosystem Grizzly Bear Habitat Management Direction (NCDE), the plan states:

“Zone 3 comprises the Highwoods, Little Belts, Castles, and Crazies GAs; long-term survival and occupancy of grizzly bears is not expected to occur in Zone 3 due to lack of sufficient suitable habitat.”

MWF believes it is not accurate to include “and occupancy” within that statement. It is not reasonable to expect that grizzlies will not occupy some of these regions as their range expands.

Solution: We ask that the portion of the previous statement referencing grizzly bear occupancy be removed.

b. Recreation
Recreation Opportunity Spectrum

Objection #1: Primitive Recreation Opportunity Spectrum (ROS) settings should not allow mechanized use without a site-specific analysis. Mechanized use should not be allowed carte blanche in all regions outside of Wilderness designations or Recommended Wilderness settings.

Solution: Primitive ROS suitability standard (FW-ROS-SUIT-02) stating that mechanized use is suitable within primitive areas should be removed. Allowing mechanized use within a primitive use area should be done site-specifically.

Outfitting

Objection #1: To ensure continued hunting opportunities for Montanans, MWF strongly believes the current number of outfitting licenses should be capped at its current level south of highway 200.

Solution: The Helena-Lewis & Clark National Forest should establish a Standard stating that no new outfitting licenses shall be issued south of highway 200.

c. Designated Areas
Recommended Wilderness

Objection #1: Deep Creek, Tenderfoot, MFJ, Crazy Mountains, Arrastra Creek, and Camas Creek are not listed as Recommended Wilderness Areas under the preferred Alternative.

Solution: These areas exhibit exceptional wilderness characteristics that are beneficial for wildlife and fisheries habitat as well as recreational purposes. These areas should all be listed as Recommended Wilderness.

Objection #2: Recommended Wilderness Area Standard 01 states: “Within recommended wilderness areas new leases for leasable minerals shall include a no surface occupancy stipulation.”

Solution: This Standard should be amended to completely exclude new leases.

Wilderness Study Areas

Objection #1: WSA Standard 01 states: “Within recommended wilderness areas new leases for leasable minerals shall include a no surface occupancy stipulation.”

Solution: This Standard should be amended to completely exclude new leases.

Inventoried Roadless Areas

Objection #1: Inventoried Roadless Area Suitability Statement 02 states: “Forest system roads (that are managed as part of the forest transportation system) in inventoried roadless areas are suitable for motorized and mechanized means of transportation.”

Solution: This Suitability Statement should be amended to make motorized transportation unsuitable.

d. Geographic Areas

Big Belts Geographic Area

Objection #1: Camas Creek is not listed as a Recommended Wilderness Area (RWA). This area exhibits wilderness characteristics and is one of the few areas within the Big Belts that are not inundated with roads.

Solution: List Camas Creek as an RWA.

Objection #2: This Geographic Area (GA) needs specific wildlife standards to address issues surrounding bighorn sheep and domestic sheep interactions.

Solution: MWF holds that this forest should adopt wildlife standards similar to those found within alternatives listed in other nearby national forests. The example from the Nez Perce Clearwater National Forest is in line with what MWF believes is needed to prevent domestic and bighorn sheep interaction.

FW-STD-WL-02. In order to prevent disease transmission between wild and domestic sheep, domestic sheep or goat grazing shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home ranges.

FW-GDL-WL-05. New authorizations and permit reauthorizations for domestic goat packing should include provisions to prevent disease transmission between domestic goats and bighorn sheep.

Castles Geographic Area

Objection #1: The Castle Inventoried Roadless Area (IRA) should be classified as non-motorized within the Recreation Opportunity Spectrum (ROS).

Solution: Change the ROS setting for the Castle IRA to semi-primitive non-motorized use.

Crazies Geographic Area

Objection #1: The Box Canyon Inventoried Roadless Area (IRA) should be classified as non-motorized within the Recreation Opportunity Spectrum (ROS).

Solution: Change the ROS setting for the Box Canyon IRA to semi-primitive non-motorized use.

Objection #2: The Loco Mountain Roadless Area exhibits Wilderness characteristics and should be listed as a Recommended Wilderness Area (RWA).

Solution: List the Loco Mountain Roadless Area as a RWA.

Elkhorns Geographic Area and Wildlife Management Unit

Objection #1: The Elkhorns Core Area needs to be managed for primitive uses within the Recreation Opportunity Spectrum (ROS), including the ingress of Tizer Lake Road. Leaving Tizer Lake Road as roaded natural within the ROS could lead the development creep that will further endanger this critical ecosystem.

Solution: Designate the ingress of Tizer Lake Road as a Primitive ROS setting.

Objection #2: Mechanized recreation should be excluded from the core of the Elkhorns Geographic Area (GA). As a region renowned for its wildlife values, this GA is unsuitable for mechanized use.

Solution: Exclude mechanized recreation from the core of the Elkhorns GA as proposed in Alternative C.

Objection #3: Clear standards need to be established to exclude future oil and gas development.

Solution: Add a standard explicitly excluding all future oil and gas exploration and development from the Elkhorns GA.

Highwoods Geographic Area

Objection #1: The Highwoods Inventoried Roadless Area (IRA) should exclude motorized recreation.

Solution: Designate the Highwoods IRA as semi-primitive non-motorized within the Recreation Opportunity Spectrum (ROS).

Little Belts Geographic Area

Objection #1: The Middle Fork of the Judith (MFJ) Wilderness Study Area (WSA) should be designated as a Recommended Wilderness Area (RWA).

Solution: List the MFJ WSA as a RWA. We support the boundaries established in Alternative D.

Objection #2: Inventoried Roadless Areas (IRAs) across the Little Belts Geographic Area (GA) should be managed to exclude motorized rec.

Solution: Exclude motorized recreation from IRAs within the Little Belts GA.

Objection #3: Deep Creek exhibits wilderness characteristics and should be designated as an RWA. We support the boundaries established in Alternatives B and D.

Solution: List Deep Creek as a RWA as proposed in Alternatives B and D.

Rocky Mountain Range Geographic Area

Objection #1: The Badger Two-Medicine area is an exceptional cultural resource for the Blackfeet Nation and should not allow mechanized use within the boundaries proposed by the Badger Two-Medicine Collaborative.

Solution: Exclude mechanized recreation from the Badger-Two Medicine as proposed by the Badger Two-Medicine Collaborative.

Snowies Geographic Area

Objection #1: The Big Snowies Inventoried Roadless Area (IRA) and Wilderness Study Area (WSA) exhibit wilderness characteristics and should be listed as a Recommended Wilderness Area (RWA). We support boundaries established in Alternatives B and D.

Solution: Designate the Big Snowies IRA and WSA as an RWA as proposed in Alternatives B and D.

Upper Blackfoot Geographic Area

MWF has been involved in a collaborative partnership with local Lincoln residents, other conservation organizations, and land user groups within the Lincoln Valley for over 5 years now. As part of the Upper Blackfoot Working Group (UBWG), MWF's objections are in line with this initiative.

Objection #1: MWF objects to the location of the Nevada Mountain Recommended Wilderness Area (RWA) northern boundary.

Solution: MWF requests that the HLCNF move the northern boundary to be consistent with the boundary in our consensus landscape proposal. See attached map.

Objection #2: MWF objects to the location of the Silver King RWA (Scapegoat Wilderness Inclusion).

Solution: MWF requests the boundary be changed to be consistent with the boundary in our consensus landscape proposal (see attached map), with continued protection of Alice Creek as a National Historic District, Conservation, under current travel management without change.

Objection #3: MWF objects to the removal of Arrastra Creek from inclusion as a Recommended Wilderness Addition to the Scapegoat Wilderness.

Solution: MWF requests the inclusion of the Recommended Wilderness boundary for Arrastra Creek put forward in our consensus landscape proposal. See attached map.

Objection #4: MWF objects to specific components of the Summer Recreational Opportunity Spectrum map that conflict with our consensus landscape proposal in the areas of Stemple Pass, Gould-Helmville Trail, and South Poorman Creek.

Solution: Adjust the Summer ROS map to be consistent with the proposed future trail corridors for mountain bikes and OHVs in the UBWG consensus landscape proposal. See attached map.

FOOTNOTE: Alice Creek summer ROS: The Montana High Divide Trails collaborative (and Lincoln collaborative group) support forest plan and legislative proposals that continue existing travel management in Alice Creek. North of Lewis and Clark Pass, the CDNST and Trail #490 are managed for foot and stock, while south, the CDT is open to foot, stock and non-motorized bicycle travel. We wish to note here that the final summer ROS should support this clear outcome.

3. Closing Statement

This forest is well-known for its diverse array of ecosystems and the sheer amount of biodiversity found within these unique geographic regions. Many of Montana's characteristic megafauna are found here as well as critical nongame species and world-renowned game animals. With proper planning and input, this forest can continue to adequately care for the land held in our trust.

Crafting a comprehensive land management plan to guide forest-wide direction is no easy feat and we commend the HLCNF for undertaking this effort and including the public and every step of the way. MWF is grateful for the opportunity the Helena-Lewis & Clark National Forest staff has provided throughout the forest plan revision process.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Clewis". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric Clewis
Lead Objector
Western Montana Field Coordinator
Montana Wildlife Federation

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